

Meeting **JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT**

Date **18th SEPTEMBER 2009** Agenda item number

From **JOINT OFFICER STEERING GROUP**

STRATEGIC PLANNING UPDATE

Purpose of Report

- 1 To inform the Committee about the East Midlands Regional Plan Partial Review consultation and of the authorities response.

Regional Plan (Regional Spatial Strategy) Partial Review

- 2 Members were informed at the Joint Committee on the 17 July 2009 that the East Midlands Regional Assembly had commenced a consultation on options for the Regional Plan Partial Review.
- 3 This consultation document represents the next stage of the Partial Review process. It sets out a range of options and questions on a number of key issues, including:
 - options for future development from 2021 onwards; focusing on Housing Market Areas and based on higher housing projections;
 - approaches to setting affordable housing targets beyond 2021
- 4 The Partial Review sets out transport objectives described as challenges which are to be applied to each Housing Market Area to produce 'outcome priorities' for each one.
- 5 The Partial Review also addresses low carbon and renewable energy generation and the apportionment of aggregates extraction by county up to the period 2021.
- 6 The Nottingham Core Housing Market Area options are described as:
 - a) continue with the current strategy of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston.
 - b) focus on regenerating the Principal Urban Area of Nottingham.
 - c) focus development at transport nodes with good accessibility to the Principal Urban Area of Nottingham.
 - d) concentrate the majority of new development into a large new settlement.

Appendix 1 sets out in full the section on the Nottingham Core options.

- 7 This report highlights key issues of concern to both authorities. Individual authority responses to the Partial Review Options consultation have been considered by cabinet at Nottinghamshire County Council (Appendix 2) and are to be considered by the Portfolio Holder for Neighbourhood Regeneration at Nottingham City Council (Appendix 3). The authorities will also have an opportunity to present their advice, as Section 4(4) authorities, to the Regional Assembly in October 2009, in the light of the responses to the wider consultation.

Timing

- 8 Nottinghamshire County Council and Nottingham City Council have previously expressed concerns to the Regional Assembly on the timing of the Partial Review.
- 9 The timing conflicts with the work on aligned Core Strategies currently being undertaken by the Districts and the City Council. The Councils are currently focused on testing the implications of the adopted Regional Plan and there needs to be a period to allow core strategy development before introducing further uncertainty.
- 10 Although the Partial Review concentrates on the period post 2021 its preparation coincides with and therefore has implications for preparation of the Aligned Core Strategy for Greater Nottingham. It is still considered inappropriate to review the Regional Plan now and the Partial Review should therefore be deferred.
- 11 The timing is also premature in advance of the Government's new 'Delivering a Sustainable Transport System' approach which seeks to provide a new national, regional and sub regional transport planning framework.
- 12 The timing of the Review results in insufficient time to prepare a credible evidence base prepared. As the Partial Review looks post 2021 there is plenty of time for the matters to be considered in a single Regional Strategy prepared jointly by the East Midlands Development Agency and the proposed Local Authorities Leaders' Board following the implementation of the Sub National Review proposals in April 2010.

Housing Market Area options

- 13 The current HMA approach is of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston. Given that 2021 is less than 10 years after the proposed adoption of the aligned Core Strategy, a radical change of strategy is not appropriate or justified.

- 14 The four Spatial Development Options put forward do not imply a particular scale of growth for the HMA or derive from the capacity of the HMA.
- 15 A growth level beyond 2021 similar to the adopted Regional Plan may be able to be achieved through a hybrid option of mainly urban concentration and regeneration, but more closely reflecting the findings of the Sustainable Urban Extensions study 2008 and a proposed study of wider locations, by increasing the role of the two Sub-Regional Centres of Hucknall and Ilkeston and development at other important transport nodes (including within the urban area). A level of growth which is too high could compromise this approach, and result in unwanted town cramming, a too dispersed pattern of growth or could require a new settlement.

Transport objectives

- 16 Officers of the City and County Councils have been working closely with the Regional Assembly in drawing up the transport objectives in the Partial Review, and these are supported.

RECOMMENDATION

It is Recommended that the Committee note the contents of the report.

Contact Officers

Sally Gill
Communities – Nottinghamshire County Council
Tel: 0115 9774537
sally.gill@nottscc.gov.uk

Paul Tansey,
Environment and Regeneration – Nottingham City Council
Tel 0115 9155491
paul.tansey@nottinghamcity.gov.uk

APPENDIX 1

**The EMRP Partial Review Options Consultation document extract :
Nottingham Core HMA pages**

(Nine sides printed in landscape format)

6 Nottingham Core HMA

Nottingham Core HMA Overview

The Area

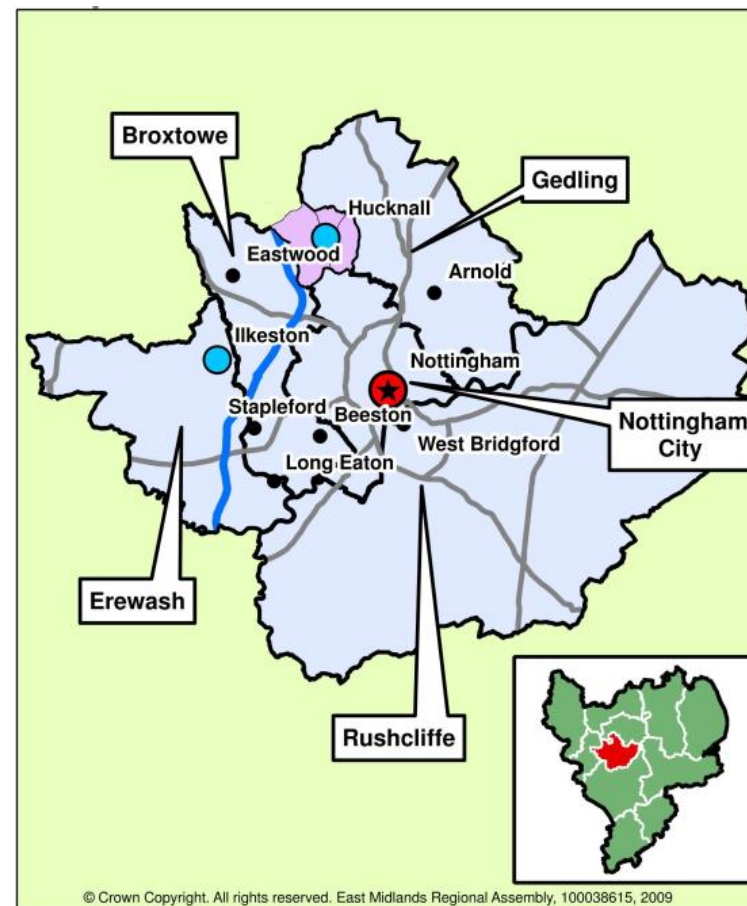
- The Nottingham Core Housing Market Area is based on the local authority areas of Nottingham City, Rushcliffe, Gedling, Broxtowe, and Erewash and includes the four wards of Hucknall (in Ashfield) that adjoin the Principal Urban Area.
- The Principal Urban Area includes the city of Nottingham (including Clifton), Arnold, Beeston, Carlton, Long Eaton, Sandiacre, Stapleford, and West Bridgford.
- Nottingham is surrounded by Green Belt, primarily aimed at preventing the coalescence of Nottingham, Derby and their associated towns.

Population

- Total population in 2006 was 727,100, the second highest of all the HMAs.
- The HMA has experienced a slower than average rate of population growth over the decade 1996 to 2006 at 2.7 per cent compared to a regional average of 6.2 per cent.
- The universities are a significant attraction to younger people moving into Nottingham.

Housing

- The north-western half of the HMA has relatively low house price to income ratios which contrasts with the south-eastern half where the opposite is true.
- Nottingham and Erewash have a higher than national average of homelessness.
- Construction rates for housing over recent years are lower than proposed targets.
- The delivery of affordable housing will have to increase significantly to meet need.



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- House prices rises in all sectors have caused affordability problems for many.
- Low price areas can also be identified as a symptom of unpopular housing areas or types, and a sign of low or changing demand.
- Those in higher socio-economic groups tend to move out of the city, possibly leading to social polarisation and housing market dysfunction in some areas. This is not necessarily 'city flight' but movements out of inner areas.
- Employment rates are 3.6 percentage points lower than the regional average at 72.3 per cent in 2007 average.
- The HMA accounts for 10 per cent of the regional business stock with 14,465 local units registered for VAT or PAYE in 2007.
- There is a strong service sector presence including education (including two universities in Nottingham), health, public administration and business services.
- The qualifications of economically active adults are significantly above the regional average.
- Nottingham has the highest level of net in-commuting, with over 70,000 more people coming into the HMA than leaving, and 54 per cent of people that work in the HMA, do not live there.
- The manufacturing sector has declined but remains important.
- There are generally high workplace based earnings but Nottingham City has the lowest residence based earnings in the Region.

Transport

- M1 improvements will provide some additional capacity to cater for growth.
- Large scale transport interventions will be required in the city to enable development to take place in a sustainable way.
- Capacity increases will need to concentrate on linking the proposed infill and urban extensions to the city centre and improving orbital links between the outer suburbs.
- Hucknall has potential to take advantage of the existing NET line.
- Proposed Workplace Parking Levy could create a fund to encourage non-car travel modes.
- More city centre living will encourage people to live closer to their work and help to reduce the amount of long distance in-commuting.
- East Midlands Airport expansion plans will provide employment, travel and economic opportunities but it will be essential to provide an adequate level of surface access capacity to fully exploit these benefits.

Economy

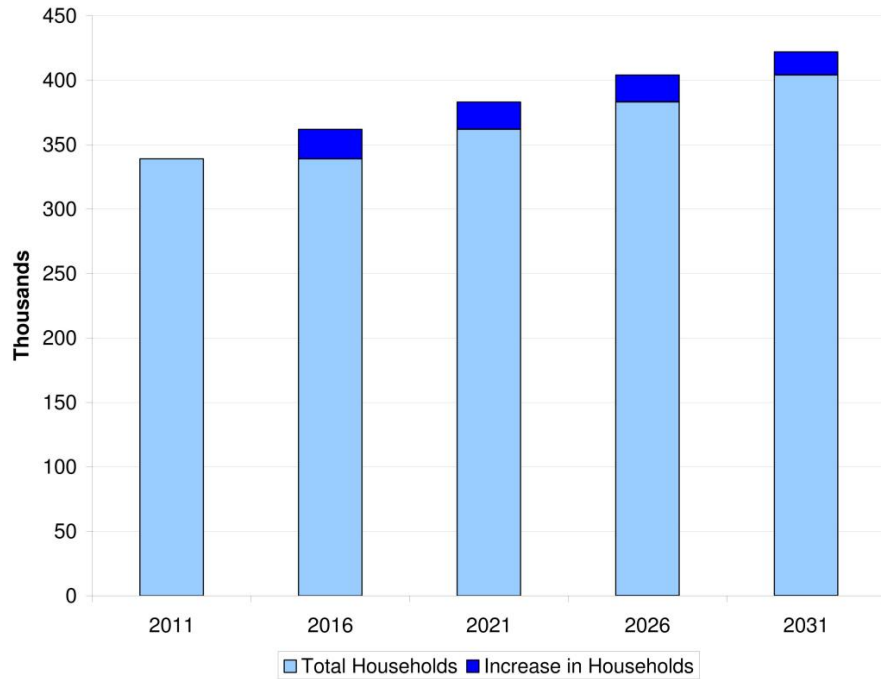
- Nottingham is a key economic driver of the regional economy, accounting for £7.3bn of output (as measured by Gross Value Added) in 2006.

Environment

- There are no internationally designated nature conservation sites, and only a small number of nationally designated sites.
- There is significant historic interest including a number of attractions including Nottingham Castle and many historic homes.
- Water resources in the north of the HMA are over-abstracted, and general water supply deficits may occur.
- The Trent Valley, including potentially parts of Nottingham, are at significant risk of flooding.
- A Water Cycle Study is being produced for the area.
- Nottingham, Erewash, Broxtowe and Rushcliffe have designated Air Quality Management Areas.

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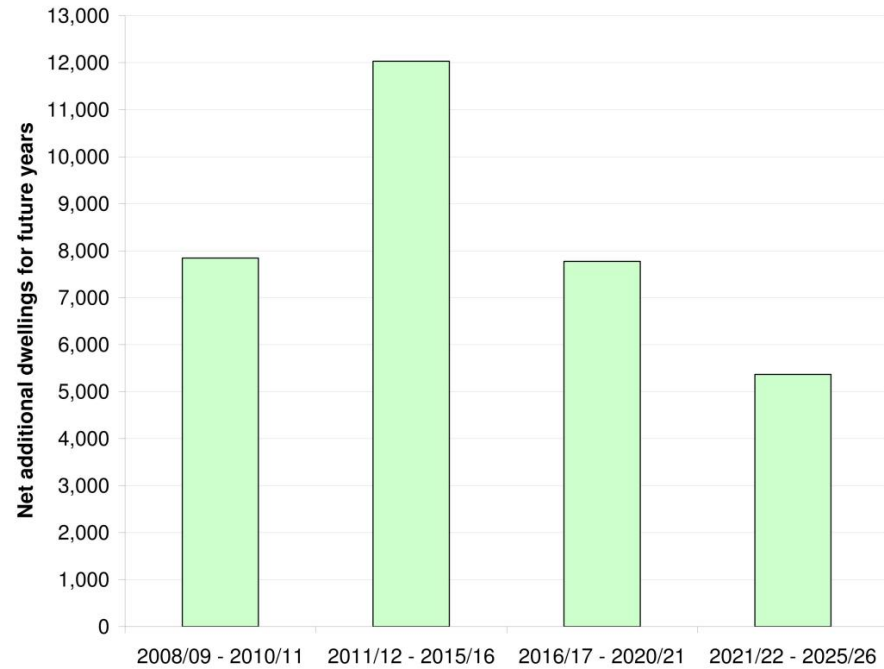
Housing Demand - 2006-based Household Projections ⁽¹⁾



Notes

- Sub-regional household projections are less robust than those at the regional level and are not National Statistics.
- HMA figures have been calculated by summing their districts

Housing Land Supply - Net Additional Dwellings for Future Years ⁽²⁾

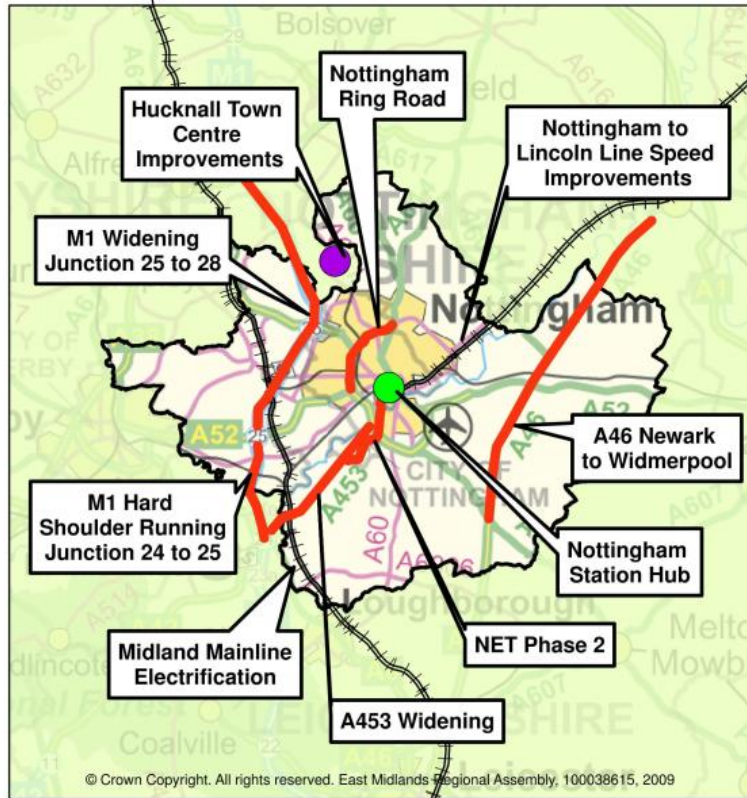


Notes

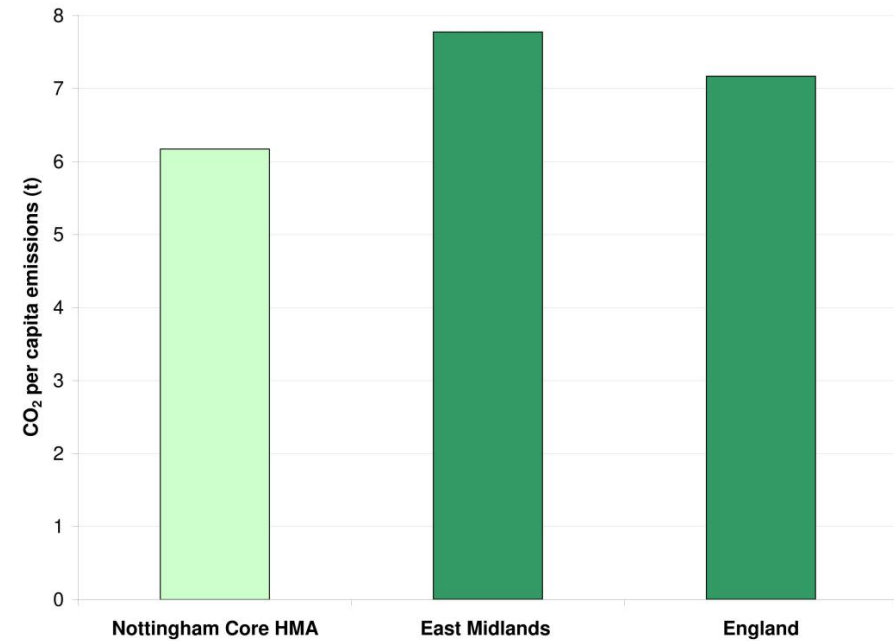
- Not all districts provided data up to 2025/26
- HMA figures have been calculated by summing their districts

6 Nottingham Core HMA

Transport - Planned Infrastructure



CO₂ Emissions ⁽³⁾



Notes

- Data supports the National Indicator 186: Per capita CO₂ emissions in the local authority area.

1. Source: Communities & Local Government - www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/householdestimates/livatables-households
 2. Source: Local Authorities
 3. Source: Defra - www.defra.gov.uk/environment/localgovindicators/ni186.htm

6 Nottingham Core HMA

Option 1

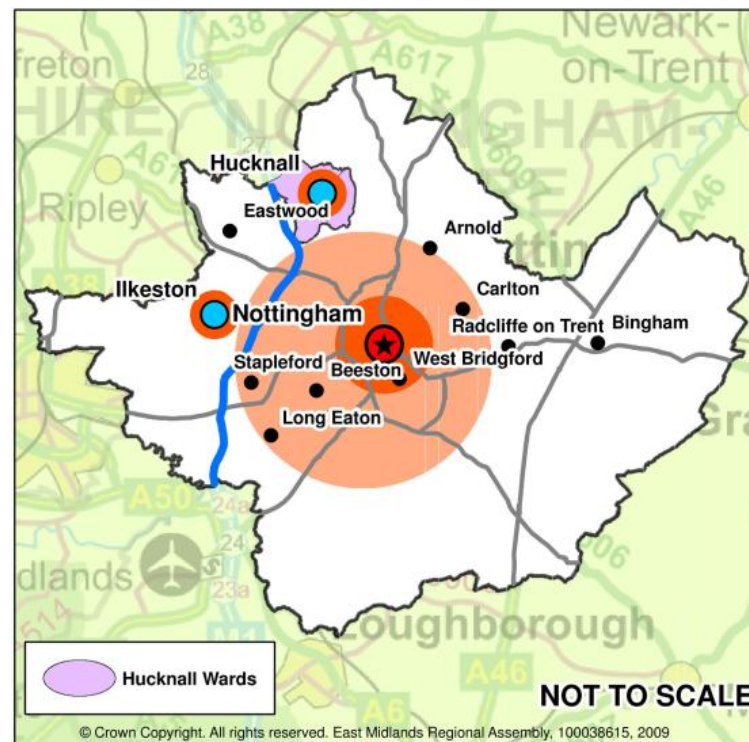
Continue with the current strategy of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub-Regional Centres of Hucknall and Ilkeston.

This planning and development option:

- Promotes Nottingham and its urban area as the major focus for development, investment and regeneration.
- Promotes Sustainable Urban Extensions adjoining the Principal Urban Area of Nottingham.
- Allows for an appropriate scale of development at Ilkeston and Hucknall.

The main implications of this option are:

- Enables existing development, regeneration and infrastructure plans to be continued and completed.
- It will require the identification of additional Sustainable Urban Extensions.
- The strategy might not be able to cope sustainably with continued high growth targets towards 2031.



6 Nottingham Core HMA

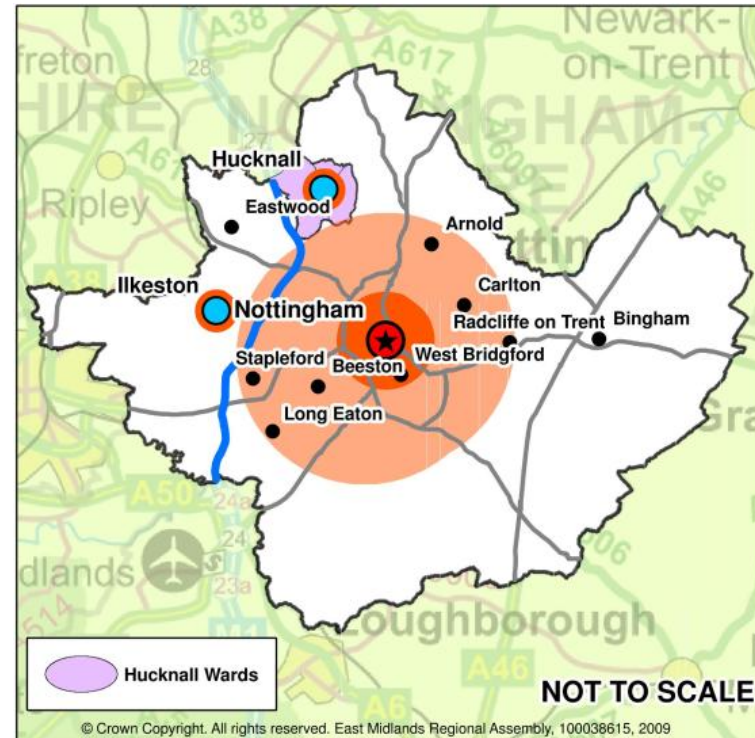
Option 2**Focus on regenerating the Principal Urban Area of Nottingham.**

This planning and development option:

- Concentrates most development, investment and regeneration activity at Nottingham and its urban area.
- Promotes Sustainable Urban Extensions adjoining the Principal Urban Area of Nottingham.
- Limits development in the Sub-Regional Centres of Hucknall and Ilkeston.

The main implications of this option are:

- It would necessitate significant investment in the redevelopment of brownfield sites and the creation of Sustainable Urban Extensions.
- It could help to build the critical mass of the city and enable a focus on infrastructure investment priorities.
- It could have negative impacts on the Sub-Regional Centres.
- The strategy might not be able to cope sustainably with continued high growth targets towards 2031.



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Option 3

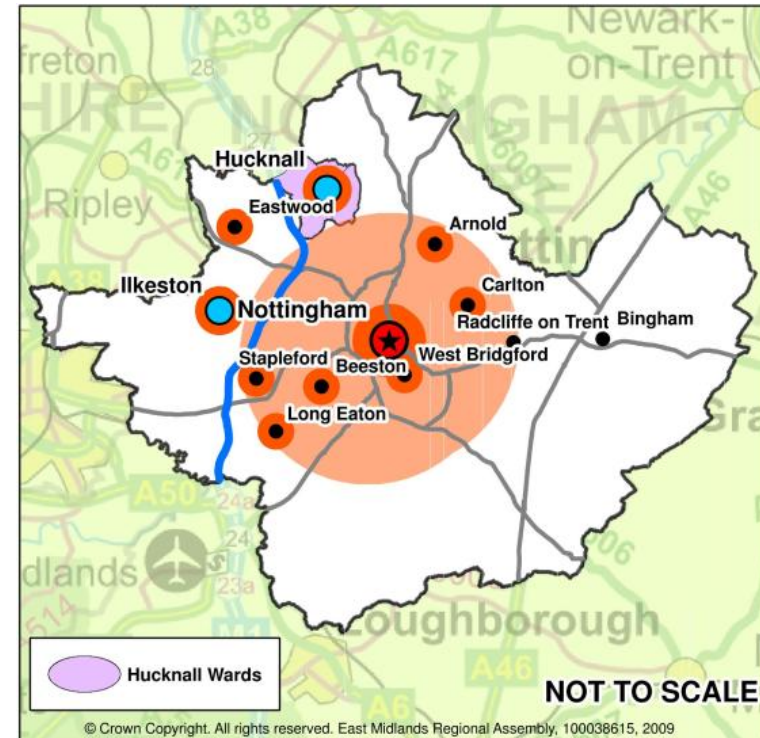
Focus development at transport nodes with good accessibility to the Principal Urban Area of Nottingham.

This planning and development option:

- Promotes development and regeneration in areas that are focal points on the road and public transport network.
- Development would be based in places where existing or improved transport infrastructure could ensure good connections within and between settlements.
- New development would need to facilitate improvements to the transport infrastructure.

The main implications of this option are:

- It could promote more travel demand and mobility through improving accessibility within the urban area and between other settlements.
- It would require significant investment in sustainable transport infrastructure.



6 Nottingham Core HMA

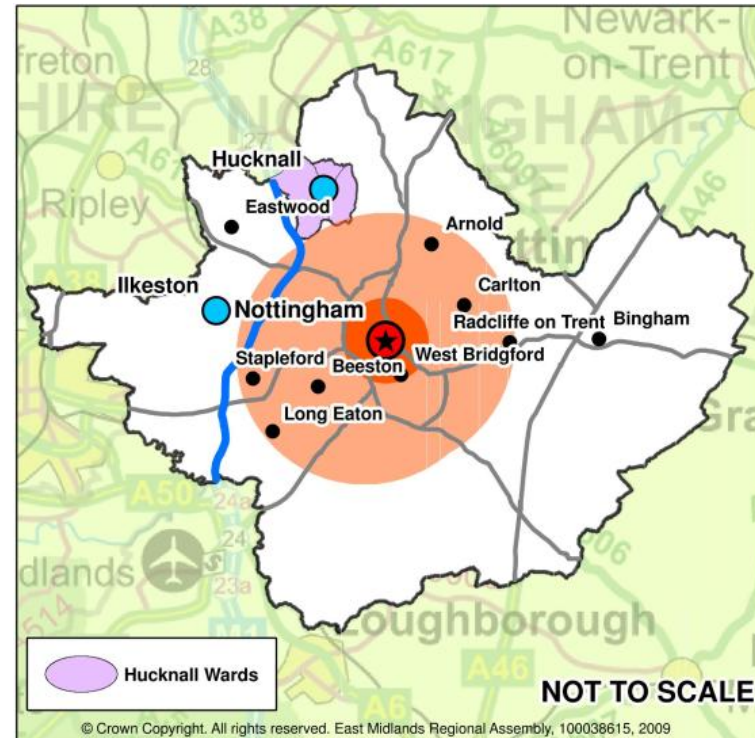
Option 4**Concentrate the majority of new development into a large new settlement.**

This planning and development option:

- Promotes the creation of a free-standing new settlement as a focus for the majority of new development.
- Allows high standards of sustainability to be incorporated from the start of the development process.
- Needs to be well connected to the rest of the area.
- Would need to include employment opportunities and local services, and be capable of connection to the transport network.
- A suitable location would need to be found through planning processes.
- Provides for the ongoing regeneration of Nottingham and its Sub-Regional Centres.

The main implications of this option are:

- Potential impacts on the regeneration of Nottingham and its Sub-Regional Centres.
- Potentially long timescales for planning and developing the settlement, but these may help to meet longer term development needs.
- Potentially high costs for meeting infrastructure needs, but these may be able to be met through the actual development.
- Potential difficulty in identifying a suitable location.
- Potential impacts on the environment if major areas of green field land are to be developed.



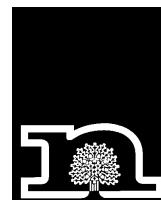
6 Nottingham Core HMA

Nottingham Core Housing Market Area Question 1

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

Nottingham Core Housing Market Area Question 2

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



meeting Cabinet

date 16th September 2009

agenda item number

Report of the Deputy Leader

East Midlands Regional Plan : Partial Review – Options Consultation

Purpose of the Report

1. To seek approval for comments set out in this report to be sent to the East Midlands Regional Assembly on the Options Consultation for the East Midlands Regional Plan Partial Review.

Introduction

2. The East Midlands Regional Assembly has commenced consultation on Options for the Regional Plan Partial Review. The consultation period runs from the 30th June to the 6th October. The Cabinet Member for Environment and Sustainability attended the launch event on the 30th June.
3. This consultation document represents the next stage of the Partial Review process. It sets out a range of options and questions on a number of key issues, including:
 - options for future development from 2021 onwards focusing on Housing Market Areas and based on higher housing projections
 - approaches to setting affordable housing targets beyond 2021
4. The Partial Review sets out transport objectives described as challenges which are to be applied to each Housing Market Area to produce 'outcome priorities' for each one.
5. The Partial Review also addresses low carbon and renewable energy generation and the apportionment of aggregates extraction by county up to the period 2021.
6. A series of workshops has been held for stakeholder authorities, agencies and others to describe and discuss the options. This work will help the Assembly prepare a preferred option. The County Council will also have an opportunity to present its advice, as a Section 4(4) authority, to the Regional Assembly in October, in the light of the responses to the wider consultation and workshops.

Key Issues

Timing

7. Nottinghamshire County Council has previously expressed concerns to the Regional Assembly on the timing of the Partial Review. It is still considered inappropriate to review the Regional Plan now and the Partial Review should be deferred. The Yorkshire and Humberside Region has decided not to review their regional spatial strategy but to commence work on their Regional Strategy, a similar process could be also followed in the East Midlands.
8. The timing conflicts with the work on Core Strategies currently being undertaken by Nottinghamshire districts and the City Council. The councils are currently focused on testing the implications of the adopted Regional Plan through their local development frameworks.
9. Although the Partial Review concentrates on the period post 2021 its preparation coincides with and thus has implications for preparation of the core strategy in Nottinghamshire. It is still considered inappropriate to review the Regional Plan now and the Partial Review should therefore be deferred to allow progress on core strategies before introducing further uncertainty.
10. The timing is also premature in advance of the Government's new 'Delivering a Sustainable Transport System' approach which seeks to provide a new national, regional and sub regional Transport planning framework.
11. The timing of the Review results in insufficient time to prepare a credible evidence base. As the Partial Review looks post 2021 there is plenty of time for the matters to be considered in a single Regional Strategy prepared jointly by emda and the proposed Local Authorities Leaders' Board following the implementation of the Sub National Review proposals in April 2010.

Housing Market Area Options

12. The Options consultation sets out options for development for each of the housing market areas in the Region. The options for each of the Housing Market Areas covering Nottinghamshire are set out in Appendix 1. The spatial development options put forward for the HMAs will need to accommodate a potential higher level of growth that being considered at regional level.
13. There is some concern that higher levels of growth (based on household projections) are inappropriate to plan for. There are two principal reasons to suggest conservative approach to overall housing growth; that house building in the medium term will not achieve such high levels as in the

recent past, and this needs to be accounted for, and secondly, there will be longer-term effects deflating in-migration and also impacting on future projections. This is reflected in the Council's response in Appendix 2.

14. The first spatial development option for each of the three housing market areas in Nottinghamshire is a continuation of the current strategy and this may be able to accommodate some higher growth beyond 2021. The spatial development options put forward do not represent any particular scale of growth or derive from any capacity assessment of the HMA; they suggest different ways of distributing development.
15. The Partial Review focusses beyond 2021 which will be less than ten years after the adoption of many of the districts' core strategies; therefore a radical change of strategy is not necessary.

Nottingham Core HMA

16. The current HMA approach is to focus development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston.
17. A growth level beyond 2021 similar to the adopted Regional Plan may be able to be achieved through mainly urban concentration and regeneration (Option 1), but more closely reflecting the findings of the Sustainable Urban Extensions study 2008 and a proposed study of wider locations, by increasing the role of the two Sub-Regional Centres of Hucknall and Ilkeston and development at other important transport nodes (including within the urban area) (Option 3). A level of growth which is too high could compromise this approach, and result in unwanted town cramming, a too dispersed pattern of growth or could require a new settlement.

Nottingham Outer HMA

18. The current strategy is to focus development and regeneration in and adjoining the Sub-Regional Centres of Mansfield-Ashfield and Newark.
19. Developing an emphasis on growth in the Western side of the HMA, plus the Newark growth point (option 3) has merit, but this should not overlook the potential for regeneration and growth in some villages in Newark and Sherwood, especially Ollerton-Boughton. The potential of sustainable development around the rail-served settlements in the HMA should also be utilised.

Northern HMA

20. The current strategy is to focus development and regeneration in and adjoining the Sub-Regional Centres of Chesterfield and Worksop.
21. Sustaining regeneration for the area is a prime objective that should be delivered best by enhancing the roles of smaller settlements, recognising the various roles of settlements in supporting employment locally, or

sustainable commuting to larger centres, some of which may be outside the HMA (such as Mansfield, Nottingham or Sheffield). This approach, which incorporates Options 2 & 4, could also accommodate higher growth, but only as long as the economy could sustain it, and assist in reducing out-commuting.

Transport

22. The Partial Review utilises the Government's new 'Delivering a Sustainable Transport system (DaSTs) approach to set out eleven Transport Objectives described as Regional Challenges and Travel Outcomes from those challenges which are to be applied to each Housing Market Area to produce 'outcome priorities' for each one. The four stage DaSTs approach will form the basis of the new LTP submissions - which development work has already started on.
23. A principal question in this consultation is whether the proposed structure is sound and fit for purpose.
24. The transport chapter's DaSTs approach and the regional response has been agreed at the East Midlands DaSTs Directors Group and subsequently at EMRA board on stage 1 of the approach on DaSTs, including agreeing strategic regional priorities and work programmes. The County Council is therefore comfortable that the regional level outcomes provide a sound basis for the Review; the regional level challenges provide a sound basis for the identification of regional transport investment and thus the proposed structure is considered sound and fit for purpose.

Renewable and Low Carbon Energy Generation Background

25. At the start of the Option Consultation document (Paragraph 1.2) the Regional Assembly states that the Partial Review will focus on '....housing, transport and climate change' It is disappointing that apart from the background references in the general introductory statements, there is little reference elsewhere in the document to climate change, particularly adaptation. More explanation is needed, given the Government's growing recognition of the need to tackle climate change in an integrated way. The Options Consultation document gives the impression that the only means by which the region can help tackle levels of greenhouse gas emissions is through renewable or low carbon energy generation, appropriate transport infrastructure and urban concentration options. This excludes consideration of energy infrastructure issues, especially for moving toward more efficient decentralised energy supply systems, and of incorporating resilience into the planning and design of new buildings and structures given the inevitability of needing to adapt to a more hostile climate.
26. The Partial Review should consider the implications of more severe climatic conditions, not least because the regional planning section of the supplement to PPS1 on Planning and Climate Change advocates

vulnerability assessments, particularly to identify areas where suitable measures to provide resilience are not viable.

27. Similarly the Review should take the opportunity to query the complacency of an approach which assumes ongoing, plentiful supplies of oil and gas. There is a very real threat of 'Peak Oil' being reached within the timeframe of the Plan and each housing market area should have reflected this in at least one of its options. The preferred option, when produced should include provision for resilience to 'Peak Oil'.

Aggregates

28. In the absence of revised national guidance on regional apportionment figures for the period up to 2021, it is not considered appropriate to 'roll forward' the current regional apportionment from 2016 to 2021 to provide a basis for Local Development Framework preparation. The new figures for the East Midlands currently being assessed by the East Midlands Aggregate Working Party should be used as a starting point. To do otherwise risks Minerals Core Strategies becoming out of date before they are adopted.

Conclusion

29. This report and the comments set out in Appendix 2 will form the basis the County Council's response to the Partial Review – Options Consultations. The response will be submitted electronically via the consultation website.

Recommendation

30. It is recommended that the Report be approved and it, together with the comments set out in Appendix 2 should form the basis of the formal response of this Council to the East Midlands Regional Plan: Partial Review Options Consultation.

Statutory and Policy Implications

31. This report has been compiled after consideration of implications in respect of finance, equal opportunities, personnel, Crime and Disorder and those using the service. Where such implications are material, they have been described in the text of the report.

Human Rights Act Implications

32. The Human Rights Act implications arising from this report have been assessed in accordance with the Council's adopted protocol. At this strategic level, no human rights issues are raised. However, these are matters for consideration at local level when specific development proposals come forward.

COUNCILLOR MARTIN SUTHERS

DEPUTY LEADER

Legal Services Comments

The decision falls within the delegation to Cabinet. [HD - 26/8/09].

Comments of the Service Director - Finance

There are no direct financial implications arising from the contents of this report. (MA 25/08/09)

Background Papers Available for Inspection

East Midlands Regional Plan: Partial Review Options Consultation June 2009.

County Electoral Divisions Affected

All.

Appendix 1

The options for each of the Housing Market Areas (HMAs) covering Nottinghamshire are set out in below:

The Nottingham Core HMA options are described as:

- Option 1 - Continue with the current strategy of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston.
- Option 2 - Focus on regenerating the Principal Urban Area of Nottingham.
- Option 3 - Focus development at transport nodes with good accessibility to the Principal Urban Area of Nottingham.
- Option 4 - Concentrate the majority of new development into a large new settlement.

The Nottingham Outer HMA options are described as :-

- Option 1 - Continue with the current strategy of focussing development and regeneration in and adjoining the Sub-Regional Centres of Mansfield-Ashfield and Newark.
- Option 2 - Concentrate significantly higher levels of development, regeneration and growth in and adjoining the Sub Regional Centres of Mansfield- Ashfield and Newark.
- Option 3 - Focus the majority of development into the more urbanised western portion of the HMA and at the Newark Growth Point.
- Option 4 - Focus development at the HMA's rail and bus served public transport nodes of Mansfield – Ashfield and stops along the Robin Hood Line, and Newark and selected stops along the Lincoln to Nottingham line.

The Northern HMA options are described as:-

- Option 1 – Continue with the current strategy of focusing development and regeneration in and adjoining the Sub- regional Centres of Chesterfield and Worksop.
- Option 2 – Focus development, regeneration, investment and growth more evenly across the Sub – Regional Centres of Chesterfield and Worksop and the other urban areas of Clay Cross, Dronfield, Staveley, Bolsover, Shirebrook and Retford and potentially at Haworth related to the Robin Hood Airport.
- Option 3 - Focus development at the HMA's rail served public transport nodes of Chesterfield, Worksop, Retford and Dronfield.
- Option 4 – Focus on improving the wider public transport networks to facilitate access to the major centres of employment within and outside the HMA including Nottingham, Derby, Mansfield, Chesterfield , Worksop and Sheffield and other South Yorkshire towns.

Appendix 2

In this consultation EMRA are seeking responses to specific questions, the questions relevant to Nottinghamshire County Council are set out below:

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 needs to be questioned, particularly the possible option to use 2006-based household projections which could require the region to provide 28,000 homes per year (700,000 homes between 2006-31 in total)

There are two principal reasons to suggest conservative approach to overall housing growth; that house building, in the medium term will not achieve such high levels as in the recent past, and this needs to be accounted for, and secondly, there will be longer-term effects deflating in-migration and also impacting on future projections.

Taking the latter point first, and most significantly for the Partial Review, the National Housing and Planning Advice Unit has, since the publication of the RSS Partial Review Options Consultation, produced "More homes for more people: Advice to Ministers on housing levels to be considered in regional plans". In this it recognises some of the issues mentioned above and propose "new numbers set half-way between our old figures and the numbers suggested by the latest evidence [i.e. the latest household projections]".

"NHPAU has assumed that net migration will follow the 2006-based low migration variant to 2014 before gradually returning to the long-run trend over the following five years. The net effect of this assumption is to place the NHPAU projection between the 2006-based principal and low migration household projections (figure 1)."

Consequently the range of 25,100 to 26,800 dwellings a year for the Region, while around 8% higher than the previous range, is not as high as the 28,000 figure anticipated in the Options Consultation.

On the matter of house building trends, the current economic downturn is now predicted to be both deeper and longer lasting than envisaged when the EMRP Partial Review was launched. This has had an impact on housing demand and will continue to do so in the short and medium terms. The reluctance of banks and financial institutions to offer mortgages and the continuing fall in house prices will further depress the demand for new homes, leading to developers mothballing plans. There is considerable local evidence for this – a large fall in planning application numbers and government's own tacit acknowledgement of this by the need to introduce the Homes and Communities Agency Kick Start programme.

By delaying the Partial Review the full implications of the economic downturn, the emerging priorities of the new Homes and Communities Agency and the views of the emerging/shadow Leaders' Board would be able to be taken into account.

The new economic circumstances will also alter migration patterns significantly. Recent population projections and household forecasts, which are based upon migration in the previous five years, will have been heavily influenced by the substantial levels of in migration to the UK and East Midlands, especially from EU Accession countries during the early years of this century. Local evidence again suggests that this trend has now slowed down. The Office for National Statistics

(ONS) estimate of the actual population in 2007 is 1,300 lower than the figure projected for the same year in the ONS 2006-based population projections. For example, the net international migration to the City estimated by ONS for 2006-2007 (3,300) is 600 lower than the annual average for 2001-2006.. There is a very real danger that growth predictions based on information taken on the crest of an immigration wave are no longer fit for purpose and that future forecasts will paint a very different picture.

In November 2008 the Environmental Audit Committee concluded that the Government should rethink its target to build 3million homes by 2020 to reflect the impact of the economic downturn. Pressure to provide land for so many homes could lead to Greenfield sites being developed in advance of and at the expense of brownfield or regeneration projects, contrary to the intentions of government planning policy.

Section 4(4) authorities across the region will be investigating population and household projections to ensure that the requirements of the next Regional Plan take proper account of the most reliable information. The House of Commons Communities and Local Government Select Committee is holding an Inquiry into "Housing and the Credit Crunch" and its findings in respect of government targets for both market and social housing will provide crucial intelligence on this aspect. The Select Committee is expected to report late this year.

The economic slowdown means that there will be sufficient housing land available to meet the levels of house building that can reasonably be expected to come forward in the short to medium term. Implementation of the version of the Regional Plan which was published in March will make available very substantial numbers of new housing plots, including large sustainable urban extensions (SUEs). Carrying out a Partial Review at this time, using projections and forecasts based on out of date assumptions will, in all probability, lead to a significant oversupply of housing land, undermining the urban regeneration and urban concentration ambitions of the current Regional Plan and causing unnecessary and unhelpful release of Greenfield land for housing development.

There is therefore a compelling case for delaying the housing aspects of the Partial Review, taking stock of the requirement for new housing and waiting for information about future population and household growth which takes account of new economic realities. This will also allow the proper consideration of all of the other Partial Review subjects which will be essential if further housing growth is to take place without breaching other related environmental standards. It will also allow for the consideration of a wider range of matters including the very important related subject of economic and employment growth.

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

RSLs are having difficulties in providing shared ownership properties, as these are not selling and consequently not providing an income stream for future development. The potential for alternative and innovative new schemes needs consideration/development. This may apply to the development process as well as the final product.

This is primarily a consequence of greater restrictions being placed on mortgage lending agreements, particularly for those that would be viewed as higher risk clients, or for less well established models of home ownership such as shared ownership or shared equity.

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

Authorities in the Nottingham Core Strategic Housing Market Area carried out a study on viability issues, this raises issues of viability in a number of areas and potential development sites. This highlights the need for development funding and current models of development to be reviewed.

4) 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 should be used, as the current indicative targets will be retained, although it is acknowledged that these are unlikely to be achieved within the current state of the market. Following this it is logical that revised targets are supported by local research within housing market areas in terms of the needs identified through these studies, and the viability of achieving such targets.

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

The key to maximising affordable housing delivery would be to ensure that land values and infrastructure costs do not make the development unviable under existing grant rates. Consideration may need to be given to setting land values at a proportion of anticipated sales value as per European models with land values set at around 20 -30% of anticipated sales values. (Ref The Housing Forum Working with NHBC).

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

Not on a specific area basis, as this will be considered in terms of housing need in Strategic Housing Market Assessments (SHMAs), but in terms of the potential approaches and looking at a robust assessment level this could be of help. The following could be useful:

- Modernising services for older people in Nottinghamshire Consultation Report 2008
- The implications for policy of the “Older People’s Housing Needs Study” (April 2009) undertaken by Peter Fletcher Associates for EMRA.
- Advice and information on the various types of accommodation to be provided for older people and the need to accommodate some of the elderly population within general needs housing.
- Advice on the location of new build provision – what makes a good location – links to services, retail and transport etc.
- Links to “Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society” (February 2008), which refers, amongst other things, to:
 - the need for SHMAs to identify future older persons households as key element in development
 - CLG projections of older households at district and regional level being available to aid planning
 - ensuring that planners have the tools and understand the need for Regional Spatial Strategies and Local Development Frameworks to assess and plan for an ageing society

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

The current strategic approach is based on urban concentration and regeneration with sustainable urban extensions focused on the Principal Urban Areas, Growth Towns and some Sub-Regional Centres. Given that 2021 is less than 10 years after the proposed adoption of the aligned Core Strategies, a radical change of strategy is not appropriate or justified. However, it may be necessary for some HMAs to deviate slightly from this from 2021 depending on the scale of growth envisaged

The Spatial Development Options put forward are not based on a scale of growth envisaged for the region or the capacity of the region. Indeed, it may be better to work out the preferred Spatial Development Option/s for the region/HMAs and then base the scale of growth on what the region/HMA can best benefit from.

It is likely that preferred option/s will be hybrids of the options put forward, and that different HMAs will have different preferred Spatial Development Options.

8) 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 Question 7

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

- Nottingham Core Housing Market Area

The current HMA approach is of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston. Given that 2021 is less than 10 years after the proposed adoption of the aligned Core Strategy, a radical change of strategy is not appropriate or justified.

The Spatial Development Options put forward are not based on a scale of growth envisaged for the HMA or the capacity of the HMA. Indeed, it may be better to work out the preferred Spatial Development Option for the HMA and then base the scale of growth on what the HMA can best benefit from.

A growth level similar to the adopted EMRP may be able to be achieved through a hybrid option of options 1 with 3 ie mainly urban concentration/regeneration, but also more closely reflecting the findings of the Sustainable Urban Extensions study, increasing the role of the two Sub-Regional Centres of Hucknall and Ilkeston and other important transport nodes. A level of growth which is too high could result in unwanted town cramming or in a too dispersed pattern of growth which is unsustainable or could require a new settlement.

The HMA transport/capacity implications for options will be assessed using the Nottingham HMA Transport Model which will provide support for the Preferred Option consultation in January 2010.

- Nottingham Outer Housing Market Area

Option 3; developing an emphasis on growth in the Western side of the HMA, plus the Newark growth point has merit, but this should not overlook the potential for regeneration and growth in some villages in Newark and Sherwood, especially Ollerton-Boughton. The potential of the rail links in the HMA should also be utilised.

- Northern Housing Market Area.

Sustaining regeneration for the area is a prime objective that should be delivered best by enhancing the roles of smaller settlements, aligning with options 2 & 4, recognising the various roles of settlements in supporting employment locally, or sustainable commuting to larger centres, some of which may be outside the HMA (such as Mansfield, Nottingham or Sheffield). This approach could also accommodate higher growth, but only as long as the economy could sustain it, assisting in reducing out-commuting.

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

The adopted East Midlands Regional Plan has no phasing or sequential approach to residential development which could have implications for regeneration and sustainable development.

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

- a) In the Effective and Efficient Travel outcome "shorter" could be added to quicker for access to employment assuming intense brownfield site/mixed use development.
- b) Impacts could include Wider Economic Benefits (economic development/growth).
- c) Potential inverse relationship between congestion and road safety - i.e. reducing congestion will improve traffic speeds which could increase accident numbers/severity

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

The transport chapter's DaSTs approach and the regional response has been agreed at director level across the Region on the work completed to date. The County Council is therefore comfortable that the regional level outcomes provide a sound basis for the Review; the regional level challenges provide a sound basis for the identification of regional transport investment and thus the proposed structure is sound and fit for purpose

13) Is the proposed structure for the revised Regional Transport Strategy sound and fit for purpose?

The Proposed RTS structure fits well with national and local issues and objectives (DaSTS/HMA).

Although the Partial Review also addresses transport issues it does not look directly at economic issues, though will fully consider the economic implications of other changes. However it may be possible for Policy 21 of the adopted East Midlands Regional Plan on Strategic Rail Freight Distribution to be reconsidered through the Partial Review and or the Department for Transport's Delivering a Sustainable Transport System (DaSTS) process. It is considered that the locational guidance in Policy 21 will not necessarily lead to the best sites coming forward, and that:

It does not provide guidance on the area of search for an alternative site assessment – should it be at HMA, sub-regional or regional level?

A Housing Market Area is not a logical planning unit on which to base locational guidance for strategic distribution centres as they have regional and national significance. It is important to consider the level of supply and demand, the need for a strategic distribution centre in each of the HMAs listed in Policy 21 is questioned. As part of the Partial Review and Single Regional Strategy preparations, EMRA and emda are requested to consider undertaking a comparative study of all possible rail freight sites in the Sub-Region/Region.

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

There is no one appropriate mix across the region.

The types of generation will vary greatly between different areas. Urban areas should be looking at Combined Heat and Power (CHP), Heat networks, Photo-voltaics while rural areas could make better use of large and small scale wind, biomass and hydro power.

Other technologies (such as anaerobic digesters) may become significant in some areas and further technologies will develop. Energy from waste has a potential to provide an intermediate level of low carbon in CHP while reducing its carbon levels through improved technologies.

However, further comment on this question is required:

- At the start of the Option Consultation document (Paragraph 1.2) the Regional Assembly states that the Partial Review will focus on ‘...housing, transport and climate change’ It is disappointing that apart from the background references in the general introductory statements, there is little reference elsewhere in the document to climate change, particularly adaptation. More explanation is needed, given the Government’s growing recognition of the need to tackle climate change in an integrated way. The Options Consultation document gives the impression that the only means by which the region can help tackle levels of greenhouse gas emissions is through renewable or low carbon energy generation, appropriate transport infrastructure and urban concentration options. This excludes consideration of energy infrastructure issues, especially for moving toward more efficient decentralised energy supply systems, and of incorporating resilience into the planning and design of new buildings and structures given the inevitability of needing to adapt to a more hostile climate.
- The Partial Review should consider the implications of more severe climatic conditions, not least because the regional planning section of the supplement to PPS1 on Planning and Climate Change advocates vulnerability assessments, particularly to identify areas where suitable measures to provide resilience are not viable.
- Similarly the Review should take the opportunity to query the complacency of an approach which assumes ongoing, plentiful supplies of oil and gas. There is a very real threat of ‘Peak Oil’ being reached within the timeframe of the Plan and each housing market area should have reflected this in at least one of its options. The preferred option, when produced should include provision for resilience to ‘Peak Oil’.

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

The Nottingham Core HMA should capitalise on its dense urban nature to make use of Heat Networks and on-site renewables. Strategies to retro-fit energy efficiencies to the predominance of older housing should be developed as well as improving take up of photovoltaics on urban roofs. The development of large scale Sustainable Urban Extensions should facilitate the use of localised energy generation within those development areas, which can use adjoining existing built up areas to provide critical mass for larger scale generation. Similarly the scale of SUEs should provide the economies of scale to facilitate building to a higher standard of energy efficiency through design and construction techniques.

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

Through CHP Heat Networks and on-site central CHP. Localised generation through a combination of grid and private wire systems can deliver locally within urban areas, reducing the wastage of transmitting long distance. More attention should be devoted to decentralised energy distribution as part of the strategic planning of low carbon communities.

17) In the absence of revised national guidance on regional apportionment figures for the period up to 2021, should minerals planning authorities 'roll forward' the current regional apportionment from 2016 to 2021 to provide a basis for Local Development Framework preparation, as has already happened in some areas? If not, what other methodology should be used and why?

Any apportionment should be based on the new figures for the East Midlands currently being assessed by the East Midlands Aggregates Working Party. To do otherwise risks Minerals Core Strategies becoming out of date before they are adopted.

18) In any future sub- regional apportionment based on revised national figures up to 2021, should the Region continue to plan for a progressive reduction in aggregates and other land won minerals from the Peak District National Park and the Lincolnshire Wolds AONB as set out in Policy 37 of the Regional Plan?

This is national policy and the Partial Review should reflect this. The potential impact on Nottinghamshire of such a reduction is unlikely to be significant so this Authority has no specific concerns about this issue.

19) In any future sub- regional apportionment based on revised national figures up to 2021, should levels of past production continue to be the primary basis for determining provision outside the Peak District National Park and the Lincolnshire Wolds AONB, If not what other methodology should be used and why?

This is a reasonable and simple approach to adopt in principle. However, where significant shifts in local share of production have occurred, (as they have in Nottinghamshire) the reasons behind these changes should be assessed. For example, an apparent downturn could be caused by restrictive planning policies or other factors reducing output rather than this reflecting a relative reduction in demand from the traditional market areas. Conversely higher figures could be distorted by major local construction projects. If such factors are not understood and taken into account then this could provide local apportionment figures that are not appropriate.

Appendix 3. Nottingham City Council's proposed DRAFT officer response to the Partial Review

1 Inappropriateness of Timing of Review

Notwithstanding the response to the questions posed by EMRA, in line with the City Council comments previously made to them on the Project Plan, **it is considered inappropriate to review the EMRP now**, and the Partial Review should be deferred (as is the case in the Yorkshire & the Humber regional review) for the following reasons:

- A) The timing conflicts with the work on the Core Strategy work currently being undertaken, and could undermine it:
- ▶ Councils are currently focussed on testing the implications of the adopted EMRP, and there needs to be a period to allow Core Strategy development as a priority before introducing further uncertainty.
 - ▶ In order to deliver a comprehensive Spatial Planning Framework at the local level, staff resources would be better spent preparing Core Strategies, rather than delay Core Strategies until the EMRP Partial Review is progressed. Any delay would also make the ever increasing Core Strategy evidence base (eg housing, retail and employment land studies) more out of date.
 - ▶ The Partial Review concentrates post 2021 – this will have implications for the aligned Core Strategy (which has an end date of 2026). This is extremely unhelpful, as the Partial Review will be emerging during the course of Core Strategy preparation, e.g. the Aligned Core Strategy for Greater Nottingham will have reached Examination in Public stage at the same time as the Partial Review moves into consultation on the Secretary of State's proposed changes ie the final stage before publication. Local Planning Authorities risk devoting considerable resources and energy to bringing forward abortive Core Strategies.
- B) Also please see response to the 16 relevant questions posed, particularly the response to Question 1 re Housing Provision.
- C) The timing is also **premature in advance** of the Government's new 'Delivering a Sustainable Transport System' approach which seeks to provide a new national, regional and sub regional Transport planning framework.
- D) The timing of the Review appears to place too much emphasis on fitting in with the passing of Regional Planning responsibility to emda and results in insufficient time to get a credible evidence base. As it is looking post 2021 there is plenty of time for the matters to be picked up a single Regional Strategy prepared following the implementation of the Sub National Review proposals.

If a Partial Review is undertaken, the scope needs to be set as tightly as possible, whilst focussing on issues which could usefully be applied to inform emerging Core Strategy issues as a priority, such as Climate change, the sequential approach, employment land provision and guidance on the provision of family housing.

As part of the consultation EMRA are seeking responses to specific questions, the relevant ones are:

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?

Forecasting/Impact of downturn

The method of forecasting housing provision figures needs **to be fundamentally questioned**, particularly the possible option to use 2006-based household projections which could require the region to provide 28,000 homes per year (a massive 700,000 between 2006-31 in total).

The current economic downturn is now predicted to be both deeper and longer lasting than envisaged when the EMRP Partial Review was launched.

This is impacting housing demand and will continue to do so in the short and medium terms. The reluctance of banks and financial institutions to offer mortgages and the continuing fall in house prices will further depress the demand for new homes, leading to developers mothballing plans. There is considerable local evidence for this – a large fall in completions, planning application numbers and government's own tacit acknowledgement of this by the need to introduce the HCA's Kick Start programme. By delaying the Partial Review the full implications of the economic downturn, the emerging priorities of the new Homes and Communities Agency and the views of the emerging/shadow Leaders' Board would be able to be taken into account in this important Plan making process.

The City Council considers the increasing the pace of delivery to make up for this shortfall will prove to be extremely challenging if not impossible over the plan period. The **existing EMRP housing figures are therefore in danger of being undeliverable in the short to medium term, and any further significant increase will further stretch the credibility of the regional planning process.**

Capacity in Nottingham City

At a City level, this is compounded by the fact that the existing Regional Plan housing target for Nottingham is already considered to be unlikely to be delivered, due to the recent substantial decline in completion rates. This is

particularly challenging when viewed alongside Nottingham's Sustainable Community Strategy priority of seeking to prioritise family housing provision, as opposed to the high density 1 and 2 bedroom flat provision which contributed the bulk of the recent peak in delivery of around 1,000 units per year. Account also needs to be taken of the impact of any likely move away by developers from brownfield and City Centre residential development to greenfield Sustainable Urban Extensions which is likely to result from the current target requirements.

This year Communities and Local Government are to revise the definition of dwellings which can be counted against the Regional Plan targets to include purpose-built student flats. The City Council welcomes this change, as such properties are playing an important role within the local housing market. However, the effect of their inclusion on meeting any housing target is likely to be limited and will depend upon the extent to which suitable sites can continue to be identified for them.

Migration patterns

The new economic circumstances will also alter migration patterns significantly. Recent population projections and household forecasts, which are based upon migration in the previous five years, will have been heavily influenced by the substantial levels of in migration to the UK and East Midlands, especially from EU Accession countries during the early years of this century. Local evidence again suggests that this trend has now slowed down. For instance, the Office for National Statistics (ONS) estimate of the actual population in 2007 is 1,300 lower than the figure projected for the same year in the ONS 2006-based population projections. Also the net international migration to the City estimated by ONS for 2006-2007 (3,300) is 600 lower than the annual average for 2001-2006. There is a very real danger that growth predictions based on information taken on the crest of an immigration wave are no longer fit for purpose and that future forecasts will paint a very different picture.

Section 4(4) authorities across the region will be investigating population and household projections to ensure that the requirements of the next Regional Plan take proper account of the most reliable information. The House of Commons Communities and Local Government Select Committee is holding an Inquiry into "Housing and the Credit Crunch" and its findings in respect of government targets for both market and social housing will provide crucial intelligence on this aspect. The Select Committee is expected to report late this year.

Impact on Regeneration

In the context of such conditions, public sector funding for infrastructure delivery will be very constrained. The ability of residential development to generate developer contributions to support such infrastructure delivery will be very

important. The dispersal effect of urban extensions may lead to a **disproportionately negative effect** on the provision of regenerative infrastructure funding. This effect would be compounded if further very high levels of green field development is required.

In November 2008 the Environmental Audit Committee concluded that the Government should rethink its target to build 3 million homes by 2020 to reflect the impact of the economic downturn. Pressure to provide land for so many homes could lead to Greenfield sites being developed in advance of and at the expense of brownfield or regeneration projects, contrary to the intentions of government planning and environmental policy.

Outlook

NLP has recently released its Economic Outlook report for August 2009. Drawing on the latest economic data, including GDP, labour market, house price and retail sales statistics, it paints a picture of a downturn that is slowing but not yet reversing, representing the longest and deepest recession in the UK since the 1930s. Looking forward, the outlook points to a long and slow recovery before the value of the economy and levels of employment return to pre-recession levels. It is increasingly clear that although the economy appears to be bottoming out, there will be no short sharp return to business as usual. Investment decisions and policy choices will need to respond to what is likely to be a 3-5 year time horizon for recovery. But there are clear opportunities, with some sectors outperforming the wider economy. The report also identifies some of the potential implications of current trends, and highlights some key considerations for investors, developers, and policy makers in shaping their response to them.

The uncertainties created by the current economic climate and housing market conditions in themselves raise very significant reservations on the part of the City Council as to whether it is prudent to carry out a partial review of the housing aspects of the Regional Plan at this time at all. The economic slowdown means that there will be sufficient housing land available to meet the levels of house building that can reasonably be expected to come forward in the short to medium term. Implementation of the version of the Regional Plan which was published in March will make available very substantial numbers of new housing plots, including large sustainable urban extensions (SUEs). Carrying out a partial review at this time, using projections and forecasts based on out of date assumptions will, in all probability, lead to a significant oversupply of housing land, undermining the urban regeneration and urban concentration ambitions of the current Regional Plan and causing unnecessary and unhelpful release of Greenfield land for housing development.

There is therefore a compelling case for delaying the housing aspects of the partial review, taking stock of the requirement for new housing and waiting for information about future population and household growth which takes

account of new economic realities. This will also allow the proper consideration of all of the other partial review subjects which will be essential if further housing growth is to take place without breaching other related environmental standards. It will also allow for the consideration of a wider range of matters including the very important related subject of economic and employment growth.

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

There are current issues to do with affordability regarding RSL's and difficulties in providing shared ownership properties, as these are not selling and consequently providing an income stream for future development. The potential for alternative and innovative new schemes need consideration/development. This may apply to the development process as well as the final product, which is currently impacting on affordability.

This is primarily a consequence of greater restrictions being placed on mortgage lending agreements, particularly those that would be viewed as higher risk clients, or for properties of less well established models into home ownership such as shared ownership or shared equity.

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

Nottingham Core Strategic Housing Market recently had a study on viability issues for the area completed, which raises issues of viability in a number of areas and potential development sites. This draws attention to the fact that due to the completed sale value of any housing developed on these sites, with land value and development costs incurred as part of the construction the sites have a negative value and potentially under existing funding mechanisms will not be developed – even as affordable housing. This highlights the for development funding and current models of development to be reviewed. This is discussed and considered in a report produced by the Housing Forum working with NHBC – “Land for Homes – Creating Value through Community Leadership and Co-Investment – Working Group”. The findings in this report should be seriously considered with new models of development approach being introduced and adopted.

See also the response to Question 1 - Housing Provision

4) 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, should be used, as the current indicative targets will be retained, although it is acknowledged that these are unlikely to be achieved within the current state of the market. Following this it is logical that revised targets are supported by local research within housing market areas in terms of the needs identified through these studies, and the viability of achieving such targets.

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

The key to maximising affordable housing delivery would be to ensure that land values and infrastructure costs do not make the development unviable under existing grant rates. Consideration may need to be given to setting land values at a proportion of anticipated sales value as per European models with land values set at around 20 -30% of anticipated sales values. (Ref The Housing Forum Working with NHBC).

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

Not on a specific area basis, as this will be considered in terms of housing need in Strategic Housing Market Assessments (SHMAs), but in terms of the potential approaches and looking at a robust assessment level this could be of help. The following could be useful:

- The implications for policy of the “Older People’s Housing Needs Study” (April 2009) undertaken by Peter Fletcher Associates for EMRA.
- Advice and information on the various types of accommodation to be provided for older people and the need to accommodate some of the elderly population within general needs housing.
- Advice on the location of new build provision – what makes a good location – links to services, retail and transport etc.
- Links to “Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society” (February 2008), which refers, amongst other things, to:
 - the need for SHMAs to identify future older persons households as key element in development
 - CLG projections of older households at district and regional level being available to aid planning
 - ensuring that planners have the tools and understand the need for Regional Spatial Strategies and Local Development Frameworks to assess and plan for an ageing society

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

The current strategic approach is based on urban concentration and regeneration with sustainable urban extensions focused on the Principal Urban Areas, Growth Towns and some Sub-Regional Centres. Given that 2021 is less than 10 years after the proposed adoption of the aligned Core Strategies, a radical change of strategy is not appropriate or justified.

However, it may be necessary for some HMAs to deviate slightly from this from 2021 depending on the scale of growth envisaged

The Spatial Development Options put forward are not based on a scale of growth envisaged for the region or the capacity of the region. Indeed, it may be better to work out the preferred Spatial Development Option/s for the region/HMAs and then base the scale of growth on what the region/HMA can best benefit from.

It is likely that preferred option/s will be hybrids of the options put forward, and that different HMAs will have different preferred Spatial Development Options.

8) 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 Question 7

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

The current HMA approach is of focusing development and regeneration in the Principal Urban Area of Nottingham and the Sub Regional Centres of Hucknall and Ilkeston. Given that 2021 is less than 10 years after the proposed adoption of the aligned Core Strategy, a radical change of strategy is not appropriate or justified.

The Spatial Development Options put forward are not based on a scale of growth envisaged for the HMA or the capacity of the HMA. Indeed, it may be better to work out the preferred Spatial Development Option for the HMA and then base the scale of growth on what the HMA can best benefit from.

Previous comments of the City Council regarding the degree of flexibility between development located in/on the edge of the Principal Urban Area remain relevant. A growth level similar to the adopted EMRP may be able to be achieved through a hybrid option of options 1 with 3 ie mainly urban concentration/regeneration, but also more closely reflecting the findings of the Sustainable Urban Extensions study, increasing the role of the 2 Sub-Regional Centres of Hucknall and Ilkeston and other important transport nodes. A level of growth which is too high could result in unwanted town cramming or in a too dispersed pattern of growth and the unwanted possibility of a large new settlement.

- The HMA transport/capacity implications for options will be assessed using the Nottingham HMA Transport Model which will provide support for the Preferred Option consultation in January 2010
- As far as housing growth in the City is concerned it is unlikely that the 20,000 dwellings required in the adopted EMRP (2006-26) will be achieved, so a figure of 17,000-20,000 for the period 2006-31 may be more realistic, given the current economic climate and the move away by developers from brownfield and City Centre residential development to greenfield Sustainable Urban Extensions.
- The adopted EMRP has no phasing or sequential approach to residential development, and this could harm the regeneration ambitions of the City. However, the development of too many houses within the urban area could lead to town cramming and the loss of open spaces, employment land and other facilities.

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

See response to Question 9

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

- a) In the Effective and Efficient Travel outcome "shorter" could be added to quicker for access to employment assuming intense brownfield site/mixed use development. More emphasis on reducing the need to travel is required to meet the Government's challenging Carbon transition agenda.
- b) Impacts could include Wider Economic Benefits (economic development/growth).
- c) Potential inverse relationship between congestion and road safety - i.e. reducing congestion will improve traffic speeds which could increase accident numbers/severity
- d) the full benefits of securing the development of integrated urban transport systems delivering infrastructure within the urban areas is not fully reflected

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

The challenges are considered to be very challenging and cover all bases.

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

The Proposed RTS structure fits well with national and local issues and objectives (DaSTS/HMA).

Although the partial review also addresses transport issues it does not look directly at economic issues, though will fully consider the economic implications of other changes. However it may be possible for Policy 21 of the adopted EMRP on Strategic Rail Freight Distribution to be reconsidered through the Partial Review and or the Department for Transport's Delivering a Sustainable Transport System (DaSTS) process. It is considered that the locational guidance in Policy 21 will not necessarily lead to the best sites coming forward, and that:

It does not provide guidance on the area of search for an alternative site assessment – should it be at HMA, sub-regional or regional level?

- A Housing Market Area is not a logical planning unit on which to base locational guidance for strategic distribution centres as they have regional and national significance.
- It is more important to consider the level of supply and demand ie do you need one in each of the 5 HMAs?
- It is not clear how much weight should be given to each criterion.
- It is not specific enough as a development control tool.

And further, that as part of the Partial Review and Single Regional Strategy preparations, EMRA and emda are requested to consider undertaking a comparative study of all possible rail freight sites in the Sub-Region/Region.

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

There is no one appropriate mix across the region.

The types of generation will vary greatly between different areas. Urban areas should be looking at CHP, Heat networks, Photo-voltaics while rural areas can make better use of large and small scale wind, biomass and hydro.

Other technologies (such as anaerobic digester) may become significant in some areas and further technologies will develop. Energy from waste has a potential to provide an intermediate level of low carbon in CHP while reducing its carbon levels through improved technologies.

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

As shown on the chart, the Nottingham Core HMA should capitalise on its dense urban nature to make use of Heat Networks and on-site renewables. Strategies to retro-fit energy efficiencies to the predominance of older housing should be developed as well as improving take up of photovoltaics on urban roofs. The development of large scale Sustainable Urban Extensions should facilitate the

use of localised energy generation within those development areas, which can use adjoining existing built up areas to provide critical mass for larger scale generation. Similarly the scale of SUEs should provide the economies of scale to facilitate building to a higher standard of energy efficiency through design and construction techniques.

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

Through CHP Heat Networks and on-site central CHP. Localised generation through a combination of grid and private wire systems can deliver locally within urban areas, reducing the wastage of transmitting long distance.