



Report to Cabinet

Subject: Proposed Changes to the East Midlands Regional Plan: Public Consultation

Date: 2nd October 2008

Author: Planning Policy Manager on behalf of Portfolio Holder Cllr Bexon

Purpose of Report

To authorise a response to the Proposed Changes to the East Midlands Regional Plan which has been issued for public consultation, in accordance with the Council's corporate objective to enhance the physical environment of the Borough.

Background

The Secretary of State for Communities and Local Government published the Proposed Changes to the Regional Spatial Strategy (RSS) for the East Midlands in July 2008. Comments have been invited by 17th October 2008. The Proposed Changes follow the Public Examination held between May and July 2007 and the Panel Report published on 28th November 2007.

Once adopted it will replace the RSS8 issued by Government in March 2005 and policies in the Nottinghamshire and Nottingham Joint Structure Plan, adopted February 2006. The Regional Plan provides a regional framework for development and investment up to 2026 and will provide the strategy within which the Borough Council's Local Development Framework (LDF) should be prepared.

Broad Contents of the Proposed Changes

The key changes include:-

- Provision for new housing over 2001-2026 period is for 74,050 dwellings for the Nottingham Core HMA plus Hucknall. Housing figures are set as minima. This does not include the very latest household projections which forecast around 22,100 new households being formed in the region upto 2026. This

will be taken into account in the RSS review which is planned to commence in October 2008.

Specifically, Gedling Borough is to make provision for 9,200 dwellings, of which 6,680 should be within or adjoining the Nottingham Principal Urban Area (PUA), including sustainable urban extensions as necessary. This represents an increase of 1,450 dwellings for the Borough over the period of the plan. It should be noted that the redistribution of district housing provision to meet the HMA minima will be allowed if “sound joint Core Strategies” are in place.

- Rejection of the Panel’s recommendation to delete Green Belt areas around Nottingham.
- Removal of site specific references to urban extension locations around Nottingham, Leicester and Lincoln.
- Eco-Towns are ‘outwith the scope of this RSS’ and a matter for the Review of the RSS. However, supporting text in the 3 Cities section indicates that local development documents (LDDs) should consider an eco-town within the HMA. Any successful eco-town proposal would need to be considered as part of the next RSS review which will take the plan upto 2031.
- Affordable housing totals are provided for monitoring purposes and represents approximately 32% of the overall provision. They are now provided as total figures rather than percentages. The targets to be adopted by districts should reflect up to-date housing market assessments. In addition, a new policy relating to affordable housing in rural areas has been added.
- Increased pitch requirements for Gypsies and Travellers are also proposed.
- A new policy on Strategic Distribution mentions a location in the Nottingham Core HMA. This has resulted from the sharp increase in the demand for strategic distribution sites which are difficult to accommodate on existing employment sites. Sites require good rail and highway network access.
- A new policy on Air Quality.
- A revised Waste Management Policy.
- A requirement for the Implementation Plan to be removed from the Regional Plan and for it to be recast as a freestanding document to be published alongside the Plan and then updated by the Regional Planning Body (i.e. the East Midlands Regional Assembly) on a regular basis.

Document Structure

The Regional Plan is divided into two parts. Part 1 Regional Strategy includes Section 1: Core Strategy, Section 2: Spatial Strategy, Section 3: Topic Based Priorities. Part 2 includes the Sub-Regional Strategies and of specific importance for Gedling Borough is the Three Cities Sub-Regional Strategy.

Comments

Outlined below are comments (in *italics*) on the strategy and policies which are considered to be of key significance to the production of Gedling Borough’s Local Development Framework (LDF).

Government guidance recommends regional strategies should be drawn up within an overarching sustainable framework. This is provided by the East Midlands Integrated Regional Strategy (IRS). This Strategy now includes a new paragraph on climate change highlighting that many policies specifically deal with climate change adaptation and/or mitigation, reflecting a commitment to implement the Climate Change Programme of Action commissioned by the East Midlands Climate Change Partnership. *This clarification is welcomed, as it is acknowledged that climate change is a significant issue for the future of the Region.*

Policy 1 Regional Core Objectives

This policy looks to secure the delivery of sustainable development within the East Midlands and includes a number of new core objectives. Of key importance to the Borough are the following new core objectives:-

- a) to ensure that the existing and future housing stock meets the needs of all the communities in the region.
- c) urban and rural settlements should be clean and crime free places to live, work and invest in including “involvement of Crime and Disorder Reduction Partnerships”. *(This has been identified as a priority theme in the Gedling Community Strategy).*
- j) reduce the impacts of climate change – reducing the build up of heat island effects in urban areas; providing carbon sinks and providing sustainable drainage and managing flood water. *(This is currently being actively explored at the County and local level and is supported).*

Policy 2 Promoting Better Design

The new paragraph 1.4.2 identifies that “in the interim period, before Development Plan Documents (DPD) are in place, all new developments of more than 10 dwellings, or for other uses exceeding 1000 sq m floorspace, should secure at least 10% of their energy from decentralised and renewable or low-carbon sources. *This change is welcomed but for effective implementation it is considered that this should be contained within the policy and not the supporting text. In addition, local requirements should be specified in terms of achievement of nationally described sustainable buildings standards, for example the Code for Sustainable Homes in the case for housing.*

Policy 3 Concentrating Development in Urban Areas

To maximise the development of key elements of the economy and to build on the existing infrastructure, a policy of urban concentration has been adopted. The policy provides a new emphasis that new development should be concentrated primarily in and adjacent to the Region’s five Principal Urban Areas which include Nottingham. Paragraph 2.2.6 from the Proposed Changes emphasises that, in order to ensure consistent policies and co-ordinated development proposals at the local level, joint LDF Core Strategies and Action Plans should be pursued. *No further explanation is provided as to c), what is appropriate development of a lesser scale which should be located in the Sub-Regional Centres (SRC) which for the Three Cities Sub-area includes Hucknall and Ilkeston. Paragraph 2.2.10 flags up that development in SRCs should support individual roles and functions and that it should not be of a scale and*

character that prejudices the urban renaissance of the PUAs. It is considered that further clarity is required as to what volume of development of a lesser scale would be deemed appropriate.

The Government's intention that a number of eco-towns are to be built around the country are outwith the scope of this RSS and the longer term issues that arise will be considered within the RSS review which is due to commence in October 2008.

A further addition within this policy is that, in assessing the suitability of sites for development, priority should be given to making best use of previously developed land and vacant and under-used buildings, contributing to the achievement of a regional target of 60% of additional dwellings on previously developed land or through conversions. *This aspiration is supported but it does not necessarily follow that with the allocated housing growth that there is brownfield capacity to meet the targets.*

Regional Priorities for Housing

The supporting text in this section encourages the use of higher densities to make more efficient use of land. This principle is supported.

Future reviews of housing will need to give particular attention to:

- Current and projected levels of stress on the core and regional trunk road network;
- Current and projected public water supply and sewage treatment capacity 'headroom';
- The likely impact on targets to reduce CO2 emissions; and
- The results of Strategic Flood Risk Assessments across the Region.

All the areas listed are key and it is viewed that there is an inherent weakness with deferring specifically transport issues to the review.

Policy 13 Regional Housing Provision (comments also apply to policy **SRS 3 Housing Provision**)

This policy specifies the housing numbers, which are minima, with the Nottingham Core Housing Market Area and Gedling totals shown below.

| | 2001-06 | 2006-11 | 2011-16 | 2016-26 | Total |
|------------------------|---------|---------|---------|---------|--------------|
| Nottingham Core HMA | 2060 | 2460 | 2820 | 3380 | 70,500 |
| Gedling | 230 | 300 | 370 | 470 | 9,200 |

The Proposed Changes introduce phasing to deliver housing over the RSS period, which it divides into four tranches. Higher levels of delivery are expected for each tranche, weighting delivery to the latter part of the RSS period.

The policy also highlights that a redistribution of District and County apportionments to meet the Housing Market Area minima via sound joint Core Strategies will be acceptable, provided that the policy of urban concentration for the Principal Urban Area is achieved. For the Nottingham Core Housing Market Area, 78% of new housing development should be located within or adjoining the Nottingham Principal Urban Area or sustainable urban extensions thereto.

The following table sets out how Gedling Borough needs to meet the RSS requirement of 9,200 dwellings (for the period 2001 – 2026), of which 6,680 is required within or adjoining the PUA, including sustainable urban extensions:-

| | PUA | Non-PUA | TOTAL |
|---|-------------|----------------|--------------|
| Completions between 2001 and 2008 | 1606 | 307 | 1913 |
| Strategic Housing Land Availability Assessment (excluding SUE sites) ¹ | 3541 | 1982 | 5523 |
| TOTAL | 5147 | 2289 | 7436 |
| RSS dwellings required | 6680 | 2520 | 9200 |
| Remaining dwellings required | 1533 | 231 | 1764 |

The remaining balance of dwellings to be found will be required to be met from the three sites identified in the Sustainable Urban Extension study which include:-

- Top Wighay Farm (capacity of 1625 dwellings) (non PUA)
- Papplewick Lane (capacity of 500 dwellings) (non PUA)
- New Farm (900 dwellings) (PUA)

The results from the Strategic Housing Land Availability Assessment (SHLAA) confirm that the number of houses still required is challenging and will not be achievable with the current Principal Urban Area /non Principal Urban Area split. It should also be noted that there are specific problems with the New Farm site, as highlighted within the “Appraisal of Sustainable Urban Extensions” report. The report notes the transport concerns which previously hindered the allocation of this site in the Replacement Local Plan and it should be a condition of development that access to the A60 Mansfield Road is made directly to the east rather than taken northwards and that improvements to the bus network on Mansfield Road should be also made. We understand that the County Council are undertaking a study into potential works to improve the bus network on Mansfield Road but that this is unlikely to report until 2010. The feasibility (or otherwise) of bringing forward the New Farm site will therefore not be clear until at least this time.

¹ This element includes sites with planning permission; sites allocated for housing; sites arising from the Nottingham City Region Employment Land Study; vacant/derelict sites; sites adjacent to rural settlements; land not in residential use; and sites in residential areas.

In deriving the local authority figures, the Proposed Changes simply apply a 19% increase for the HMA to each local authority figure. *No account has been taken of capacity and no policy judgement has been made. As the 2001-08 part of the period has already passed this equates to 24% increase for the remaining period.*

It is considered that the use of the 2004 Household Projections to derive housing provision results in an unrealistically high figure for the Housing Market Area, and the approach is considered flawed because the revised Household Projections have been applied pro rata without any rethinking of the policy approach. The approach assumes what has happened in the past will continue to happen, whether desirable or not. In the case of the Nottingham Housing Market Area, the period reflects a time of high international immigration, and also already reflects existing policy. Projecting forwards in these circumstances is likely to overstate future housing need. It is considered that using a 10 year trend would be more appropriate, as basing future need on the previous 5 years is considered to be too short a period and highly volatile.

The principle of urban concentration which drives the Principal Urban Area /non Principal Urban Area apportionment of housing provision is accepted and supported. However, the weighting for the urban area is much higher for Nottingham than other market areas. No justification has been provided as to why urban concentration figure is what it is. It is viewed that there is a good case for the need for greater flexibility, with 78% being so constraining that it could undermine other aims of the strategy.

The proposed changes continue to class Hucknall as a Sub Regional Centre rather than as part of the PUA. This distinction is important in the context of the priority that is to be given to the Hucknall area in the distribution of development. Significant levels of new development should be located in the Principal Urban Areas but that only appropriate development of a lesser scale should be located in the SRC.

This issue has been raised by Government Office for the East Midlands, who state that functionally and geographically Hucknall is clearly part of the Nottingham Principal Urban Area and does not constitute a Sub Regional Centre in its own right.

Gedling Borough Council consider there is a strong argument for Hucknall to be included within the PUA. Hucknall functions as an integral part of the Nottingham conurbation. One important example of this is the successful construction and operation of NET Line 1 to Hucknall. Inclusion of Hucknall within the PUA would enable full advantage to be taken of the NET Line 1 when locating future development, subject to available capacity on the line and other planning considerations.

Ward data for Hucknall contained in "Housing in the East Midlands" (March 2006) shows that between 34% and 39% of Hucknall's workforce travel to work from Hucknall to Nottingham City.

Irrespective of whether Hucknall is or not within the PUA, it is important that the location of future development in the vicinity of Hucknall is determined on planning

merit rather than on whether specific sites lie within the district boundaries of Gedling or Ashfield.

If Hucknall is not confirmed as being within the Principal Urban Area, then it is important that the implications for the following planning situation in Gedling are taken into account. Gedling Borough has safeguarded land at Top Wighay Farm to the north of Hucknall (an area identified as a suitable site for a Sustainable Urban Extension) which the Replacement Local Plan, on the recommendation of the Inspector, states should be considered as first reserve in the event of Gedling Colliery/Chase Farm and/or other housing sites in the Borough not progressing as quickly as anticipated. The Borough's concern is that the split of its housing provision into Principal Urban Area and non-Principal Urban Area parts would not allow such an approach to be considered in the future even though it has sound planning merit.

It is considered essential that greater degree of flexibility to vary the Principal Urban Area /non Principal Urban Area apportionment is included in the final RSS while still continuing to fully reflect urban concentration principles.

Regional Priorities for Meeting the Housing Needs of the Community

PPS3 emphasises that an adequate supply of affordable housing is important for the performance of the regional economy and to promote social inclusion. The planning system plays a role in increasing the supply of affordable housing, creating a greater choice of housing types and balanced communities. *This priority is supported.*

Policy 14 Regional Priorities for Affordable Housing

This policy identifies that as part of the Local Development Framework, local authorities should adopt affordable housing targets in line with the conclusions of the most up to date Housing Market Assessments for their area. *An evidence based approach is supported.*

Targets do not represent a maximum. The policy now provides a figure rather than a percentage and the figure for the Nottingham Core Housing Market Assessment is 21,200, which equates to 30% of overall provision. *It should be noted that the jointly commissioned Housing Market Assessment 2006/07 provided a figure of 46% for Nottinghamshire. The ongoing Nottingham Core Affordable Housing Viability Assessment will drill down to provide a more specific figure for the Borough and this will report in October 2008.*

Policy 15 Regional Priorities for Affordable Rural Housing

This policy highlights that new housing in rural areas should contribute to creating sustainable rural communities through a choice of well-designed homes. For affordable housing in rural areas, local authorities and housing providers should use all available policy mechanisms to provide new homes, including setting targets for rural affordable housing within their Local Development Frameworks. *This will be a further area for consideration for the Borough Council's Core Strategy.*

Policy 16 Regional Priorities for Provision for Gypsies and Travellers

Minimum additional pitch requirements by local authority area have been derived from up to date Gypsy and Traveller Accommodation Assessments for this policy. *The revised number of pitches for Gedling is four which is supported.*

A Regional Target for the Efficient Use of Land and Buildings for Housing

Planning Policy Statement 3 indicates that a density of 30 dwellings per hectare (net) should be used as a national indicative minimum to guide policy development and decision making until local density policies are in place. *This comment helps provide clarity.*

Policy 17 Regional Priorities for Managing the Release of Land for Housing

In order to meet regional priorities, these joint Development Plan Documents are expected, with the development of joint Core Strategies across the Housing Market Areas particularly encouraged (including Nottingham Core Housing Market Area and Hucknall). *Joint working is supported in principle. However, it is unlikely that the six authorities that make up the Nottingham Core Housing Market Area and Hucknall will be in a position to produce a joint core strategy. The districts are currently working towards an aligned Core Strategy and, therefore, it is suggested that an amendment be made to this policy that would also allow for aligned documents that have a common strategic evidence base.*

Policy 19 Regional Priorities for Regeneration

This policy emphasises that regeneration of all priority areas must conform with the strategy of urban concentration as set out in Policy 3. *As stated previously, the principle of urban concentration is supported.*

Policy 21 Strategic Distribution

A site for strategic distribution has been identified in the Nottingham Core Housing Market Area. *The evidence used to support this inclusion is unclear.*

Policy 22 Regional Priorities for Town Centres and Retail Development

National guidance on retail and the roles of town centres is contained in Planning Policy Statement 6. *The implications of revised Planning Policy Statement 6 and the replacement of the needs test with a more holistic impact assessment is unclear. The focus of growth is to be on maintaining the role of the existing principal urban areas which function as the main retail and service centres and are already well served by transport and other infrastructure. This approach is supported.*

Policy 28 Regional Priorities for Environmental and Green Infrastructure

Green Infrastructure comprises the networks of multifunctional greenspace which sit within, and contribute to, the type of high quality natural and built environment required to deliver sustainable communities. The policy has a clause which notes that within Local Development Frameworks, green infrastructure plans should be developed based on character assessments of existing natural, cultural and landscape assets. *This evidence based approach is supported (see comments on Policy 31).*

Policy 31 Priorities for the Management and Enhancement of the Region's Landscape

This policy now includes a clause on the recognition of the value of tranquillity and dark skies. It highlights the need to identify the landscape and biodiversity protection and enhancement objectives in Local Development Frameworks through the integration of Landscape Character Assessments with historic and ecological assessments. Where not in place, local authorities should prepare Landscape Character Assessments to inform the preparation of Local Development Frameworks. These can also be used to develop Supplementary Planning Documents. *Some detailed county level landscape character assessments have been undertaken. Full regional coverage has yet to be achieved but is being actively pursued. Tranquillity is a significant aspect of landscape character that is often overlooked. The Countryside Agency's research note "understanding Tranquillity" provides useful guidance to LPAs on this issue.*

Policy 32 A Regional Approach to Water Resources and Water Quality

This policy advises that Local Planning Authorities should work with the Environment Agency, water companies and other partners to ensure that Local Development Documents take into account the emerging River Basin Management Plans, Catchment Abstraction Management Strategies and other water resource strategies. The policy also identifies that sustainable drainage techniques will be required to improve water quality where the need is demonstrated through water cycle studies. *It should be noted that a water cycle scoping report is to be jointly commissioned by the conurbation districts to help meet this requirement.*

Policy 35 A Regional Approach to Managing Flood Risk

The extensive national flooding which occurred during the winter of 2000/01 and in the summer of 2007, and the potential impact of climate change have heightened the importance of flooding and land drainage as a fundamental spatial planning issue. This policy stresses that Local Development Frameworks and the strategies of relevant public bodies should take account of the potential impact of climate change on flooding and land drainage and should be informed by Strategic Flood Risk Assessments. *The Greater Nottingham Strategic Flood Risk Assessment, which was published summer 2008, provides conurbation wide information on flooding from all sources, concentrating mainly on the River Trent corridor.*

Policy 35A Regional Priorities for Air Quality

Planning Policy Statements give advice on air quality issues and the relationship between the planning system and other regulatory regimes. Planning Policy Statement 1 requires development plan policies to take account of environmental issues such as air quality and pollution. It also requires that the existing and likely future air quality in an area should be considered in the preparation of Development Plan Documents. This policy states that Local Development Frameworks should contribute to reducing air pollution in the region and consider the potential effects of new developments and increased traffic levels on air quality. *This approach is supported.*

Policy 38 Regional Priorities for Energy Reduction and Efficiency

The planning system can contribute to reducing energy demand through measures to improve the location of development, site layout and building design. As recognised in Planning Policy Statement 1, the planning system expects Development Plan Documents to include policies which promote and encourage a

proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon sources. In drawing up Local Development Frameworks, local planning authorities should take account of the provisions of the annex to Planning Policy Statement 1 on Climate Change and, where policies need to be developed to respond to more local issues, these should be included in Development Plan Documents. *This approach is supported.*

Regional Transport Strategy (RTS)

The Transport White Paper 'The Future of Transport' (2004) emphasises that the growing demand for transport must be managed. While additional infrastructure will be necessary, simply providing ever more capacity on our roads and railways is not the answer in the long term, as the damage to the country's environment, landscape, towns and cities and our quality of life would be unacceptable. The White Paper recognises the crucial role of rail and buses in providing alternatives to the car. Buses are the main form of public transport, particularly in local areas and bus networks are needed to provide flexible and convenient services tailored to local needs, offering a reliable way to travel to and from jobs, schools, shops and other services. This is crucial for people without access to a car and provides a genuine choice for those who do. The importance of walking and cycling is recognised as offering healthy alternatives to the car for short trips.

Regional Transport Strategy Core Strategy

The Regional Transport Strategy policies are designed to encourage modal shift away from the car to more sustainable forms of transport with the development of behavioural change policy. The aim is to secure 20% modal shift with new developments and 5% with existing development.

Policy 50 Regional Priorities for Bus and Light Rail Services

This policy considers the implications of the increased levels of growth and the need to ensure that all major new urban extensions are well served by, and have good access to, high quality public transport. *This approach is supported.*

Policy 56 Regional Priorities for Implementation, Monitoring and Review.

This policy notes that the Regional Planning Body, with the support of local authorities and national and regional delivery bodies, will prepare and keep up to date an Implementation Plan outlining how each policy within the Regional Plan should be implemented and monitored, taking into account the requirement to report on a number of National Core Indicators. *This is supported.*

Part 4 Sub-Regional Strategies

Three Cities Sub-Regional Strategy

The purpose of this Sub-Regional Strategy (SRS) is to provide additional direction and guidance to Local Development Frameworks on issues that cross strategic planning boundaries and other Sub-Regional matters of importance in the Three Cities Sub-area. The Sub-Regional Strategy also takes into account and is consistent with the 3 Cities and 3 Counties New Growth Point designation.

The defined area for the Nottingham Core Housing Market Area includes:

- Broxtowe Borough Council
- Erewash Borough Council

- Gedling Borough Council
- Nottingham City Council
- Rushcliffe Borough Council

In addition, the Sub-Regional Strategy includes the Hucknall wards of Ashfield District that lie within the travel to work area and form part of the Greater Nottingham Partnership. *It is viewed that there are contradictions within the report with regard to how Hucknall fits in and this needs to be clarified.*

The vision for the Principal Urban Area is to provide new jobs, homes, services, community facilities and green and environmental infrastructure in and around them. Paragraph 4.2.9 highlights the role of the Sub-Regional Centres will be maintained through appropriate development. Paragraph 4.2.14 notes that Policy 3 ensures that this will be achieved by concentrating new development in or adjoining the PUAs, and provide for development of a lesser scale in the Sub-Regional Centres.

Policy Three Cities SRS1 Definition of Principal Urban Areas

The Nottingham Principal Urban Area is defined in this policy as including the City, Arnold, Beeston, Carlton, Long Eaton, Sandiacre, Stapleford and West Bridgford. *The definition excludes Hucknall. See comments on **Policy 13** as to the possible revision to the extent of the PUA.*

Policy Three Cities SRS2 Sub-Regional Priorities for Green Belt Areas

The principle of the Nottingham-Derby Green Belt is to be retained. However, a comprehensive review of the most sustainable locations for growth within the Nottingham Core HMA and Hucknall will be required urgently to consider how to accommodate future growth requirements over at least the next 25 years. *This review has in the main been covered by the Sustainable Urban Extension study, which reported in March 2008.*

Sub-Regional Housing Priorities – Nottingham Core Housing Market Area (and Hucknall – addition)

In the Nottingham area, sustainably located urban extensions will need to be considered following the review of land in the Nottingham HMA and Hucknall proposed in Three Cities Policy 2.

Policy Three Cities SRS3 Housing Provision (see comments for **Policy 13)**

For the Nottingham Core Housing Market Area and Hucknall, the total requirement is given as 74,050 dwellings, of which 54,720 should be within or adjoining the Nottingham Principal Urban Area. For Gedling Borough, this equates to 9,200 dwellings, of which 6,680 should be within or adjoining the Nottingham Principal Urban Area, including sustainable urban extensions as necessary.

Conclusions

It is considered that the Borough Council should, in view of the above comments, offer general support to the Proposed Changes to the East Midlands Regional Plan. It will provide a strategic framework within which Gedling can progress its Local Development Framework. However, there are a few specific concerns, relating in

particular to the increased housing numbers and the Principal Urban Area / non Principal Urban Area division as detailed in the report.

This report should therefore form the basis of the submission as the Borough Council's response to the Government Office on the Proposed Changes to the East Midlands Regional Plan.

Recommendations

Cabinet resolve to endorse the above report to form the basis of submission as the Borough Council's response to the Government Office on the Proposed Changes to the East Midlands Regional Plan.