

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

Date **24th October 2008** agenda item number

From **JOINT OFFICER STEERING GROUP**

Report

STRATEGIC PLANNING UPDATE

Purpose of Report

- 1 To update the Committee on a number of Strategic Planning issues.

Background

Regional Spatial Strategy

- 2 Members have previously considered a number of reports on the preparation of the Regional Spatial Strategy. Following the Examination in Public held in the summer 2007, the Independent Panel produced a report with their recommendations in November 2007. The Secretary of State has responded to the Panel's advice and has proposed a number of changes based primarily, but not exclusively, on their recommendations. These changes were published for July 2007, with a closing date for comments on the 17th October. Appendix A sets out the main changes to the Draft RSS.
- 3 The timetable for responding to the proposed changes does not allow for discussion of any response by the Joint Committee. Nottinghamshire County Council and Nottingham City Council have both considered the Proposed Changes at their appropriate Executive Bodies. Appendices B and C contain their comments.
- 4 The proposed changes to the RSS were also considered by the Joint Planning Advisory Board at their meeting in September. Of most concern to JPAB members were the revised housing figures. The Proposed Changes figures correspond to those recommended in the Panel Report, but are now based on the more up to date 2004 Household Projections used by the Panel. The increases are largely down to more net migration into the HMA. In deriving local authority figures the Proposed Changes simply apply the 19% increase for the HMA to each local authority figure. No account is taken of capacity and no policy judgment has been made. Because the

2001-2008 part of the period has already passed, this equates to a 24% increase for the remaining period. The Proposed Changes give no flexibility within Districts to re-apportion housing from the Principal Urban Area (PUA) to the non PUA parts of Districts. The proportion of non PUA housing in all Districts is generally low, but the Proposed Changes apply the same 19% multiplier to both the PUA and the non PUA part of the housing allocations. In some areas of the HMA, the low level of non PUA housing actually undermines the regeneration aims of the RSS, whilst in others it will prevent sustainable development and delivery of much needed affordable housing in settlements.

- 5 In drafting the Proposed Changes, the Secretary of State clearly expects local authorities within Housing Market Areas to work closely together and jointly agree an approach to housing numbers. Policy 13 states that redistributions of housing figures across HMAs are acceptable if delivered via a sound joint Core Strategy, whilst Policy 17 states that in delivering policies to manage the release of land across HMAs, joint Development Plan Documents will be expected, and joint Core Strategies particularly encouraged.
- 6 The Joint Planning Advisory Board has also agreed a Nottingham Core HMA response to the proposed changes and these comments have been submitted to the Secretary of State. This joint response underlies and is entirely consistent with the responses from the County and City Councils.

Review of the Regional Spatial Strategy

- 7 Members were advised at their meeting in March 2008 that a review of the East Midlands Spatial Strategy may be necessary. The Secretary of State has decided that an immediate partial review of the RSS is necessary to respond to both changes in national policy as well some recommendations made by the Panel. Accordingly, the East Midlands Regional Assembly have prepared a Project Plan for consultation. This sets out how it is intended to approach the partial review. The Project Plan includes the following timetable:-
 - 17th October 2008 – Launch of Project Plan for 8 weeks public consultation
 - 2nd April 2009 – Options Paper published for 8 weeks public consultation
 - 26th March 2010 – Draft Regional Plan (ie RSS) submitted to the Secretary of State for 12 weeks public consultation.
 - September 2010 – likely date for Examination in Public
 - March 2011 – Secretary of State's Proposed Changes published for consultation
 - September 2011 – Likely adoption date of the revised Regional Plan

- 8 The review would cover the period 2006 – 2031 and would principally consider increased housing levels (as contained in the most recent projections), a revision to the Regional Transport Strategy and a review of renewable energy targets. Also included would be revised provision for affordable housing, a re-assessment of sustainable locations in the Nottingham Core Housing Market Area and Hucknall and consideration of any new Growth Point or Eco-Town proposals. The Review will be launched on the 17th October, where the Project Plan will be published for an 8 week consultation period. A verbal update will be given at Joint Committee.

Joint Structure Plan

- 9 At the meeting on the 18th July, Members discussed the need to 'save' policies in the Joint Structure Plan pending the adoption of the East Midlands Regional Spatial Strategy and considered a draft list of Policies to be saved. The list of policies was endorsed by the County Council and the City Council and was put to the Regional Assembly for consideration at the Regional Housing, Planning and Transport Board on the 17th September. The Regional Board endorsed the list of policies which have now been forwarded to the Secretary of State via the East Midlands Government Office. The final decisions as to which Structure Plan Policies are saved rests with the Secretary of State who has six months to decide which policies to save.

RECOMMENDATION

It is RECOMMENDED Members of the Committee note the contents of the report.

Background Papers

Appendix B and Appendix C containing the County Council and the City Council's comments on the Proposed Changes to the RSS are attached to Council Members Papers only. If members of the public wish to inspect these schedules, they are available from the contact officers listed below. **Appendix 1. Nottingham City Council's response to the RSS Proposed Changes (in plan order)**

CORE STRATEGY

a) Core Strategy

The Strategy still does not incorporate sufficient detail to help in preparing Local Development Documents, especially with regard to the provision of family housing in developments, the suitability of house types for their purpose (eg having adequate room sizes), and providing appropriate levels of supporting community infrastructure.

b) Para 1.2.3 – Climate change

The more comprehensive approach to Climate Change in para 1.2.3 is supported, however, a specific robust climate change policy should be added to the RSS to ensure that this issue gets the necessary priority.

c) Para 1.4.2 – Renewable Energy

The reference to 10% of energy being from renewable resources is noted, however, this would be better as a policy rather than supporting text, and consideration should be given to increasing the percentage, and it being a minimum.

d) New Policy 2 – Promoting Better design

The deletion of Policy 3 is inadequately covered by new Policy 2. Previously Policy 3 referred to BREEAM 'very good' and 'lifetime homes' standards, - objection is raised to the deletion of these references. Policy 3 also stated that all urban extensions should be 'carbon neutral', and this reference has now been deleted.

e) Former Policy 2 – Sequential approach

This Policy prioritised development in urban areas and set out a sequential approach to selecting land for development. The deletion of this policy is objected to, because these aspects are inadequately covered elsewhere in the plan.

TOPIC BASED PRIORITY and SUB-REGIONAL STRATEGIES

f) Paras 3.1.5 and 4.2.9 – Hucknall and Ilkeston

Para 3.1.5 refers to 'strengthening' the Sub-regional roles of Hucknall and Ilkeston, whilst para 4.2.9 talks about 'maintaining' their role. Clarification is needed. (given the low level of housing allocated to Hucknall, it is assumed para 4.2.9 is correct.)

g) Policy 13 and Three Cities SRS 3 – Housing Numbers (3 Cities Sub-Area map is Appendix 5)

(i) It is a matter of significant concern that the proposed dwelling provision for the Nottingham Housing Market Area (HMA) is too high:

It is considered that the use of the 2004 Household Projections to derive housing provision results in an unrealistically high figure for the HMA, and the approach is considered flawed because the revised Household Projections have been applied pro rata without any rethinking of the policy approach. The following reasons suggest that the increase should be less than that set out in the Proposed Changes:-

It assumes what has happened in the past will continue to happen, whether desirable or not. In the case of the Nottingham HMA, the period reflects a time of high international in-migration, and also already reflects existing policy. Projecting forward in these circumstances is likely to overstate housing need.

It is based on looking back over 5 year periods. Trends over shorter periods are highly volatile, and this is recognized in other areas of planning, such as retail, where trends are taken over a longer period of time. It is considered that using a 10 year trend would be more appropriate. Whilst still resulting in a higher housing provision figure for Nottingham HMA, this would moderate some of the short term effects.

Additionally, there is no recognition in the Proposed Changes of the increased level of infrastructure required to support the new levels of growth.

The approach of using trend based figures to derive housing numbers is one that has implications across the region, and beyond. If the current approach continues, and the 2006 based Household Projections are used to underpin the RSS Partial Review, it is likely that a further uplift of 20% over the Proposed Changes will have to be accommodated. A full debate on more appropriate approaches will be put forward through the Partial Review process.

The approach of the Proposed Changes in applying a 19% uplift to each local authority area without justification or explanation is also unsatisfactory. The Proposed Changes strongly encourage HMAs (through joint planning) to come up with their own locally agreed distributions, yet it provides no strategic guidance for local authorities to work with, leading to further uncertainty.

ii) It is a matter of significant concern that the proposed dwelling requirement for Nottingham City is too high, and it is considered that the City can achieve a maximum figure of 1,000 net dwellings per annum 2006-2026 in line with the Joint Position Statement put to the Examination in Public. This is inline with the emerging initial Strategic Housing Land Availability Assessment. This would leave about 17,600 dwellings to provide 2008-26. Further:

- ▶ The level of housing growth over the last 5 years has been the highest for 30 years and is unlikely to increase over the longer term
- ▶ There is limited capacity within the urban area and the requirement of 28,100 dwellings would lead to too greater loss of existing open spaces, employment land and other uses which currently make up the mix of the City
- ▶ The requirement of 28,100 dwellings is above that of agreed Local Area Agreement indicators
- ▶ It should be noted that there are currently over 6,000 vacant dwellings in Nottingham alone

h) Policy 13 – 5 year phasing of housing requirement

The approach of using five year bands to effectively phase the delivery of housing over the plan period within each local authority area is considered to be too restrictive and it is better just have plan period figures. If the approach is to be adopted, then the banding should apply at HMA level only conurbation wide. This would allow the aligned Core Strategies to phase the release of large sites, based on evidence in the SHLAA studies and the 'Appraisal of

Sustainable Urban Extensions' report published in June 2008, and to concentrate resources on delivery and infrastructure in selected areas, rather than spreading these across the whole HMA. It would also allow for deficits in one area to be made up in others.

i) Policy 13 and Three Cities SRS 3 - Principal Urban Area (PUA)/Non PUA Apportionment of housing provision (**PUA map is Appendix 6**).

The principle of urban concentration which drives the PUA/non PUA apportionment of housing provision is accepted and supported. However, the degree of urban concentration is much higher in the Nottingham HMA than anywhere else in the region, ie the proportion of new homes to be built in or on the edge of the PUA is much higher than any other PUA in the region (78% compared to the next highest, Northampton at 65%). This means that the proportion of housing to be provided outside the PUA is conversely much lower than elsewhere in the Region.

In some areas of the HMA, the low level of non PUA housing actually undermines the regeneration aims of the RSS eg regenerating Cotgrave, whilst in others it will prevent sustainable development and delivery of much needed affordable housing in settlements.

The 78% does not even relate to the situation in Greater Nottingham, where if the Hucknall proportion is included in the non PUA portion, the proportion is about 74%.

It is therefore essential that a greater degree of flexibility to vary the PUA/non PUA apportionment is included in the final RSS, while still continuing to fully reflect urban concentration principles. Extra flexibility will allow for other aims of the RSS, such as regeneration, to be met outside the PUA. Early results from the Greater Nottingham SHLAAs fully support this more flexible approach.

If final RSS includes an apportionment lower than the current 78%, any concerns over further weakening of the policy of concentration on the PUA can be met by allowing Core Strategies to redistribute from the non PUA element to the PUA element, but not vice versa.

It is recommended that the PUA apportionment be 73% for the HMA and 69% for the HMA including Hucknall. If the provision figure for Nottingham falls to 1,000 per year, and this shortfall is redistributed within the HMA, then the apportionment should be reduced further.

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j) Policy 13 & Policy 17 - Joint Working

The need to plan across HMAs is endorsed, indeed a HMA wide Joint Planning Advisory Board has been established in recognition of this fact. However, the approach adopted in this HMA of aligning Core Strategies is not adequately reflected in the Proposed Changes and is recommended that references to joint Core Strategies be changed to also include aligned Core Strategies.

k) Policy 20 - Employment Land Provision

It is a matter of concern that the consideration of employment land provision in the RSS continues to be inadequate. In particular, there is limited guidance on the scale of new employment land required, and no figures are given either on a Housing Market basis or on a District/Unitary basis.

More detailed guidance on this is required to provide a comprehensive view to be taken of the overall scale and distribution of development, currently the housing requirements of RSS have not taken account of employment land needs.

l) Policy 37 – Waste Management

The emphasis on centralised waste treatment facilities in the 3 Cities Sub-area is noted. However, this should not be at the expense of smaller scale facilities where these can be embedded in new development, avoid the need to transport waste over longer distances, or contribute to renewable energy targets in new development.

m) Policy 42 – Regional Transport Objectives

The emphasis on reducing the need to travel, and particularly behavioural change within the RSS is welcomed. The importance of designing measures in at an early stage of development needs to be emphasised.

n) Former Policy 43/ New Policy 44 – Traffic Growth Reduction

It is regrettable that the aim of reducing the rate of traffic growth to at least zero is to be deleted. In addition to reducing congestion in the PUAs it would be desirable for a target relating to outside the PUAs to also be developed.

o) Policy 46 (Parking Levies) and Policy 47 (Car Parking Standards)

The City values the flexibility of being able to work at a sub-regional level to tackle congestion, but considers appropriate transport policy context needs to be applied at the regional level to secure progress, and in particular welcomes

- i) the retention of Policy 46 which encourages all transport authorities to examine workplace parking levies.
- ii) the recognition of the importance of maximum parking standards

p) Policy 55 – Regional Priorities for Air Transport

The Plan encourages the improvement of public transport links to East Midlands Airport (EMA) and for the development of the Airport within its own boundaries for passenger and freight movements. Other (economic) development associated with EMA is to be located within or on the edge of surrounding urban areas.

These aspects are strongly supported. Also to be welcomed is the policy framework for development at or associated with EMA as this will assist in strengthening and widening the economic base.

q) Three Cities SRS 2 - Green Belt Areas

The pragmatic approach to the future of the Green Belt is welcomed and support given to the principle of retaining the Green Belt.

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Appendix A

Main changes to the RSS.

- **Joint Development plan documents are encouraged**, including joint Core Strategies.
- **Increased housing growth across the region** from 20,418 to 21,750 per year for the period 2006-26. Much of the additional growth is proposed in and around the main cities of Derby, Leicester and Nottingham, recognising growth related to Growth Point agreements.
- **Redistribution of district/Urban Area housing provision is provided for.** This is particularly relevant for the Nottingham part of the Three Cities. Housing Market Area (HMA) minima must be met and “sound joint Core Strategies” should be in place.
- **About 63,000 dwellings are to be built in the Nottingham Core HMA (Broxtowe, Gedling, Nottingham City, Rushcliffe, the Hucknall part of Ashfield and Erewash).** Housing figures are minima. The increase of 18% on the Draft Plan is in line with the Panel Report.
- **There is rejection of the Panel’s recommendation to delete Green Belt areas around Nottingham.** However a comprehensive review of the most sustainable locations for growth within the Nottingham Core HMA and Hucknall will be required urgently to consider how to accommodate future growth requirements over at least the next 25 years. This review will need to be done as part of the evidence base underpinning the next RSS review.
- Three schemes have been deleted from the **Transport Investment Priorities** appendix as they have not reached a point where they can be regarded as fully committed (still in preparation or funding not secured): (1) development of major inter-modal freight terminal for 3 Cities and Nottingham East Midlands Airport; (2) Robin Hood line extension to Bingham; and (3) fixed public transport to Nottingham East Midlands Airport.
- **Eco-Towns are not proposed within this RSS and are a matter for the Review of the RSS.** However, supporting text in the 3 Cities section indicates that local development documents should consider an Eco-town within the HMA.
- **The changes retain reference to Cotgrave and Stanton ironworks** where Local Development Documents should also examine the case for supporting regeneration
- Removal of site specific references to major development sites around Nottingham (i.e. Clifton). Added requirement to ensure new growth is considered as part of the next RSS review, in the Nottingham Core HMA and Hucknall. However **the south of Nottingham has been identified as an appropriate location for significant growth** which may require urban extensions.
- Affordable Housing totals are provided for monitoring; the targets to be adopted should reflect up-to-date housing market assessments. **A new policy relating to affordable housing in rural areas has been added.**
- A new policy on Strategic Distribution mentions a location in the Nottingham Core HMA (but not elsewhere in Notts).
- Reference to damage to EU designated Natura 2000 sites has been broadened to direct or indirect, this affects Sherwood Forest.
- A revised Waste Management Policy. For 3 Cities there should be a centralised pattern of large facilities development.

Other key changes include:

- The Policy for rural priorities has been integrated, in a shortened form, within the policy for urban concentration. Economic activity has been added to the term 'development'.
- Significant increase in references throughout to climate change and the implementation of measures to address it. This has filtered into policies, including design, biodiversity, transport, energy, water resources.
- A new policy on Air Quality
- Section 4(4) authorities will be responsible for implementing the Sub-Regional Strategy (ies) through a proposed free-standing Implementation Plan to be published and updated by the Regional Planning Body (i.e. the East Midlands Regional Assembly) on a regular basis.

Appendix B

Nottinghamshire County Council Schedule of Representations on the RSS
Proposed Changes.

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
<i>Whole Plan</i>	<i>Accept Panel Recommendation.</i>	<i>Pages and paragraphs are re-numbered throughout the revised draft Plan. Most policies are also re-numbered as some policies have been deleted, or merged, and some new policies are added. Sub-regional sections in Part 2 of the RSS have also been re-numbered in sequence to follow on from Part 1.</i>	<i>Support the clarity afforded by renumbering.</i>
<i>New paragraph after paragraph 1.2.2</i>	<i>Accept. (For clarity “or” is added before “mitigation” in line 8 of the paragraph.)</i> <i>In response to recommendation R2.14 a reference to the Climate Change Programme of Action has also been added.</i>	<i>Add a new paragraph after paragraph 1.2.2 to read:</i> “1.2.3 Climate change is now widely recognised to be the most significant issue for the future of the Region cutting across all land use sectors and affecting the East Midlands’ environment, economy and quality of life. Many policies in this RSS specifically deal with climate change adaptation and/or mitigation in some way. These need to be seen as part of an overall, coherent strategy to deal with a major long-term problem that demands an immediate and co-ordinated response. In particular, plan users are referred to policies on: <ul style="list-style-type: none"> • Promoting better design (Policy 3); • Enhancing biodiversity (Policy 28); • Managing and increasing woodland cover (Policy 30); • Water resources and quality (Policy 32); • Energy (Policies 38 and 39); • Transport (Policies 42-55). 	<i>Pleased to see that the County Council’s representations on adaptability to climate change have been accommodated in the revised policy and in part of the accompanying text.</i>

These policies reflect a

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		commitment to implement the Climate Change Programme of Action commissioned by the East Midlands Climate Change Partnership.”	
<i>New supporting text at the beginning of Section 2</i>	<i>Accept Panel Recommendation. As a consequence of deleting Policy 2 (following R.3.2) Policy 4 needs to be moved to follow the new supporting text.</i>	<i>Add at the beginning of Section 2 and before Section 2.3 (Regional Priorities for Urban Communities):</i>	<i>Support the change</i>
<i>Policy 4</i>		<p>“Overview</p> <p>2.1.1 More than a third of the population of the region is concentrated in the urban areas around the three main cities of Derby, Leicester and Nottingham and these three conurbations also contain the main concentrations of public administration, business, education, health services and cultural activities. The three cities also have excellent communications with the rest of the region as well as good links to adjoining regions and beyond. Together they are increasingly working together as the Three Cities partnership in planning for growth and regeneration, for example in their joint New Growth Point arrangements.</p> <p>2.1.2 -</p>	
	<i>The need for additional wording in Policy 4 in response to R17.3 is not accepted as the point is covered in the proposed new supporting text to Policy 4.</i>		

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
<i>New text after paragraph 2.2.1</i>	<i>Additions have been made to set the revised Policy 3 (re-numbered as Policy 2) in the context of the Climate Change PPS and other policy updates.</i>	<p>2.1.9 further new text</p> <p><i>Move Policy 4 (re-numbered as Policy 3) and supporting text to follow new text.</i></p> <p><i>Add new paragraphs after paragraph 2.2.1 (re-numbered 1.4.1):</i></p> <p>“1.4.2 In securing a proportion of energy from decentralised and renewable or low-carbon sources, the Planning Policy Statement (PPS): Planning and Climate Change (which supplements PPS1) expects development plan documents to include policies which expect a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon sources. In the interim period, before DPDs are in place, all new developments of more than 10 dwellings, or for others uses exceeding 1,000m² floorspace, should secure at least 10% of their energy from decentralised and renewable or low-carbon sources unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.</p> <p>1.4.3 The policy refers to levels of building sustainability in the context of urban extensions. The Government</p>	<i>Pleased to see that the County Council’s representations on adaptability to climate change have been accommodated in the revised policy and in part of the accompanying text</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>confirmed in its Building a Greener Future policy statement that it sees considerable value in a strong national framework balanced with appropriate local flexibility in moving towards zero carbon homes. It has set a world leading target for all new homes to be zero carbon from 2016 by outlining a timetable to achieve a 25% reduction in carbon emissions from new homes by 2010, and 44% by 2013 before reaching zero carbon in 2016. These reductions will be required by national, and binding, building regulations. The Government also announced in this year's Budget an ambition for all new non-domestic buildings to be zero carbon from 2019 with consultation on the timeline and its feasibility.</p>	
		<p>1.4.4 Paragraphs 30-33 of the Climate Change PPS recognise that there will be situations where it could be appropriate for local planning authorities to anticipate levels of building sustainability, for identified development areas or site-specific opportunities, in advance of those set out nationally. The PPS makes clear that local planning authorities must be able to demonstrate the local circumstances that warrant and allow this and that any local requirement must be set out in a development plan</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		document to ensure it is properly tested. It also makes clear that local requirements should be specified in terms of achievement of nationally described sustainable buildings standards (the Code for Sustainable Homes in the case of housing)."	
Policy 4	<p>Accept in principle. The addition to sub-paragraph (a) includes a reference to new development being located "in and adjacent to" the region's 5 PUAs. This is necessary after deleting Policy 2 (in line with Panel recommendation R3.2) to indicate that some new development is likely to be needed on the edge of existing built up areas in the form of sustainable urban extensions. A clarifying addition is also made to sub-paragraph (b) and the final part of the original sub-paragraph (d) is also retained within the Policy</p>	<p>Add "and economic activity" after "Development" in the first line.</p> <p>Replace "significant levels of new development should be located in" in sub-paragraph (a) with "new development will be concentrated primarily in and adjacent to".</p> <p>Add "also" after "should" in the first line of sub-paragraph (b).</p> <p>Replace the first part and first bullet point in sub-paragraph (d) with:</p> <p>"The development needs of other settlements and rural areas should also be provided for. New development in these areas should contribute to:</p> <ul style="list-style-type: none"> maintaining the distinctive 	<p>Support the changes, especially reference to rural areas, in the light of the removal of policy 5 on rural priorities. (see objection to removal Policy 5 below).</p>

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	<p><i>as the Secretary of State considers that this point is not addressed elsewhere in policy.</i></p> <p><i>The new bullet point regarding quality of tranquility is also added to reflect the Sustainability Appraisal of the draft Plan.</i></p>	<p>character and vitality of rural communities;</p> <ul style="list-style-type: none"> • respecting the quality of tranquility, where that is recognised in planning documents; • strengthening rural enterprise and linkages between settlements and their hinterlands; and • shortening journeys and facilitating access to jobs and services.” 	
		<p><i>Responding to both recommendations R3.1 and R4.12 a new paragraph is added after sub-paragraph (d) to read:</i></p>	
		<p>“In assessing the suitability of sites for development priority should be given to making best use of previously developed land and vacant and under-used buildings, contributing to the achievement of a regional target of 60% of additional dwellings on previously developed land or through conversions.”</p>	
		<p><i>Another new paragraph is also added based on the original second bullet point in</i></p>	<p><i>Support also for the expression of use of previously developed land to “contribute to the achievement” of the target.</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<i>sub-paragraph (d) to read:</i>	
		<p>“In applying this policy the influence of major urban areas outside the Region should also be taken into consideration, particularly those fulfilling the role of PUAs for parts of the East Midlands, i.e. Peterborough, South Yorkshire and Greater Manchester, where policies in regional strategies for neighbouring regions will be relevant.”</p>	
<p><i>Paragraphs 2.3.11 and 2.3.12</i></p>	<p><i>Accept - also updated to reflect the latest position regarding New Growth Points and eco-towns.</i></p>	<p><i>Delete “provisionally designated” in the 3rd line of paragraph 2.3.11 and replace with “accepted”</i></p>	
		<p><i>Delete the “:” after “New Growth Points in the 4th line of paragraph 2.3.11 and the named towns and cities. Then add:</i></p>	
		<p>“These are not planning designations but arrangements whereby relevant local authorities have agreed higher growth targets in partnership with Government and are guaranteed access to increased levels of funding for necessary infrastructure.”</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
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Delete paragraph 2.3.12 and replace with:

“2.2.12 There are four New Growth Points in the region, ie the 3 Cities and 3 Counties (Derby, Leicester and Nottingham), Lincoln, Grantham and Newark. All these towns and cities are either Principal Urban Areas or Sub-Regional Centres and the proposed growth levels are in line with the policy of urban concentration envisaged in Policy 2.”

Support the inclusions of reference to New Growth Points.

Add a new paragraph following paragraph 2.3.12 headed “Eco-towns” to read:

“2.2.13 The Government also intends that a number of eco-towns will be built around the country. These are intended to be new settlements designed to achieve zero carbon development and built to the highest design standards. Several proposals have already been put forward in the East Midlands and the Government has indicated that further consideration will be given to proposals at Manby (Lincs), Pennbury (Leics) and

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<i>Policy 5</i>	<i>The Secretary of State agrees with the Panel that Policy 5 adds little to the provisions of PPS7.</i>	<p>at a further possible location in Rushcliffe Borough (Notts). These proposals are, however, outwith the scope of this RSS and the longer term issues that arise from these eco town proposals, such as the ultimate size of a new settlement, are issues for the next RSS review to test."</p> <p><i>Delete Policy 5.</i></p>	<i>The deletion of this policy addressing rural issues leaves a significant gap in the coverage of matters which are specific to these areas in the RSS. There are no other policies in the RSS which specifically relate to rural areas and their specific needs and aspirations. The County Council objects to the deletion of this policy.</i>
<i>Policy 8</i>	<i>Added in order to recognise the agreed Programme of Delivery related to the Newark Growth Point in RSS policy and to emphasise that the majority of the housing provision proposed within</i>	<p><i>Add a new bullet point to Policy 8 (re-numbered as Policy 7) to read:</i></p> <p>"ensuring that the agreed Growth Point Programme of Delivery at Newark is achieved both in overall numbers of dwellings and in the agreed phasing of development;"</p>	<i>Support the recognition of the Newark New Growth Point.</i>

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Policy 13	<p><i>Newark and Sherwood District is intended to be located at Newark.</i></p> <p><i>Reference to the Three Cities New Growth Point is added in order to recognise the agreed Growth Point Programme of Delivery in RSS policy.</i></p> <p><i>Other additions added to reflect the Sustainability Appraisal.</i></p>	<p><i>In 2nd sentence of Policy 13 (re-numbered as Policy 12) add after "ensuring that":</i></p> <p><i>"the agreed 3 Cities and 3 Counties Growth Point Programme of Delivery is achieved both in overall numbers of dwellings and in the agreed phasing of development and that"</i></p> <p><i>Add a new bullet point to read:</i></p> <p><i>"a balance in the provision of jobs and homes within urban areas to reduce the need to travel;"</i></p> <p><i>In 4th bullet, add after "between the cities": "to reduce car use, especially commuting."</i></p>	<p><i>Support the recognition of the Three Cities New Growth Point.</i></p>
Policy 14	<p><i>The Secretary of State has accepted that figures should take into account the 2004-household projections and other factors recommended by the Panel but has</i></p>	<p><i>Policy 14 has been re-drafted (and re-numbered as Policy 13). See the explanatory text and re-drafted policy in the Overview to this Schedule above.</i></p>	<p><i>There is an unrealistically high housing figure proposed for the Nottingham Core HMA, and the basis for this is flawed.</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<p><i>declined to invite local planning authorities to submit further evidence prior to the publication of these Proposed Changes. This is because to do so could be considered as giving local authorities a favoured status at this stage. Instead district housing provision figures based on the Panel's recommendations are included for general consultation.</i></p>		<p><i>A greater degree of flexibility to vary proportion of housing to be provided outside the Principal Urban Area (PUA) is needed; this currently too low and does not allow for regeneration, sustainable development and much needed affordable housing in settlements outside the PUA.</i></p>
			<p><i>The approach of using five year bands to effectively phase the delivery of housing over the plan period within each District are considered to be too restrictive.</i></p>
			<p><i>The approach adopted in the</i></p>

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			<p><i>Nottingham Core HMA of aligning Core Strategies should be reflected in the Proposed Changes with reference under joint working made to aligned Core Strategies.</i></p>
			<p><i>The approach of the Proposed Changes in applying a 19% uplift to the HMA and each local authority area (except Bassetlaw) without justification or explanation is arbitrary and unsatisfactory. It reflects short term, volatile trends that are not the basis of the current strategy. It is noted that further evidence is invited [separate sheets will present this evidence]. The provisional nature of the figures, in the</i></p>

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<i>Policy 14 and housing provision policies in the Sub-Regional Strategies</i>	<p><i>Accept Panel recommendation in respect to Policy 14. This policy has been re-drafted giving actual build figures for 2001-06, 5 year averages for 2006-2011 and 2011-16 and 10 year averages for 2016-26.</i></p> <p><i>Further explanation is given in the Overview to this Schedule above.</i></p> <p><i>However in respect to the equivalent policies in the sub-regional chapters it is considered that there is currently insufficient evidence to provide the same treatment to the sub-district apportionments.</i></p>	<p><i>Policy 14 (re-numbered as Policy 13) has been re-drafted. See the explanatory text and re-drafted policy in the Overview to this schedule above.</i></p> <p><i>Three Cities SRS Policy 4 (renumbered 3) and Lincoln Policy Area SRS Policy 4 have been recast to express apportionments as 2001-2026 totals instead of 2001-2026 annual averages.</i></p>	<p><i>light of prospective joint working, should be enshrined in the policy.</i></p> <p><i>There is insufficient evidence in the Nottingham Core HMA to provide district level totals as in the Policy, as well as the sub-district totals as mentioned.</i></p> <p><i>The expression of the housing figures in 5-year period raises difficulties of delivery and should be removed.</i></p>
<i>Policy 14 and relevant SRS</i>	<i>There is currently insufficient evidence to specify exactly</i>	<i>No change.</i>	<i>Agree with decision, but note that district totals must</i>

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<i>Policies</i>	<i>where and how large any urban extensions will be needed. Equally so the timing of urban extensions will need be determined taking into account a number of variable local factors.</i>		<i>therefore be provisional in the Nottingham Core HMA.</i>
<i>Policy 14 (and Three Cities SRS Policy 4)</i>	<i>The revised distribution recommended by the Panel is based on a joint statement from the relevant local planning authorities. However, this revised distribution does not achieve the total housing figure for the Nottingham Core HMA proposed in recommendation R4.1. Given that the Panel had little confidence in this revised distribution, the Secretary of State proposes an alternative revised distribution based on the proportional increase of the Draft RSS figures in order to meet</i>	<i>The district level distribution of the housing figure for the Nottingham Core HMA is proposed in Policy 14 (re-numbered as Policy 13) and Three Cities SRS Policy 4 (re-numbered as Three Cities SRS Policy 3).</i>	<i>The approach of the Proposed Changes in applying a 19% uplift to the HMA and each local authority area (except Bassetlaw) without justification or explanation is arbitrary and unsatisfactory. The provisional nature of the figures, in the light of prospective joint working, should be enshrined in the policy.</i>

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Policy 14	<p><i>the Nottingham Core HMA target recommended in R4.1.</i></p> <p><i>The Secretary of State accepts that in a strategy based on urban concentration housing provision that is based economically on Sheffield and the South Yorkshire towns should be planned as close to the Sheffield-Rotherham Principal Urban Area (PUA) as possible.</i></p> <p><i>However she accepts that the figures included in the draft RSS for the districts in the Northern HMA were already below trend and she considers that limiting new housing in Bassetlaw and North East Derbyshire as much as that suggested by the Panel could disadvantage the regeneration needs of these districts.</i></p> <p><i>Consequently she has not accepted</i></p>	<p><i>See proposed changes to Policy 14 (re-numbered as Policy 13) in the Overview to this Schedule above.</i></p>	<p><i>Support the changes.</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
Policy 14	<p><i>the Panel's recommendations for these districts. The Secretary of State accepts the Panel recommendation but considers that this option should also apply equally to all Housing Market Areas. She also accepts that it is necessary to ensure that the proportion of development directed to the PUAs is not reduced from that originally proposed in the draft RSS, in order to maintain the same strategy of urban concentration.</i></p>	<p>Add the following text to the end of Policy 14 (re-numbered as Policy 13):</p> <p>“A redistribution of District and Unitary apportionments to meet the Housing Market Area minima via sound joint Core Strategies will be acceptable, provided that the policy of urban concentration for the Principal Urban Areas as summarised below is achieved:</p> <p style="padding-left: 40px;">Central Lincolnshire HMA: 44% within or adjoining Lincoln PUA</p> <p style="padding-left: 40px;">Derby HMA: 55% within or adjoining Derby PUA</p> <p style="padding-left: 40px;">Leicester & Leicestershire HMA: 47% within or adjoining Leicester PUA</p> <p style="padding-left: 40px;">Nottingham Core HMA: 78% within or adjoining Nottingham PUA</p> <p style="padding-left: 40px;">Northampton HMA: 65% within or adjoining Northampton PUA</p>	<p>Evidence (to be presented in the response) indicates that the Nottingham Core HMA figure should be presented as a 'minimum of 76% within or adjoining Nottingham PUA'.</p>
Policy 14	<p>Accept. [Note that Policy 14 has also been extensively re-</p>	<p>Delete the last paragraph commencing “housing provision...” and following bullet points from the policy</p>	<p>Support the change</p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
Paragraph 3.1.8 and Policy 15	<p><i>drafted in line with the Panel’s recommendations R4.1 and R4.2. See Overview to this Schedule above for further explanation.]</i></p> <p><i>Accept Panel recommendation.</i></p>	<p><i>and include the deleted text as a new paragraph (paragraph 3.1.5) positioned after the first part of paragraph 3.1.4.</i></p> <p><i>In the first line of paragraph 3.1.8 (re-numbered 3.1.9) replace “The indicative targets set out in Policy 15” with “Indicative targets for monitoring purposes are set out in Policy 14. These”</i></p> <p><i>Delete the 4th sentence in paragraph 3.1.8 and change “Policy 14” in line 9 to “Policy 13”.</i></p> <p><i>Delete Policy 15 and replace with:</i></p> <p>“Policy 14</p> <p>Regional Priorities for Affordable Housing</p> <p>Local Development Frameworks, housing strategies and investment plans should have regard to the priorities identified in the Regional Housing Strategy, and include policies seeking the provision of a mix of dwellings in terms of size, type, affordability and location, having regard to the existing local stock, in order to help create inclusive communities which provide wider housing opportunity and</p>	Support the changes

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
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choice. As part of their Local Development Frameworks local planning authorities should adopt affordable housing targets in line with the conclusions of the most up to date Housing Market Area Assessments for their area. For monitoring purposes indicative affordable housing targets are set out below, representing the total amount of affordable housing for each HMA for the period 2001-26. These targets do not represent a maximum for each HMA.

Central Lincolnshire HMA: 14,400

Coastal Lincolnshire HMA: 5,500

Peterborough Partial HMA: 11,000

Newark/Ashfield/Mansfield (Nottingham Outer) HMA: 10,900

Northern (Sheffield/Rotherham) HMA: 12,100

Peak, Dales & Park HMA: 7,300

Derby HMA: 14,800

Leicester & Leicestershire HMA: 32,000

Nottingham Core HMA: 21,200

North Northamptonshire HMA: 17,200

West Northamptonshire HMA: 21,800

East Midlands Region:
168,400"

Paragraph 3.1.11 and

The Secretary of State accepts the

Delete 3rd sentence and bullet points in paragraph 3.1.11 and add new text following on from the 2nd sentence of

Support the changes

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
new policy after Policy 15	<i>principle of a new policy on rural affordable housing but considers that there is a need for the policy to be aligned more with the requirements of PPS3. The bullet points in paragraph 3.1.11 have therefore been replaced with updated information and further supporting text has been added.</i>	<p>paragraph 3.1.11(re-numbered 3.1.12) and a new Policy 15:</p> <p>“This strategy seeks to address the particular issues that the region’s rural areas are experiencing, ranging from deprivation and social exclusion, for example in the Meden Valley area or acute affordability pressures in remote areas such as, amongst others, the Derbyshire Dales. Providing appropriate levels of new housing in suitable locations is key to achieving the overall aim of creating sustainable rural communities. Whilst the focus is on new housing to meet local needs, particularly by providing affordable housing, rural areas will also require market housing if they are to prosper. New homes must be of a high quality which enhances the character and biodiversity of rural areas whilst respecting the regions particular rural features.</p> <p>3.1.13 For affordable housing in rural areas, local authorities and housing providers should use all available policy mechanisms to provide new homes by:</p> <ul style="list-style-type: none"> • setting separate targets for rural affordable housing within Local Development Frameworks • setting an appropriate threshold site size, above which affordable housing may be sought; • allocating sites solely for 	

<i>Paragraph or Policy No.</i>	<i>Reasons for Change</i>	<i>SoS Proposed Changes to Draft Regional Plan</i>	<i>NCC Comment</i>
		<p>affordable housing in LDFs;</p> <ul style="list-style-type: none"> • using rural exception site policies where appropriate; • use of Section 106 agreements to ensure delivery and/or retention of affordable housing in perpetuity; • considering shared ownership without grant as well as social renting; • considering housing associations borrowing potential; • purchasing within the existing stock, particularly former council housing; • re-using suitable redundant farm buildings for affordable housing ; • creating Community Land Trusts to retain affordable housing in perpetuity; and • coordinating delivery across boundaries to ensure an effective approach to affordable housing having regard to changing housing market conditions and land supply. 	
		<p>3.1.14 There are particular priorities in rural areas, where considerable amounts of deprivation and disadvantage still exist. In such areas it is very important to create sustainable rural communities,</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
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ensuring appropriate levels of new growth to allow rural communities to flourish and thrive. The prime objective should be to help local people to live and work in the area where they were brought up. Allied to this, the development of the rural economy also needs to be encouraged in line with the principles expressed in PPS7 Sustainable Development in Rural Areas. Achieving these objectives should be set against the need to avoid unsustainable patterns of new development which could lead to more and longer journeys, particularly in areas close to major urban centres where growth in unsuitable locations could encourage increased levels of commuting

Policy 15

Regional Priorities for Affordable Rural Housing

New housing in rural areas should contribute to :

- creating sustainable rural communities through a choice of well designed homes;
- addressing affordability issues by providing appropriate levels of housing

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>in suitable locations;</p> <ul style="list-style-type: none"> • maintaining the distinctive character of rural areas and respecting the quality of tranquillity; • strengthening rural enterprise and supporting economic growth, particularly linkages between settlements and their hinterlands; and • compact, sustainable patterns of development which facilitate access to jobs and services.” 	
<p><i>Paragraphs 3.1.14 and 3.1.15, Policy 16 and Appendix 3</i></p>	<p><i>Accept. In addition since the Examination Gypsy and Traveller Accommodation Assessments have been completed in Nottinghamshire, Lincolnshire, Derbyshire and Northamptonshire as well as Leicestershire and Rutland, and therefore additional pitch requirement figures are included in Appendix 3 (re-numbered Appendix 2) covering the</i></p>	<p><i>Delete paragraphs 3.1.14 and 3.1.15 and replace with:</i></p> <p>“3.1.17 Appendix 2 sets out minimum additional pitch requirements by local planning authority area, derived from up to date Gypsy and Traveller Accommodation Assessments (GTAAs).”</p> <p><i>Delete the second paragraph in Policy 16 and replace with:</i></p> <p>“Local Development Frameworks should make provision for the minimum additional pitch requirements set out in Appendix 2.”</p>	<p><i>The pitch requirements for Gypsies and Travellers for each District based on completed Gypsy and Traveller Accommodation Assessments are welcomed although a different means of deciding provision could have been used, removing some significant differences between districts, and some nil requirements, which although they are minima</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<i>whole region.</i>		<p><i>are unlikely to lead to sufficient provision across the whole area.</i></p> <p><i>The totals do not represent a regional re-assessment as set out in Government Guidance on Gypsy and Traveller Accommodation Assessments.</i></p> <p><i>Some re-distribution on the basis of 'bottom-slicing' similar to the process in the Eastern Region RSS is suggested to give a more even distribution and commitment from all local authorities.</i></p>
<i>Paragraph 3.1.18</i>	<i>Accept. No evidence was presented at the Examination to support the assumption.</i>	<i>Delete last two sentences.</i>	<i>In the light of this change (to remove a reduction in vacancy rates) the monitoring of housing provision should take account of</i>

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			<i>a contribution to housing stock from changes in vacancy rates. This was inherent in the Draft RSS approach.</i>
<i>Paragraph 3.1.22</i>	<i>To reflect the Appropriate Assessment.</i>	<i>Add between 3rd and 4th sentences:</i> <i>“In particular, through phasing of development, infrastructure should be in place that would avoid pressures and discharges to the environment that would potentially harm designated sites of international nature conservation importance.”</i>	<i>Support the changes</i>
<i>Policy 17</i>	<i>Accept Panel recommendation.</i>	<i>Responding to both recommendations R3.1 and R4.12 a new paragraph is added to Policy 4 (re-numbered as Policy 3) after sub-paragraph (d) to read:</i> <i>“In assessing the suitability of sites for development priority should be given to making best use of previously developed land and vacant and under-used building, contributing to the achievement of a regional target of 60% of additional dwellings on previously developed land or through conversions.”</i>	<i>Support the changes</i>
<i>Policy 18</i>	<i>Change required for consistency with other parts of</i>	<i>After “Nottingham Core HMA” add “and Hucknall”.</i>	<i>Support the change; this clarifies the</i>

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	<i>the Regional Plan.</i>		<i>position.</i>
<i>New policy before Policy 19</i>	<i>Accept Panel recommendation with minor redrafting to reflect economic priorities in the text more fully.</i>	<i>Add new policy to be placed before paragraph 3.2.4 to read:</i> “Policy 18	<i>Support the changes</i>
		Regional Priorities for the Economy Local authorities in all parts of the region should work together with emda and other organisations with relevant responsibilities to encourage and foster the regional economy through implementing the Regional Economic Strategy. It will be especially important to raise skill levels, develop the service sector and high value manufacturing and create innovative businesses, so that the region is better placed to maintain economic competitiveness.”	
<i>Policy 19</i>	<i>Accept Panel recommendation.</i>	<i>Add two new paragraphs after the bullet points in Policy 19:</i> “For regeneration to be successful concerted action is needed across the whole spectrum of local governance and local development documents should translate this into	<i>Support the changes; this helps clarity.</i>

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		the action required locally.	
		In addition regeneration of all priority areas must conform with the strategy of urban concentration set out in Policy 3.”	
<i>Policy 20</i>	<i>Accept Panel recommendation.</i>	Replace Policy 20 with the following, to be placed after paragraph 3.2.8: “Policy 20 Regional Priorities for Employment Land Local authorities, emda and sub-regional strategic partnerships should work together in housing market area groupings to undertake and keep up to date employment land reviews to inform the allocation of a range of sites at sustainable locations. These allocations will: <ul data-bbox="724 1230 1162 1869" style="list-style-type: none"> • be responsive to market needs and the requirements of potential investors, including the needs of small businesses; • encourage the development of priority sectors as identified in the Regional Economic Strategy, namely transport equipment, food and drink, healthcare and construction as well as specific sectors which have local economic significance; • serve to improve the regeneration of urban areas; • ensure that the needs of high technology and knowledge based industries are provided for; • promote diversification of the 	Objections are raised to the deletion of the requirement for strategic distribution centres to generate 10% of their energy requirements from on – site renewables. (see also comments on Policy 21)

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		<p>rural economy;</p> <ul style="list-style-type: none"> assist the development of sites in the Priority Areas for Regeneration; and be of a scale consistent with the essential policy of urban concentration as set out in Policy 3.” 	
<i>New policy following Policy 20</i>	<i>Accept Panel recommendation with clarification added related to accommodating large maritime containers within any site, an addition to the 11th bullet point suggested by the Sustainability Appraisal and a new bullet point to reflect the Appropriate Assessment.</i>	<p><i>Add a new policy after paragraph 3.2.9:</i></p> <p>“Policy 21</p> <p>Strategic Distribution</p> <p>Local authorities, emda, Sub-Regional Strategic Partnerships, the Highways Agency and Network Rail should work together with private sector partners to bring forward sites for strategic distribution use in the region with preference to sites in the following broad locations:</p> <ul style="list-style-type: none"> West Northamptonshire housing market area Derby housing market area Nottingham Core housing market area North Northamptonshire housing market area Leicester and Leicestershire housing market area <p>In allocating sites in local development documents local authorities should give priority to sites which can be served by rail freight, and operate as inter-modal</p>	<i>Objections are raised to the deletion of the requirement for strategic distribution centres to generate 10% of their energy requirements from on – site renewables. See also comments on Policy 20.</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>terminals.</p> <p>Consideration should be given to the following criteria:</p> <ul style="list-style-type: none"> • at least 50 hectares of developable land; • good rail access with routes capable of accommodating large maritime containers (W10 or W12 gauge), the ability to handle full length trains, available capacity and full operational flexibility; • good access to the highway network and to appropriate points on the trunk road network; • a suitable configuration which allows large scale high bay warehousing, inter-modal terminal facilities, appropriate railway wagon reception facilities and parking for all goods vehicles; • a need for such facilities due to demand from the logistics industry; • a location which allows 24 hour operations and which minimises environmental and community impact; • good access to labour; and • the need to avoid locations near to sensitive nature conservation sites that have been designated as being of international importance, or that would directly increase traffic levels that would harm such sites” 	
<i>Policy 24</i>	<i>To reflect the Sustainability Appraisal and Appropriate</i>	<p><i>Add as 2nd sentence of Policy 24 (re-numbered Policy 41):</i></p> <p>“Potentially adverse effects on internationally designated nature</p>	<i>Support the change</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<i>Assessment.</i>	conservation sites should be avoided or mitigated.”	
		<i>In the first bullet of Policy 24 (re-numbered as Policy 41), after “infrastructure capacity”, add:</i>	
<i>Policy 26</i>	<i>Accept Panel recommendation.</i>	“, particularly those within walking and cycling distance.” <i>Amend 2nd bullet point in Policy 26 to read “neither direct nor indirect damage to EU designated Natura 2000 sites will be permitted”.</i>	<i>Support the change</i>
<i>Policy 26 and paragraph 3.3.6</i>	<i>Accept Panel recommendation.</i>	<i>Add to the beginning of paragraph 3.3.6:</i>	<i>Support the change</i>
		“International designations for nature conservation include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. National sites also include National Nature Reserves (NNRs), and Sites of Special Scientific Interest (SSSIs). All these should be given the highest level of protection.”	
<i>Policy 27</i>	<i>Accept Panel recommendation and reflect the Appropriate Assessment.</i>	<i>Add to the beginning of 4th bullet point in Policy 27 (re-numbered as Policy 28): “within Local Development Frameworks”.</i>	<i>Support the change</i>
		Add to the penultimate bullet point:	
		“, without increasing pressures	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		on sensitive sites, especially those designated under the European Habitats Directive;”	
<i>Paragraph 3.3.12</i>	<i>Accept Panel recommendation.</i>	<i>Add ‘Climate change seems likely to increase pressure on such habitats’ as the penultimate sentence in paragraph 3.3.12. Also add “also” before “prejudice” in the final sentence.</i>	<i>Support the change</i>
<i>Policy 29</i>	<i>To reflect the Sustainability Appraisal.</i>	<i>In first paragraph of Policy 29 (re-numbered as Policy 30) delete “in ways that respect local landscape character and support the implementation of the Regional Plan” and replace with:</i> <i>“New cover should respect local landscape character, make use of species resistant to climate change and complement national and regional woodland strategies, including for example, the Woodfuel Strategy.”</i> <i>Add new sentence to 2nd paragraph to read:</i> <i>“New woodland should also avoid negative effects on water resources, and contribute to flood alleviation and floodplain management.”</i>	<i>Support the change</i>
<i>Policy 32</i>	<i>Accept Panel recommendation and to reflect the Sustainability Appraisal and</i>	<i>In 3rd bullet point add “and in regeneration” after “in new development”.</i>	<i>Changes supported</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<i>Appropriate Assessment.</i>	<i>Add new bullet point(after 5th bullet) to read:</i>	
		“protect the integrity of nature conservation sites designated as being of international importance, particularly through the phasing of development to match the availability of water resources;”	
		<i>Add to 6th bullet:</i>	
		“, taking account of predictions of future climate change”	
		<i>In 7th bullet add:</i>	
		“These will be required where development is upstream of a designated nature conservation site of international importance or to improve water quality, where the need is demonstrated through water cycle studies;”	
		<i>In final bullet delete “whilst maintaining water quality to acceptable standards.” and add new 7sentence to read:</i>	
		“Necessary improvements should be in place so that development does not compromise the quality of	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		discharged effluent.”	
<i>Policy 35 and paragraphs 3.3.41 and 3.3.42.</i>	<i>Accept Panel recommendation in relation to the need for clarity in paragraph 3.3.41 and the change also responds to the Appropriate Assessment. The explanation in paragraph 3.3.42 already covers the importance of Sustainable Drainage techniques.</i>	<i>Amend the final sentence in paragraph 3.3.41 to read:</i> “For example account needs to be taken of the effect of run-off from development upstream on locations downstream of it, particularly if a designated site might be affected.”	<i>Changes supported</i>
<i>Policy 35</i>	<i>To reflect the Sustainability Assessment of the draft Regional Plan.</i>	<i>Add to the end of the first sentence of the policy, before bullets:</i> “take account of the potential impact of climate change on flooding and land drainage. In particular, they should...”	<i>Changes supported</i>
<i>New policy on Air Quality and supporting text</i>	<i>The Appropriate Assessment required under the European Habitats Directive highlighted the possible effects of poor air quality on some sensitive sites of European importance within the region. The Secretary of accepts the need for a policy that could help to mitigate these</i>	<i>Add after Policy 35:</i> “Air Quality 3.3.43A Planning Policy Statements give advice on air quality issues and the relationship between the planning system and other regulatory regimes. PPS1 requires development plan policies to take account of environmental issues such as	<i>Changes supported</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<i>possible effects.</i>	<p>air quality and pollution, and PPS 23 advises that the planning system plays a key role in determining the location of development which may give rise to pollution, either directly or indirectly and in ensuring that other uses and developments are not, as far as possible, affected by major existing or potential sources of pollution. It also requires that the existing, and likely future, air quality in an area should be considered in the preparation of development plan documents and may also be material in the consideration of individual planning applications where pollution considerations arise.</p>	
		<p>3.3.43B The responsibilities of local authorities with regard to air quality are also set out in the Environment Act of 1995, and include a requirement to declare Air Quality Management Areas and draw up Air Quality Action Plans where it is considered that air quality objectives are unlikely to be met.</p>	
		<p>3.3.43C Within the region there are issues of air quality in some urban centres, along major transport routes and in terms of the impact of pollution on nature conservation sites of</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>European importance. The Appropriate Assessment on the Proposed Changes has identified possible impacts on three sites from traffic and land uses, and also indicates concerns over the impacts of future developments. These sites are:</p> <ul style="list-style-type: none"> • Birklands and Bilhaugh SAC • Peak District Dales SAC • South Pennine Moors SPA and Phase I and II SPAs 	
		<p>3.3.43D In preparing Annual Monitoring Reports, the RPB and Local Planning Authorities will need to take account of air quality indicators and relate these to relevant planning policies. Appropriate Assessment required for Local Development Documents and Local Transport Plans will also need to consider air quality effects on sensitive European sites even when the plan does not contain proposals directly adjacent to the sites.</p>	
		<p>Policy 35A Regional Priorities for Air Quality</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>Local Development Frameworks and the strategies of relevant public bodies should:</p> <ul style="list-style-type: none"> • contribute to reducing air pollution in the region; • consider the potential effects of new developments and increased traffic levels on air quality; and • consider the potential impacts of new developments and increased traffic levels on internationally designated nature conservation sites, and adopt mitigation measures to address these impacts.” 	
<p>Paragraph 3.3.46, Figure 1 and Policy 36</p>	<p><i>While no new evidence is available at present to vary or roll forward the apportionment figures in Figure 1 the Secretary of State considers that these should be reviewed at the earliest opportunity in order that they can be included in the next (partial) RSS review. This should provide</i></p>	<p><i>Add to paragraph 3.3.46:</i></p> <p><i>“These indicative figures will be reviewed and rolled forward as part of the evidence base for the next RSS review. This will provide updated sub-regional apportionments and give long term guidance to mineral planning authorities. When new figures are agreed relevant Local Development Frameworks will need to be amended accordingly.”</i></p>	<p><i>Comments supported</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
Policy 37 and Figure 3	<p><i>updated sub-regional apportionment figures to the end of the RSS period to provide long term guidance to minerals planning authorities.</i></p> <p><i>Accept Panel recommendations and to reflect the Appropriate Assessment.</i></p>	<p><i>Delete Policy 37 and replace with:</i></p> <p>“Policy 37</p> <p>Regional Priorities for Waste Management</p> <p>All relevant public and private sector organisations, including manufacturing, importing and packaging firms, should work together to implement the Regional Waste Strategy and promote policies and proposals that will result in zero growth in all forms of controlled waste by 2016 and waste being treated higher up in the ‘waste hierarchy’ set out in the National Waste Strategy.</p> <p>All Waste Collection Authorities and Waste Disposal Authorities should achieve a minimum target for the recycling and composting of Municipal Solid Waste of 30% by 2010 and 50% by 2015.</p>	<p><i>Object: For the 3 Cities Sub-Area there should be a centralised pattern of large facilities development which incorporates a hierarchical approach to waste management.</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>Waste planning authorities should make provision for waste management capacity equal to the amount of waste generated and requiring management in their areas, using the apportionment data set out in Appendix 4, subject to further research and analysis as part of the annual monitoring process.</p>	
		<p>In the Eastern Sub-area, the future pattern of provision should combine larger facilities in and around Lincoln and the sub-regional centres, with a dispersed pattern of smaller facilities in the more rural areas.</p>	
		<p>In the Northern Sub-area, the broad pattern of facilities should combine a centralised strategy of larger facilities on previously used land (including former colliery land) with the expansion of existing facilities.</p>	
		<p>In the Southern Sub-area, there should be a centralised pattern based around the expanding urban centres.</p>	
		<p>In the Three Cities Sub-area a centralised pattern of large facilities should be developed.</p>	
		<p>All other Development Frameworks should provide for</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>the minimisation of waste in the construction of and operation of new development, and encourage on-site waste management facilities.</p>	
		<p>Waste development plan documents should secure high standards of restoration and, where appropriate, the aftercare of waste management facilities to contribute to the objectives of the regional spatial strategy, particularly those relating to biodiversity, recreation and amenity.</p>	
		<p>Waste facilities should also be sited to avoid the pollution or disturbance of designated nature conservation sites of international importance. Increased traffic levels on roads near to sensitive sites should also be avoided.”</p>	
		<p><i>Delete Figure 3 and replace with a new Appendix 4, which is appended to the end of this schedule.</i></p>	
<p><i>Policy 38, paragraphs 3.3.63-69</i></p>	<p><i>The text has been changed to remove references to carbon neutrality</i></p>	<p><i>In paragraph 3.3.63 (re-numbered 3.3.64) delete “carbon neutral” in 4th sentence and replace with:</i></p>	<p><i>Changes supported</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<p><i>and to bring the supporting text into line with the Planning and Climate Change PPS (PPS1 Supplement). This uses “zero carbon” rather than “carbon neutral”.</i></p>	<p>“zero carbon”.</p> <p><i>In final bullet of paragraph 3.3.65 (re-numbered 3.3.66) delete “carbon neutral” and replace with:</i></p> <p>“the Government’s ambition of zero carbon”.</p>	
	<p><i>A reference has also been added to Section 1.4 of the Regional Plan, ie the supporting text to Policy 3 (re-numbered Policy 2) on Promoting Better Design which deals with similar issues.</i></p>	<p><i>Delete paragraph 3.3.68 and replace with:</i></p> <p>“3.3.69 The planning system can contribute to reducing energy demand through measures to improve the location of development, site layout and building design and as recognised in Section 1.4, the Planning and Climate Change PPS (PPS1 supplement) expects</p>	
	<p><i>The reference in Policy 38 to Supplementary Planning Documents has been removed to reflect paragraph 33 of the PPS.</i></p>	<p>development plan documents (DPDs) to include policies which promote and encourage a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon sources. The East Midlands will have significant growth in development over the Regional Plan period and new development will need to secure the highest viable resource and energy efficiency</p>	

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Paragraph 3.3.73	Accept Panel recommendation.	<p>in order to ensure that the Region can also make its contribution to the national carbon emissions reduction targets and longer term goals. To achieve this, substantial areas of new development need to be located where there is good accessibility by means other than the private car and where energy can be gained from decentralised energy supply systems, or where there is clear potential for this to be realised. These systems will include renewable or low carbon sources. In drawing up their Local Development Frameworks, local planning authorities should take account of the provisions of the Planning and Climate Change PPS and where policies need to be developed to respond to more local issues these should be included in DPDs. In doing this local planning authorities should also take account of any best practice deriving from innovative design including examples developed in eco-towns.”</p> <p><i>Delete the 3rd bullet and final sentence of Policy 38. In paragraph 3.3.73 delete the 4th sentence and replace with:</i></p> <p>“Coal mine methane also has a potential future role to play in</p>	Changes supported

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Paragraph 3.3.74	Accept Panel recommendation.	<p>the sustainable energy mix within the Region though currently there is uncertainty about the technology related to this resource and it is not eligible for renewable obligations certificates.”</p> <p><i>In paragraph 3.3.74 add after the first sentence and at the beginning of the second sentence:</i></p> <p><i>“To achieve the targets, however, there will need to be a complete change in attitude in current planning practice. Local planning authorities need to accept that far more energy generation schemes using innovative renewable technologies need to be accepted if renewable energy targets are to be achieved. Furthermore it...”</i></p>	Changes supported
Paragraph 3.3.76	Accept Panel recommendation.	<p>Add new paragraph following paragraph 3.3.75 to read:</p> <p>“The scale of the need to provide for more opportunities for renewable energy generation also indicates the pressing need for micro-generation schemes to be implemented as widely as possible. Local development documents should therefore encourage such schemes taking into account the advice</p>	Changes supported

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		in PPS22, the Companion Guide to PPS22 and the supplement to PPS1.”	
<i>Paragraph 3.3.77</i>	<i>Accept Panel recommendation.</i>	<i>Add new paragraph after paragraph 3.3.77 to read:</i>	<i>Changes supported</i>
		“While offshore renewable generation projects are not covered by RSS policies, PPS22 requires that an indication of the output that might be expected to be achieved from offshore renewables should be included though these are not included in regional totals. The relevant targets are 1315GWh/y for 2010, 3000GWh/y for 2020 and 3483GWh/y by 2026.”	
<i>Policy 39</i>	<i>Accept Panel recommendation.</i>	<i>These targets are also added to Appendix 5. In Policy 39 add at the beginning of the 2nd paragraph:</i>	<i>Changes supported</i>
<i>Policy 39</i>	<i>Accept Panel recommendation.</i>	“In order to help meet national targets, ” <i>No change.</i>	<i>Changes supported</i>
<i>Policy 39</i>	<i>To reflect the Appropriate Assessment.</i>	<i>Add to 9th bullet point:</i>	<i>Changes supported</i>
<i>Energy Section</i>	<i>Accept Panel recommendation.</i>	“, the integrity of designated nature conservation sites of international importance,” <i>A review of the Energy Section and related targets should be</i>	<i>Changes supported</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<i>included in the next RSS review.</i>	
<i>Energy Section</i>	<i>Accept Panel recommendation.</i>	<i>No change.</i>	<i>Changes supported</i>
<i>Transport Section</i>	<i>Accept Panel recommendation.</i>	<i>This is included in the list of issues to be addressed in the next review. See note f) in the Overview above.</i>	<i>Changes supported</i>
<i>Paragraphs 3.4.1-3.4.4</i>	<i>Further supporting text is added explaining and updating the context of the RTS and its fit with national policy and regional spatial policies in the RSS.</i>	<p><i>See note e) in the Overview above.</i></p> <p><i>Delete paragraphs 3.4..1-3.4.4 and replace with:</i></p> <p>“3.4 Regional Transport Strategy</p> <p>National and Regional Policy Context</p> <p>3.4.1 - 3.4.5 <i>New text</i></p> <p>RTS Core Strategy</p> <p>3.4.6 <i>The expected levels of population and household growth will require substantial increases in housing provision in almost all parts of the region and in order to limit as far as possible any growth in travel patterns the Spatial Strategy</i></p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p><i>proposes a distribution based primarily around a strategy of urban concentration. However growth on the scale proposed will inevitably lead to some increased demand to travel and this will necessitate careful management of the location of new areas of development and the encouragement of provision of alternative means of transport which are not wholly dependent on the private car. Consequently in line with national policy, the core strategy of the RTS focuses on encouraging the development of sustainable travel patterns through :-</i></p> <ul style="list-style-type: none"> <i>• reducing the need to travel, especially by car, and managing traffic growth and congestion;</i> <i>• significantly improving opportunities for walking and cycling;</i> <i>• improving the reliability, capacity, quality, accessibility and coverage of the public transport network;</i> <i>• making better use of existing transport networks through better management; and</i> <i>• only developing additional highway capacity when all other measures have been considered.</i> 	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
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3.4.7 *The RTS policies are designed to encourage modal shift away from the car to more sustainable forms of transport. They rest comfortably on national research demonstrating the potential effectiveness of the approach. Indeed, the development of behavioural change policy in the Transport White Paper drew upon this research ('Smarter Choices – Changing the way we travel', DfT July 2004). The research focussed on the range of transport policy initiatives which are now widely described as 'soft' measures. These seek to give better information and opportunities which affect the free choices made by individuals, mostly by attractive, relatively uncontroversial, and relatively cheap improvements which could yield significant reductions in traffic. They include:*

- *workplace and school travel plans;*
- *personalised travel planning, travel awareness campaigns, and public transport information and marketing;*
- *car clubs and car sharing schemes;*
- *teleworking, teleconferencing and home shopping.*

3.4.8 *It is envisaged that the implementation of the modal*

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		<p><i>shift policies in the RTS would primarily be through locally tailored packages of specific measures similar to that currently being developed by the North Northamptonshire Joint Planning Unit. This aims to secure 20% modal shift in new developments and 5% in existing ones.</i></p>	
		<p><i>3.4.9 There is also a significant amount of evidence to support RTS policies aimed at encouraging behavioural change through ‘harder’ measures. In respect of demand management, research (The Feasibility Study of Road Pricing in the UK – DfT 2004) concluded that, nationally, road pricing has the potential to reduce urban congestion by around half, from a reduction in urban traffic levels of only 3 to 4 per cent, as well as providing significant environmental benefits. Similarly, the importance of car parking in influencing journey mode choice is well known (PPG13) so the RTS includes a policy to regulate the provision of car parking spaces in new developments.</i></p>	
		<p><i>3.4.10 The inclusion of policies aimed at encouraging modal shift is not contradictory</i></p>	

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		<p><i>to the inclusion of proposals for new transport infrastructure in the RTS. The region is faced with a number of significant transport problems which are already very pressing and which are unlikely to be relieved by the impact of behavioural change policies in the short term. These problems have been the subject of a considerable degree of strategic analysis over recent years through such initiatives as the Multi-Modal Studies (MMS) and the Regional Funding Allocations (RFA).</i></p> <p>3.4.11 - 3.4.13 New text</p>	<p><i>The figures of 20% modal shift in new developments and 5% in existing ones are not supported in the Local Transport Plans and there is no indication as to how they would be delivered or what evidence base would be used.</i></p>
Appendix 2 Table 1	<p><i>Disagree. Table 1 provides useful background but as the housing provision figures are proposed to be expressed as annual averages over 5/10 year periods in Policy 14 (re-numbered as Policy 13) there is already an expression of residual needs built into the</i></p>	<p><i>Table 1 is updated to accord with Policy 14 (re-numbered as Policy 13) and becomes part of Appendix 1.</i></p>	<p><i>Object: The expression of the housing figures in 5-year period raises difficulties of delivery and should be removed.</i></p>

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Appendix 3	<p>figures. Table 1 is therefore proposed to remain in the appendices though as Table 2 is excluded (see R.4.4) it will be referred to as Appendix 1 with Table 2 replaced by a Regional Housing Trajectory.</p> <p>Accept. As Gypsy and Traveller Accommodation Assessments have now been completed throughout the Region additional pitch requirement figures are included in Appendix 3 covering the whole region.</p>	<p>Appendix 3 (re-numbered as Appendix 2) is revised to include updated additional pitch requirements.</p>	<p>The pitch requirements for Gypsies and Travellers for each District based on completed Gypsy and Traveller Accommodation Assessments are welcomed although a different means of deciding provision could have been used, removing some significant differences between districts, and some nil requirements, which although they are minima are unlikely to lead to sufficient provision across</p>

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			<i>the whole area.</i>
			<i>The totals do not represent a regional re-assessment as set out in Government Guidance on Gypsy and Traveller Accommodation Assessments.</i>
			<i>Some re-distribution on the basis of 'bottom-slicing' similar to the process in the Eastern Region RSS is suggested to give a more even distribution and commitment from all local authorities.</i>
<i>Appendix 5</i>	<i>Accept Panel recommendation.</i>	<i>Targets are also added to Appendix 5.</i>	<i>Changes supported</i>
<i>Appendix 5</i>	<i>Accept Panel recommendation.</i>	<i>Add footnote to the table in Appendix 5:</i>	<i>Changes supported</i>
<i>Appendix 5</i>	<i>Accept Panel recommendation.</i>	<i>"All targets are indicative." Replace footnote 4 in Appendix 5 with:</i>	<i>Changes supported</i>
		<i>"Landfill gas is not a natural renewable resource but it is eligible for renewable obligations certificates. Note that landfill gas contribution will</i>	

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		begin to tail off after 2020 due to reduced organic waste going to landfill.”	
Appendix 6	<i>The revision addresses the Panel’s recommendation and also adds specific policy references against each scheme listed. The revision is also consistent with the proposal to remove Appendix 1 from the RSS to become a freestanding Implementation Plan that will stand alongside the RSS and be maintained and updated on a regular basis. Schemes and measures removed from Appendix 6 should be considered in the context of the proposed Implementation Plan.</i>	<i>Revised Appendix 6 includes only committed transport schemes and measures and policy references are added.</i>	<i>Changes supported</i>
Three Cities SRS Policy 2, Paragraphs	<i>The recommendation to delete much of the Green Belt around</i>	<i>See note (c) in the Overview section above. The following changes are proposed:</i>	<i>The retention of the Nottingham Derby Green</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
4.8, 4.10, 5.12 and 5.13	<i>Nottingham is not accepted but the Secretary of State agrees with the Panel that there should be a wider review of land in the Nottingham Core HMA and Hucknall in order to identify the most sustainable broad locations for urban extensions around the conurbation.</i>	<p><i>Delete paragraph 4.8 (re-numbered 4.2.16) and replace with:</i></p> <p>“As part of the evidence base for the preparation of the RSS review a strategic review of the Nottingham-Derby Green Belt was undertaken. This review also looked at the case for adding land, as well as removing land, to and from the Green Belt.”</p> <p><i>Delete the first two sentences in paragraph 4.10 (re-numbered 4.2.17) and replace with:</i></p> <p>“In considering the development needs over the next 20 years within the Nottingham Core HMA and Hucknall a further review covering the whole of that area will need to be done urgently in order to identify the most sustainable locations for growth. This review will need to consider locations both within the existing built up area and elsewhere, including areas currently within the Green Belt, relating them to existing and future infrastructure provision and to the ease of access, particularly by public transport, to places of work and other</p>	<p><i>Belt and the recommendation for a full review is supported.</i></p> <p><i>(N.B. See below).</i></p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
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facilities and services.”

Delete Three Cities SRS Policy 2 and replace with:

“Three Cities SRS Policy 2

Sub-Regional Priorities for Green Belt Areas

The principle of the Nottingham-Derby and Burton-Swadlincote Green Belts will be retained. However a comprehensive review of the most sustainable locations for growth within the Nottingham Core HMA and Hucknall will be required urgently to consider how to accommodate future growth requirements over at least the next 25 years. As this may include considering locations within the Green Belt, when undertaking this review through their Local Development Documents, local planning authorities will have regard to:

- the level of growth proposed in Regional Plan Policy 13 and in Three Cities SRS Policy 4 identifying the locations for future development;
- sustainable development principles;
- the principles and purposes of including land in Green Belt set out in PPG2; and
- where changes to the Green Belt are proposed,,

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		<p>the retention of existing, or creation of new, defensible boundaries based on natural features or other barriers such as major roads.</p>	
		<p>This review will need to be done as part of the evidence base underpinning the next RSS review.”</p>	
		<p><i>Delete paragraphs 5.12-5.13 (re-numbered 4.2.30 and 4.2.31) and replace with:</i></p>	
		<p>“NOTTINGHAM CORE HMA AND HUCKNALL</p>	
		<p>4.2.30 In the Nottingham Core HMA and Hucknall further work on identifying the precise scale of urban extensions is required. A study has been commissioned by the 3 Cities and 3 Counties New Growth Point partnership to consider where the most sustainable locations for urban extensions could be identified. Based on the evidence from this study the six local planning authorities in this area should identify both the precise scale and location of sustainable urban extensions, sufficient to</p>	<p><i>Recommend text reads “This review will also become part of the evidence base underpinning</i></p>

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		<p>provide for the identified development needs until at least 2026, with an indication of where further future growth would best be sited if development needs continued beyond 2026. Local Development Documents should also examine the case for supporting regeneration at Stanton and Cotgrave through brownfield development, and consider whether a case could be made for an eco-town within the area.</p>	<p><i>the next RSS review.”</i></p> <p><i>The inclusion of paragraph 4.2.30 is supported as it recognises the work that is underway in the Nottingham Core Housing Market Area. However, objection is made to the words “and consider whether a case could be made for an eco-town within the area”; This is not consistent with sub paragraph (d) on page 10 of the Schedule of Proposed Changes that states “[Eco-town] proposals are not taken into account in this RSS review and ... any longer term issues that may arise from these proposals ... will be issues for the next RSS review to test.” Neither is it consistent with changes to the 3 Cities SRS Policy 4 where it is stated “The Secretary of State agrees with the Panel that any consideration of a different spatial distribution of growth should form</i></p>

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			<p><i>part of the preparation for the next RSS review. “ In addition, the consideration of a case for an Eco-Town is not a matter for an LDF.</i></p>
			<p><i>Objections are raised to the inclusion of paragraph 4.2.31. Whilst the South of Nottingham may be an appropriate location for growth on based on the purposes of the Green Belt, the Green belt is only one such consideration. Studies commissioned by the respective local authorities on possible locations for growth considered a range of issues, not solely green belt..</i></p> <p><i>This paragraph is also at odds</i></p>

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		<p>4.2.31 The south of Nottingham has been identified as an appropriate location for significant growth, as it causes least harm to the purposes of the Green Belt and avoids areas of high landscape value to the east of the PUA. The level of development proposed in Rushcliffe may also require urban extensions to be identified on the edge of the PUA. Growth Point resources will be used to ensure sustainable delivery.”</p>	<p><i>with the proposed addition to the paragraph re-numbered as 4.2.23 which refers to the wider review of land.</i></p>
<p><i>Three Cities SRS paragraph 5.5</i></p>	<p><i>Changes allow for future re-assessment of the need for urban extensions and relate the text to the review of land in the Nottingham Core HMA and Hucknall proposed in Three Cities SRS Policy 2.</i></p>	<p><i>Minor update in 1st sentence in paragraph 5.5 (re-numbered as 4.2.23).</i></p> <p><i>Delete 2nd sentence and replace with:</i></p> <p><i>“In the Nottingham area sustainably located urban extensions will need to be considered following the review of land in the Nottingham Core HMA and</i></p>	<p><i>The inclusion of this paragraph is supported as it reflects the work being carried out by the local authorities in the HMA.</i></p>

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Paragraph 5.13 and Three Cities SRS Policy 4	<i>The Secretary of State agrees with the Panel that this locational reference is too site-specific for inclusion in RSS policy.</i>	Hucknall proposed in Three Cities Policy 2.” <i>Delete paragraphs 5.12 and 5.13 and replace with new paragraphs 4.2.30 and 4.2.31. See the changes to Three Cities SRS Policy 2 above responding to recommendation R14.2.</i>	<i>This change is supported.</i>
Three Cities SRS Policy 4 (and Policy 14)	<i>The revised distribution recommended by the Panel is based on a joint statement from the relevant local planning authorities. However, this revised distribution does not achieve the total housing figure for the Nottingham Core HMA proposed in recommendation R4.1. Given that the Panel had little confidence in this revised distribution, the Secretary of State proposes distribution based on the proportional increase of the Draft RSS figures in order to meet the Nottingham Core HMA target</i>	<i>The district level distribution of the housing figure for the Nottingham Core HMA is proposed in Policy 14 (re-numbered as Policy 13) and Three Cities SRS Policy 4 (re-numbered as Three Cities SRS Policy 3).</i>	<i>The approach of the Proposed Changes in applying a 19% uplift to the HMA and each local authority area (except Bassetlaw) without justification or explanation is arbitrary and unsatisfactory. The provisional nature of the figures, in the light of prospective joint working, should be enshrined in the policy.</i>

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Three Cities SRS Policy 4 (and Policy 14)	<p>recommended in R4.1.</p> <p>The Secretary of State accepts the Panel recommendation but considers that this option should also apply equally to all Housing Market Areas. She also accepts that it is necessary to ensure that the proportion of development directed to the PUAs is not reduced from that originally proposed in the draft RSS, in order to maintain the same strategy of urban concentration.</p>	<p>Add the following text to the end of Policy 14 (re-numbered Policy 13):</p> <p>“A redistribution of District and Unitary apportionments to meet the Housing market Area minima via sound joint Core Strategies will be acceptable, provided that the policy of urban concentration for the Principal Urban Areas as summarised below is achieved:</p> <p style="padding-left: 40px;">Central Lincolnshire HMA: 44% within or adjoining Lincoln PUA</p> <p style="padding-left: 40px;">Derby HMA: 55% within or adjoining Derby PUA</p> <p style="padding-left: 40px;">Leicester & Leicestershire HMA: 47% within or adjoining Leicester PUA</p> <p style="padding-left: 40px;">Nottingham Core HMA: 78% within or adjoining Nottingham PUA</p> <p style="padding-left: 40px;">Northampton HMA: 65% within or adjoining Northampton PUA</p>	<p>Evidence (to be presented in the response) indicates that the Nottingham Core HMA figure should be presented as a ‘minimum of 76% within or adjoining Nottingham PUA’.</p>
Three Cities SRS Policy 4	<p>Accept Panel recommendations insofar as the policy should not prejudice the LDF</p>	<p>Delete Policy 3 and replace with:</p>	<p>Evidence (to be presented in the response) indicates that the Nottingham</p>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
	<p><i>process by specifying the amount or nature of development to take place at SRCs. However, for reasons of clarity and consistency the Secretary of State considers that it is appropriate that a standard wording for districts in the Three Cities Sub-Region should be used based on R14.14 & R14.15.</i></p>	<p>“Three Cities SRS Policy 3</p> <p>Housing Provision</p> <p>Within the context set by Regional Plan Policy 13, provision for new housing will be made at the following levels over 2001-2026:</p> <p>[Derby & Leicester HMA text removed]</p>	<p><i>Core HMA figure should be presented as a ‘minimum of 76% within or adjoining Nottingham PUA’.</i></p> <p><i>This has implicit maxima for each district non-PUA total. It is recommended that the text expresses this appropriately. [text to be submitted]</i></p>
	<p><i>The Leicester PUA SHLAA considered at the EIP clearly identified capacity for some homes in the parts of Leicester PUA within Harborough District, and it was confirmed at the EIP that this had informed the housing distribution in the draft RSS. For clarity and consistency a portion of the Harborough housing figure to be provided within or adjoining</i></p>	<p>NOTTINGHAM CORE HMA AND HUCKNALL TOTAL</p> <p>74,050 dws, of which 54,720 should be within or adjoining the Nottingham PUA</p> <p>Nottingham City: 28,100 dws, all within Nottingham PUA</p> <p>Broxtowe: 8,050 dws, of which 5,070 should be within or adjoining Nottingham PUA, including sustainable urban extensions as necessary. Development in the remainder of the District will be located mainly at Kimberley and</p>	

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	<i>Leicester PUA commensurate with the SHLAA findings is therefore identified.</i>	<p>Eastwood, including sustainable urban extensions as necessary.</p> <p>Erewash: 8,650 dws, of which 1,640 should be within or adjoining Nottingham PUA, including sustainable urban extensions as necessary. Development in the remainder of the District will be located mainly at Ilkeston, including sustainable urban extensions as necessary.</p> <p>Gedling: 9,200 dws, of which 6,680 should be within or adjoining Nottingham PUA, including sustainable urban extensions as necessary.</p> <p>Rushcliffe: 16,500 dws, of which 13,230 should be within or adjoining Nottingham PUA, including sustainable urban extensions as necessary.”</p> <p>Ashfield (Hucknall): 3,550 dws, within or adjoining Hucknall, including sustainable urban extensions as necessary.</p>	
<i>Northern SRS</i>	<i>Accept Panel recommendation.</i>	<i>Add as the third bullet point in paragraph 4.2 (re-numbered</i>	<i>Support for changes</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
paragraph 4.2		4.3.7) in the Northern SRS: “To improve the social infrastructure of the sub-area;”	
(and Policy 8)		See also the proposed change to Policy 8 above.	
Northern SRS Section 5 (paragraphs 5.1-5.7	<i>This section has been changed to reflect the revised distribution of housing provision and removing references to the trends based on the 2003-based household projections which had underpinned the housing provision figures included in the draft RSS.</i>	Delete Northern SRS Section 5 and replace with: “4.3.22 For the Sub-area as a whole the proposed requirement for new housing set out in Regional Plan Policy 13 takes account of the positive impact of regeneration initiatives, a strategy of concentration and regeneration, and the Newark Growth Point. 4.3.23 Significant growth should be concentrated in the Nottingham Outer Housing Market Area (HMA), where both the largest Sub-Regional Centre in the sub-area (Mansfield-Ashfield) and the Newark Growth Point are located. In the Mansfield-Ashfield area there is some infrastructure capacity, and significant urban capacity. The Nottingham Outer HMA also includes Hucknall but this area is excluded from the Northern SRS and is considered in the Three Cities SRS given its proximity to Nottingham. A separate housing provision figure of 3,550 dwellings is proposed for Hucknall. 4.3.24 In the Northern (Sheffield-Rotherham) HMA growth is proposed in accordance with the strategy of concentration and regeneration established in Regional Plan Policy 3. Recent house building has generated very high in-migration in	Support for these changes except as below. <i>Object to the figure set out for Hucknall, which does not reflect the submission of Ashfield District Council to the Examination-in-Public. This indicated that 4,000 dwellings could be accommodated. A consequent reduction (of 450 dwellings) should be made in the rest of Ashfield.</i> <i>[N.B provisional text]</i>

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>some parts of the HMA and there are concerns over the capacity of the area, particularly around Chesterfield, to accept large-scale growth, taking into consideration Green Belt constraints. Nevertheless regeneration is a priority, in accordance with Regional Plan Policy 19, and new house building is required to underpin economic growth in the area. The aim of the 'Northern Way' to support urban regeneration and growth within the Sheffield City Region is also recognised.</p>	
		<p>4.3.25 The individual housing provision for the three districts within the Nottingham Outer HMA and the four districts in the Northern HMA have been established on the basis set out below.</p>	
		<p>4.3.26 For that part of Ashfield covered by this SRS, provision is based on urban concentration and regeneration with no further Green Belt release. In Mansfield the provision figure recognises that while there is significant urban capacity and further job growth is expected, further greenfield land is likely to be required. In Newark & Sherwood the housing market is strong, and is likely to support higher levels of development. In addition the agreed Newark Growth Point Programme of Development establishes that around 500 dw pa should be concentrated at Newark (Regional Plan Policy 7 refers).</p>	
		<p>4.3.27 Provision for Bassetlaw supports the role of Worksop as a Sub-Regional Centre and responds to regeneration measures. Bolsover also has substantial regeneration needs and requires housing provision to enable economic and social regeneration. In Chesterfield, which is a Sub-Regional Centre, provision reflects the concentration</p>	

Paragraph or Policy No.	Reasons for Change	SoS Proposed Changes to Draft Regional Plan	NCC Comment
		<p>and regeneration strategy, but also acknowledges limitations to growth of the town. In North East Derbyshire, owing to the need to continue regeneration in those parts of the district where it is needed, provision is made on the basis that this would not require significant new development which would impact on the Sheffield/South Yorkshire Green Belt.”</p>	
<p><i>Northern SRS Policies 1 and 3 and paragraphs 6.12-6.14</i></p>	<p><i>Combining the policies causes some potential conflicts because the two lists of settlements do not match exactly. Instead paragraphs 6.12-6.14 and Northern SRS Policy 3 are brought forward to be positioned after Northern SRS Policy 1 to establish a closer relationship between the two policies. The addition of Sutton-in Ashfield and other suggested changes are accepted.</i></p>	<p><i>Move Northern SRS Policy 3 and supporting text to follow Northern SRS Policy 1; Policy 3 therefore becomes Policy 2.</i></p> <p><i>In Northern SRS Policy 3 (re-numbered as Northern SRS Policy 2) add Sutton-in Ashfield to the list of Sub-Regional Retail and Service Centres, delete the second category and add Retford to the lower list.</i></p> <p><i>In paragraph 6.13 (re-numbered 4.3.20) delete “The only other significant town centres in terms of size are in Retford and Sutton-in Ashfield. These and other” and replace with “Other”.</i></p> <p><i>In paragraph 6.14 (re-numbered 4.3.21) delete last sentence.</i></p>	<p><i>Support for these changes. N.B. The Proposed Changes document contains an error in repeating reference to Retford in NSRS Policy 3 (2)</i></p>

Appendix C. Nottingham City Council's response to the RSS Proposed Changes (*in plan order*)

CORE STRATEGY

a) Core Strategy

The Strategy still does not incorporate sufficient detail to help in preparing Local Development Documents, especially with regard to the provision of family housing in developments, the suitability of house types for their purpose (eg having adequate room sizes), and providing appropriate levels of supporting community infrastructure.

b) Para 1.2.3 – Climate change

The more comprehensive approach to Climate Change in para 1.2.3 is supported, however, a specific robust climate change policy should be added to the RSS to ensure that this issue gets the necessary priority.

c) Para 1.4.2 – Renewable Energy

The reference to 10% of energy being from renewable resources is noted, however, this would be better as a policy rather than supporting text, and consideration should be given to increasing the percentage, and it being a minimum.

d) New Policy 2 – Promoting Better design

The deletion of Policy 3 is inadequately covered by new Policy 2. Previously Policy 3 referred to BREEAM 'very good' and 'lifetime homes' standards, - objection is raised to the deletion of these references. Policy 3 also stated that all urban extensions should be 'carbon neutral', and this reference has now been deleted.

e) Former Policy 2 – Sequential approach

This Policy prioritised development in urban areas and set out a sequential approach to selecting land for development. The deletion of this policy is objected to, because these aspects are inadequately covered elsewhere in the plan.

TOPIC BASED PRIORITY and SUB-REGIONAL STRATEGIES

f) Paras 3.1.5 and 4.2.9 – Hucknall and Ilkeston

Para 3.1.5 refers to 'strengthening' the Sub-regional roles of Hucknall and Ilkeston, whilst para 4.2.9 talks about 'maintaining' their role. Clarification is needed. (given the low level of housing allocated to Hucknall, it is assumed para 4.2.9 is correct.)

g) Policy 13 and Three Cities SRS 3 – Housing Numbers (3 Cities Sub-Area map is Appendix 5)

(i) It is a matter of significant concern that the proposed dwelling provision for the Nottingham Housing Market Area (HMA) is too high:

It is considered that the use of the 2004 Household Projections to derive housing provision results in an unrealistically high figure for the HMA, and the approach is considered flawed because the revised Household Projections have been applied pro rata without any rethinking of the policy approach. The following reasons suggest that the increase should be less than that set out in the Proposed Changes:-

It assumes what has happened in the past will continue to happen, whether desirable or not. In the case of the Nottingham HMA, the period reflects a time of high international in-migration, and also already reflects existing policy. Projecting forward in these circumstances is likely to overstate housing need.

It is based on looking back over 5 year periods. Trends over shorter periods are highly volatile, and this is recognized in other areas of planning, such as retail, where trends are taken over a longer period of time. It is considered that using a 10 year trend would be more appropriate. Whilst still resulting in a higher housing provision figure for Nottingham HMA, this would moderate some of the short term effects.

Additionally, there is no recognition in the Proposed Changes of the increased level of infrastructure required to support the new levels of growth.

The approach of using trend based figures to derive housing numbers is one that has implications across the region, and beyond. If the current approach continues, and the 2006 based Household Projections are used to underpin the RSS Partial Review, it is likely that a further uplift of 20% over the Proposed Changes will have to be accommodated. A full debate on more appropriate approaches will be put forward through the Partial Review process.

The approach of the Proposed Changes in applying a 19% uplift to each local authority area without justification or explanation is also unsatisfactory. The Proposed Changes strongly encourage HMAs (through joint planning) to come

up with their own locally agreed distributions, yet it provides no strategic guidance for local authorities to work with, leading to further uncertainty.

ii) It is a matter of significant concern that the proposed dwelling requirement for Nottingham City is too high, and it is considered that the City can achieve a maximum figure of 1,000 net dwellings per annum 2006-2026 in line with the Joint Position Statement put to the Examination in Public. This is inline with the emerging initial Strategic Housing Land Availability Assessment. This would leave about 17,600 dwellings to provide 2008-26. Further:

- ▶ The level of housing growth over the last 5 years has been the highest for 30 years and is unlikely to increase over the longer term
- ▶ There is limited capacity within the urban area and the requirement of 28,100 dwellings would lead to too greater loss of existing open spaces, employment land and other uses which currently make up the mix of the City
- ▶ The requirement of 28,100 dwellings is above that of agreed Local Area Agreement indicators
- ▶ It should be noted that there are currently over 6,000 vacant dwellings in Nottingham alone

h) Policy 13 – 5 year phasing of housing requirement

The approach of using five year bands to effectively phase the delivery of housing over the plan period within each local authority area is considered to be too restrictive and it is better just have plan period figures. If the approach is to be adopted, then the banding should apply at HMA level only conurbation wide. This would allow the aligned Core Strategies to phase the release of large sites, based on evidence in the SHLAA studies and the 'Appraisal of Sustainable Urban Extensions' report published in June 2008, and to concentrate resources on delivery and infrastructure in selected areas, rather than spreading these across the whole HMA. It would also allow for deficits in one area to be made up in others.

i) Policy 13 and Three Cities SRS 3 - Principal Urban Area (PUA)/Non PUA Apportionment of housing provision (**PUA map is Appendix 6**).

The principle of urban concentration which drives the PUA/non PUA apportionment of housing provision is accepted and supported. However, the degree of urban concentration is much higher in the Nottingham HMA than anywhere else in the region, ie the proportion of new homes to be built in or on the edge of the PUA is much higher than any other PUA in the region (78% compared to the next highest, Northampton at 65%). This means that the proportion of housing to be provided outside the PUA is conversely much lower than elsewhere in the Region.

In some areas of the HMA, the low level of non PUA housing actually undermines the regeneration aims of the RSS eg regenerating Cotgrave, whilst

in others it will prevent sustainable development and delivery of much needed affordable housing in settlements.

The 78% does not even relate to the situation in Greater Nottingham, where if the Hucknall proportion is included in the non PUA portion, the proportion is about 74%.

It is therefore essential that a greater degree of flexibility to vary the PUA/non PUA apportionment is included in the final RSS, while still continuing to fully reflect urban concentration principles. Extra flexibility will allow for other aims of the RSS, such as regeneration, to be met outside the PUA. Early results from the Greater Nottingham SHLAAs fully support this more flexible approach.

If final RSS includes an apportionment lower than the current 78%, any concerns over further weakening of the policy of concentration on the PUA can be met by allowing Core Strategies to redistribute from the non PUA element to the PUA element, but not vice versa.

It is recommended that the PUA apportionment be 73% for the HMA and 69% for the HMA including Hucknall. If the provision figure for Nottingham falls to 1,000 per year, and this shortfall is redistributed within the HMA, then the apportionment should be reduced further.

j) Policy 13 & Policy 17 - Joint Working

The need to plan across HMAs is endorsed, indeed a HMA wide Joint Planning Advisory Board has been established in recognition of this fact. However, the approach adopted in this HMA of aligning Core Strategies is not adequately reflected in the Proposed Changes and is recommended that references to joint Core Strategies be changed to also include aligned Core Strategies.

k) Policy 20 - Employment Land Provision

It is a matter of concern that the consideration of employment land provision in the RSS continues to be inadequate. In particular, there is limited guidance on the scale of new employment land required, and no figures are given either on a Housing Market basis or on a District/Unitary basis.

More detailed guidance on this is required to provide a comprehensive view to be taken of the overall scale and distribution of development, currently the housing requirements of RSS have not taken account of employment land needs.

l) Policy 37 – Waste Management

The emphasis on centralised waste treatment facilities in the 3 Cities Sub-area is noted. However, this should not be at the expense of smaller scale facilities where these can be embedded in new development, avoid the need to transport waste over longer distances, or contribute to renewable energy targets in new development.

m) Policy 42 – Regional Transport Objectives

The emphasis on reducing the need to travel, and particularly behavioural change within the RSS is welcomed. The importance of designing measures in at an early stage of development needs to be emphasised.

n) Former Policy 43/ New Policy 44 – Traffic Growth Reduction

It is regrettable that the aim of reducing the rate of traffic growth to at least zero is to be deleted. In addition to reducing congestion in the PUAs it would be desirable for a target relating to outside the PUAs to also be developed.

o) Policy 46 (Parking Levies) and Policy 47 (Car Parking Standards)

The City values the flexibility of being able to work at a sub-regional level to tackle congestion, but considers appropriate transport policy context needs to be applied at the regional level to secure progress, and in particular welcomes

- iii) the retention of Policy 46 which encourages all transport authorities to examine workplace parking levies.
- iv) the recognition of the importance of maximum parking standards

p) Policy 55 – Regional Priorities for Air Transport

The Plan encourages the improvement of public transport links to East Midlands Airport (EMA) and for the development of the Airport within its own boundaries for passenger and freight movements. Other (economic) development associated with EMA is to be located within or on the edge of surrounding urban areas. These aspects are strongly supported. Also to be welcomed is the policy framework for development at or associated with EMA as this will assist in strengthening and widening the economic base.

q) Three Cities SRS 2 - Green Belt Areas

The pragmatic approach to the future of the Green Belt is welcomed and support given to the principle of retaining the Green Belt.