



Report to Cabinet

Subject: East Midlands Regional Plan: Partial Review – Options Consultation

Date: 1st October 2009

Author: Planning Policy Manager on behalf of Head of Strategy & Performance and Head of Planning & Environment

Purpose of the Report

To authorise a response to the Partial Review to the East Midlands Regional Plan which has been issued for consultation by the deadline of 8th October 2009, in accordance with the Borough Council's corporate objective to enhance the physical environment of the Borough.

Background

The current version of the Regional Plan was published by the Secretary of State on 12th March 2009. The Government then requested that the Regional Assembly undertake a further Partial Review of the Regional Plan focusing on housing, transport and climate change. Members will recall the paper that was taken to Cabinet in December 2008 which considered the project plan for consultation on the Partial Review. It was also highlighted in that paper that it was considered that the Partial Review was premature, with the timing conflicting with the current work being undertaken on the Core Strategy. As the Partial Review is looking post 2021 it will not accelerate the delivery of housing in the short term which was one of the reasons for embarking on the review in the first place. A preferred timescale is considered to be after approval of the Core Strategy.

It should be noted that a response on the Partial Review was endorsed by the Greater Nottingham Joint Planning Advisory Board in September 2009 with the broad conclusions emphasising the concern that it is inappropriate to review the Regional Plan now, in advance of aligned Core Strategies being prepared.

This review focuses on the period after 2021 and is restricted to the following issues that impact on the Borough Council:-

1. Household projections;
2. Approaches to affordable housing;
3. Future development options;
4. Transport objectives; and
5. Renewable energy and Housing Market Area carbon reduction targets.

Household projections

- The Regional Plan sets a target of 21,500 new homes per year for the East Midlands which is based on 2004 household projections
- The National Housing and Planning Advice Unit identifies that between 23,400 – 24,600 new dwellings are needed per year for the Region
- 2006 household projections indicate that the East Midlands will be the fastest growing region in England and that there is a need for 28,000 new homes per year for the Region

There are three key reasons for household growth. Firstly, single person households will make up a higher proportion of all households mainly due to the effects of an ageing population. The second component is natural change in population growth resulting from more births than deaths. The final reason is due to net in-migration from other parts of the UK and from beyond the UK, including Europe.

As highlighted in the report to Cabinet back in December 2008, there are concerns over the reliance on household projections to derive housing numbers as these are likely to over-inflate the number of new homes required for the following reasons:-

- a) their use assumes what has happened in the past will continue to happen, whether desirable or not. In the case of Greater Nottingham, the period on which the 2006-based projections reflects a time of high international in-migration. Projecting forward in these circumstances is likely to overstate housing need.
- b) they are based on looking back over five year periods. Trends over shorter periods are highly volatile and a ten year period would be more appropriate. Whilst this would still result in an increased housing provision figure it would moderate some of the short term effects.

Approaches to affordable housing

The Partial Review proposes three approaches to affordable housing for after 2021, including:-

- Extend the current approach – new targets consistent with the current Regional Plan approach;
- Needs based approach – identify areas of need for affordable housing based on affordable dwellings per 1000 dwellings; and
- Evidence based approach – use up to date local information to set short-term targets in line with Housing Market Area Assessments or other relevant information.

The evidence based approach at a local level is considered to be the most appropriate. This would allow a more locally based and flexible policy based

on robust local evidence reflecting viability issues. Building targets should be decided locally by an accountable Local Planning Authority and according to the needs of the districts, residents and its future prosperity.

Future development options

The Partial Review provides an overview of the type of development options considered to be realistic alternative ways for planning for a growing population across the East Midlands region. The options considered for the Nottingham Core Housing Market Area plus Hucknall include:-

- **Option 1** Continue with the focus on development and regeneration in the Principal Urban Area and Sub-Regional Centres of Hucknall and Ilkeston;
- **Option 2** Focus on regeneration of the Principal Urban Area;
- **Option 3** Focus development at public transport nodes; and
- **Option 4** Development of a large new settlement.

Option 1 Given that 2021 will be less than ten years after the proposed adoption of the aligned Core Strategies, it is viewed that a radical change of strategy is not appropriate or justified. It is viewed that continuing with the current approach and established strategy is preferred, providing certainty with the adopted Regional Plan. However, the inflexible division of dwelling numbers between the Principal Urban Area and non Principal Urban Area will result in Gedling Borough eventually exhausting the supply of sites within and around the Principal Urban Area. The capacity of the Principal Urban Area requires further work as there are some absolutes that should not be compromised, including, amongst others: flooding; biodiversity and opportunities for green infrastructure. It is questioned as to when the Principal Urban Area will reach capacity and at what point does the conurbation become too big. While in principle the focus should be on sites in and around the Principal Urban Area there does need to be an element of realism in the strategy and the availability of sites needs to be considered. In addition, greater clarity is requested from the Partial Review as to what is considered to be a suitable level of growth for the Sub Regional Centres. Overall it is viewed that Option 1 would be preferred but with an element of more flexibility as in Option 3 (as outlined below).

Option 2 Concentrating growth on the Principal Urban Area is likely to result in densities increasing on brownfield sites, placing more pressure on the City and key open spaces. The phasing of brownfield development would be crucial to reduce the vulnerability of easier to develop greenfield options. Whilst this approach supports Sustainable Urban Extensions, there are limited opportunities within or adjoining the Principal Urban Area in Gedling Borough. Development within the Borough is constrained by a number of physical factors including ridgelines, the Mature Landscape Area around Lambley and flood risk from the River Trent. It is considered that artificially constraining the Sub Regional Centres will result in an increasing reliance on the City Centre as a destination for work/leisure and increased pressure on open spaces within the Principal Urban Area. Such an approach reduces flexibility to

allocate sites and does not maximise the transport opportunities available within the Sub Regional Centres. Some other well located settlements have opportunities for growth which recognises the importance of the need for an element of some dispersal.

Option 3 Focusing on public transport nodes relies heavily on the quality of transport infrastructure but would help to reduce the number of trips made by private transport. One key constraint would be the reliance on private sector operators but there would be potential for developments to make use of existing or improved transport systems (the tram or underused train lines). This approach would need to be supported by a high degree of intervention encouraging behavioural change and the required modal shift. It is considered that this option would be best considered in combination with option 1.

Option 4 A new settlement (i.e. an ecotown) is a high risk strategy which would undermine the existing strategy of urban concentration and regeneration. However, such an approach would provide a blank canvas for a potentially truly sustainable community to be developed. The future social mix of any potential ecotown would need to be driven by employment to avoid it becoming a commuter village.

Transport Objectives

The Partial Review outlines the national and regional priorities (Delivery of Sustainable Transport System (DaSTS)) with the Housing Market Area level objectives to be identified later. The regional priorities include:-

1. Less (unsustainable) travel – minimise traffic levels, reduce congestion and reduce negative impacts of travel and transport on people and the natural environment;
2. Effective and efficient travel – quicker, more convenient travel to and from the main areas of economic activity, health, cultural, leisure and recreational facilities and improved road safety; and
3. Energy efficient travel – maximise energy efficiency within the transport sector.

The Partial Review continues to identify a number of challenges that will need to be met in order to achieve the goals. These include matters such as identifying ways to reduce deaths and injury, overcoming gaps in the network and overcoming barriers to access the network.

Renewable energy and Housing Market Area carbon reduction targets

The Partial Review proposes to set out carbon reduction targets and provide guidance for the probable mix of technologies required to meet the target. For the Nottingham Core Housing Market Area the aim is to deliver more from heat networks rather than on-site renewables.

The Partial Review does discuss the contribution that retro-fitting existing buildings will make to carbon reduction targets but does not seem to take this into account when monitoring against the target. This is considered to be a

missed opportunity as the Partial Review does highlight that the existing houses will still form the majority of the housing stock.

The Partial Review also questions how heat from electricity generation can be used to meet local heating requirements. This is likely to be through Combined Heat and Power facilities and on site renewables and could include solar water heating, photovoltaics, small scale wind, biomass and ground source or air source heat

As part of the consultation EMRA are seeking specific responses to questions, and these responses are shown in Appendix 1.

Conclusions

In line with previous comments made on the Partial Review, it is considered that this review is premature in advance of the current work being undertaken on the Core Strategy. Notwithstanding that fact, it is recommended that this report form the basis of the Borough Council's response to the specific questions raised to inform the Partial Review of the East Midlands Regional Plan.

Recommendation

Cabinet resolve to endorse the report to form the basis of the Borough Council's response to the Government Office on the Partial Review of the East Midlands Regional Plan.

APPENDIX 1

CONSULTATION QUESTIONS

Gedling Borough Council response is in *italics*

Housing Provision Question 1

Is there additional evidence on demographic and migration issues that you would like the Regional Assembly to consider as part of the Partial Review?

The method of forecasting housing provision figures based on 2006 household projections is questioned as they are likely to over inflate the number of new homes required (as explained earlier in the report).

Housing Provision Question 2

Is there evidence on affordability issues that you would like the Regional Assembly to consider as part of the Partial Review?

No

Housing Provision Question 3

Is there any other evidence on housing issues that you would like the Regional Assembly to consider as part of the Partial Review?

No

Meeting Community Housing Needs Question 1

Which of the three main options outlined should be used as the basis for setting targets for affordable housing provision for the period 2021 – 31 and why?

Option 3 - evidence based approach at local level. Building targets should be decided locally by an accountable local authority and according to the needs of the district's residents and its future prosperity.

Meeting Community Housing Needs Question 2

What additional actions could the Regional Plan include to help maximise affordable housing delivery, particularly in smaller settlements in rural areas?

No suggestions. Many of the actions at para 2.23 seem to be actions for local government, rather than regional government.

Meeting Community Housing Needs Question 3

Should the Regional Plan provide guidance on the provision of specialist housing for older people, and if so what form should this take?

No. There is already plenty of national level guidance and research into the needs of older people, and planning/construction decisions should be taken at local community level, in consultation with the people who form the potential market for a new scheme. There is already an East Midlands Older Persons

Housing Needs Study and it is viewed that further work on this at regional level is a duplication of effort.

Spatial Development Options Question 1

Are these the right types of spatial development options for the East Midlands?

The current Housing Market Area approach is focusing development and regeneration in the Principal Urban Area and the Sub Regional Centres of Hucknall and Ilkeston. Given that 2021 is less than ten years after the proposed adoption of the Core Strategy, a radical change in strategy is not justified or appropriate. However, the Spatial Development Options proposed are not based on a scale of growth and therefore some deviation from the current approach may be inevitable.

Spatial Development Options Question 2

Should any other spatial development options be considered for the Region? If so please explain and provide evidence to support these options.

See response to Spatial Development Options question 1.

Housing Market Area Question 1

Which of the four spatial planning and development options will best meet the needs of the HMA from 2021 and why?

Given that 2021 will be less than ten years after the proposed adoption of the aligned Core Strategies it is viewed that a radical change of strategy is not appropriate or justified. Providing a high percentage of new dwellings in or next to the Principal Urban Area assists the option of urban concentration and regeneration but significantly limits the sites that can be brought forward for development in more rural areas of Greater Nottingham. Previous comments regarding the degree of flexibility between development located within or adjacent to the Principal Urban Area remain relevant and the role of the Sub Regional Centres of Hucknall and Ilkeston is also key and requires further clarification. From the given options, Option 1 with an element of more flexibility as in Option 3 would be preferred.

Housing Market Area Question 2

Should any other options be considered? If so please explain and provide evidence to support these options.

See response to Housing Market Area question 1.

Transport Question 1

Do the regional level outcomes set out provide a sound basis for the review of the regional Transport Strategy?

It is considered that more emphasis on reducing the need to travel in order to meet the goal of reducing transport emissions of carbon dioxide is required.

Transport Question 2

Do the regional level challenges set out provide a sound basis for the identification of regional transport investment priorities?

The challenges appear to be comprehensive.

Transport Question 3

If the proposed structure for the revised Regional Transport sound and fit for purpose?

It is viewed that the proposed structure is consistent with national and local issues.

Renewable and Low Carbon Energy Generation Question 1

What is the most appropriate mix of renewable and local carbon energy generation for the East Midlands as a whole and why?

It is considered that there is not one solution that can be applied across the region as there will be variances between different areas.

Renewable and Low Carbon Energy Generation Question 2

What is the most appropriate strategy for carbon emissions reduction in each of the Region's 10 Housing Market Areas and why?

It is viewed that the Nottingham Core Housing Market Area should take advantage of its dense urban form and make use of Heat Networks and on-site renewables. Retrofitting energy efficiency measures to existing houses will be essential.

Renewable and Low Carbon Energy Generation Question 3

How can heat from electricity generation be used to meet local heating requirements and how can this be delivered most effectively?

This can be through the use of Combined Heat and Power facilities to provide heating in homes and other buildings, which is most effective in denser development areas. In addition, use should be made of on site renewables such as electricity and heat technologies situated mainly on or near specific buildings.