

# report

meeting:	<b>JOINT COMMITTEE ON STRATEGIC PLANNING AND TRANSPORT</b>	
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## **CONSULTATION ON THE SUBMISSION DRAFT OF THE EAST MIDLANDS REGIONAL PLAN REVIEW (EAST MIDLANDS REGIONAL SPATIAL STRATEGY RSS 8)**

### Purpose of Report

To inform the Committee of the stage reached in the preparation of the Regional Plan, how comments will be made and future stages in the Plan-making process.

### **Introduction**

1. The East Midlands Regional Assembly [EMRA] has submitted to the Government the draft East Midlands Regional Plan Review – technically the Regional Spatial Strategy [RSS] – which when finally approved by the Secretary of State will replace the current RSS 8.
2. The Plan was submitted on 28<sup>th</sup> September 2006 and the period in which formal representations can be made on the document finishes on 20<sup>th</sup> December 2006. The Plan covers the period 2001-26 and has various sections including a main section and sections on four Sub-regional Strategies [SRS] two of which cover the entire geographic County – the Three Cities SRS and the Northern SRS.
3. A number of background papers have been prepared and published with the Plan. A list of these papers is appended. The list includes a paper concerning the strategic review of the Nottingham/Derby Green Belt.
4. Earlier stages in the preparation of the Regional Plan were reported to this Committee most notably the Options for Change document which was considered at the October 2005 meeting. A series of stakeholders meetings have been held, those for the Sub-Regional Strategies being organised by the “Section 4 (4) Authorities” (the County Councils and Unitary Authorities).
5. As the Plan has been made public only relatively recently, it is not intended to take full representations through this Committee but to provide an overview of those parts of the Plan that affect the South Nottinghamshire area.

### **The RSS**

6. The RSS is divided into a number of parts. Part 1 is the Regional Strategy covering the whole of the East Midlands and sets out a core strategy, a spatial strategy and topic based policies and priorities on housing, economy and

regeneration, natural and cultural resources, the regional transport strategy and on implementation, monitoring and review. Part 2 sets out Sub-regional Strategies for Northamptonshire, the Three Cities Sub-area, the Northern Sub-Area and the Lincoln Policy area. The whole of the geographic County is covered by the middle two SRSs in the list above and the South Nottinghamshire area, apart from the small area within Newark & Sherwood district, is covered by the Three Cities SRS. Hucknall is considered to be part of this SRS though District wide figures for Ashfield are also given in the Northern SRS.

7. A copy of the Regional Plan [RSS] is available for inspection at the offices of both Councils.
8. The Plan includes the national planning policy advice to concentrate new development within and adjoining the main urban area (the sequential approach) and the overarching requirement to promote sustainable development.
9. On housing, the Plan subdivides the region into a number of Housing Market Areas [HMAs] which are groupings of whole District Council/Unitary Authority areas. The City, Broxtowe Borough, Gedling Borough and Rushcliffe Borough, with Erewash Borough, form the 'Nottingham Core HMA'; Ashfield, Mansfield and Newark & Sherwood Districts for the 'Outer Nottingham HMA'. Several HMAs make up the Three Cities SRS and two HMAs make up the Northern SRS. The position of Hucknall is that it is considered for spatial planning policy purposes as being in the Three Cities SRS but is part of the Northern SRS for statistical purposes.
10. The Plan uses the Government's 2003 Household Projections to assist in the production of housing requirements and considers a number of factors to arrive at a housing requirement set out for Sub-Areas and District Councils/Unitary Authorities. The consideration of actual numbers follows in the SRS section.
11. In contrast there are no employment land provision requirements either by Sub-Area or by District Council/Unitary Authority in the Plan but there are broad policies for regeneration and for regional priorities for employment land.
12. The Plan has undertaken a strategic review of the Nottingham/Derby Green Belt, a task that was required by the Secretary of State when the previous RSS was approved in January 2005. This Review started with the premise that the principle for the Green Belt had been established and concentrated on the consideration of adding or removing land against the functions of Green Belt set out in national planning guidance, and taking into account development requirements. The papers making up the review have been placed on the Regional Plan website by EMRA and were prepared by officers working for the relevant Section 4(4) Authorities on the understanding that the views expressed were not those of the Authorities themselves. In the South Nottinghamshire area, the Green Belt review protects the most sensitive areas of Green Belt particularly in the Broxtowe Borough area and was a factor in the general location policies for housing development in the Nottingham Core HMA – see paragraph below.
13. Turning to the SRS for the Three Cities Sub-area, and in particular on the South Nottinghamshire part, the housing requirements for the Nottingham Core HMA

are for 2,370 dwellings p.a. over the Plan period. This figure is around 300 dwellings p.a. above the national trend figure and considerably above (around 500 dwellings p.a.) that in the current RSS 9 which underpinned the housing provisions in the Joint Structure Plan. In terms of distribution within the HMA, Nottingham has 945 dwelling p.a., Broxtowe 270, Gedling 310 and Rushcliffe 555, the balance being made up by Erewash (290).

14. The Plan explains that the housing provision figures take into account the various Local Authority bids under the Government's New Growth Point initiative. The Government announced this initiative at the end of last year following publication of the Barker Review of Housing Supply and the document 'Homes for All'. Essentially, Local Authorities were invited to bid for large scale and sustainable growth at least 20% over and above the then set (statutory) levels of housing requirements by March 2006, and to encourage such bids the Government made available a sum of £40 million for a first round of infrastructure projects for the bid areas. Various bids were made in the East Midlands all which were taken into account by EMRA in preparing the housing figures in the Regional Plan and this includes a bid for the Three Cities area which was approved by both the City and County Councils. The Government intend to make a decision on which bids have been successful in the very near future.
15. There is a need for infrastructure provision to meet the housing requirements for the Nottingham Core HMA and two main aspects are set out in the Plan; the first is for transport/highways measures under advice from the Highways Agency, and the second requires further work by the Environment Agency on flood risk in the area between Derby and Nottingham.
16. The detailed housing provision in the Nottingham Core HMA states that a further 120 dwellings p.a. will be provided at Hucknall making a HMA total of 2,490 of which 1,840 should be within or adjoining the Nottingham Principal Urban Area (the area of South Nottinghamshire within the inner boundary of the current Green Belt plus Clifton). The SRS states that there may urban extensions in Broxtowe, Gedling and Rushcliffe Boroughs as necessary, but for Rushcliffe, the policy states that there will be a sustainable major urban extension to the south of Clifton.
17. The transport priorities for the area include improving transport links between the three cities and to the Nottingham East Midlands Airport (NEMA). The SRS states that "urban concentration and growth policies will require substantial transport investment through New Growth Point funding and mention is also made of the Transport Innovation Fund Bid by the City and County Councils.
18. The Plan encourages the improvement of public transport links to NEMA and for the development of the Airport within its own boundaries for passenger and freight movements. Other (economic) development associated with NEMA should be located within or on the edge of surrounding urban areas.

### **Commentary**

19. The above sets out a very brief summary of the relevant points raised in the Plan and concentrates on the factors affecting South Nottinghamshire. Officers of the two Councils have provided inputs to the Plan, and in particular to the SRS

sections on the understanding that the views expressed are not those of the Councils.

20. The housing requirements in the Plan take into account considerations of economic activity forecasts but no employment land requirement figures are as yet included. It is understood that these will become available and be made the subject of further public consultation in due course and be taken into account at the Regional Examination in mid 2007. It is a matter of some concern that the employment land figures are not available for several reasons set out below.
21. The figures would provide a comprehensive view to be taken of the overall scale and distribution of housing requirements. Whilst the overall housing figures are justifiable, the evidence base for them is not complete.
22. The housing figures take into account the Growth Point Bids but the Government has yet to announce the winning bids. If certain bids are not successful, this may require a revision of housing requirements in the RSS.
23. The lack of employment land provision figures affects the strategic Green Belt review as at present there is little hard data to know whether green field land is required for this purpose. In the context of South Nottinghamshire, such land is likely to be in the Green Belt. It may be that certain urban housing extensions are also suitable for employment land release and if so this would on balance make such extensions more sustainable.
24. The SRS is very detailed, far more detailed than the Joint Structure Plan with regard to the proportion of development to be within or on the edge of the Principal Urban Area and in the case of Rushcliffe the specification of a general location to the south of Clifton. There will be a need for a clear evidence base for the detail of the SRS and in the case of Clifton, such a location can only be made sustainable by major (public) transport infrastructure provision e.g. NET, A453 Improvements etc.
25. Whilst Hucknall is treated for strategy purposes as being within the 3 Cities SRS, the overall housing provision totals are to be found in the Northern SRS as the HMA totals are aggregates of whole Districts. The inclusion of Hucknall in the 3 Cities SRS is accepted but the Regional Plan as worded is not sufficiently clear on this matter and is likely to cause much confusion and should be rectified.
26. The need for infrastructure provision in general set out in the Plan is welcomed and will be essential for the achievement of sustainable development and in particular sustainable transport solutions. It is essential that necessary infrastructure projects are put in place in timely fashion in order that the development proposed in the Plan can be implemented with proper regard to the principles of sustainable development. There is also a perceived lack of detail concerning standards for energy efficient forms of development in the Regional Plan.
27. Also to be welcomed is the policy framework for development at or associated with NEMA as this will assist in strengthening and widening the economic base.

28. The reports to the two Councils will set out the representations on the Plan in more detail.

### **Future Steps**

29. The comments on the Plan will be sent to the Government Office for the East Midlands who now take control of the later phases of the preparation of the Plan. A Regional Examination before an independent Panel will be held in May/June 2007 at which the two Councils are likely to be invited to attend for selected issues. The Panel Report is likely to be made public at the beginning of 2008. Following a period of consultation on Proposed Modifications to the Plan, the Secretary of State is likely to approve the Plan at the end of 2008 or beginning of 2009.

### **RECOMMENDATION**

30. It is RECOMMENDED that

- a) the report is accepted;
- b) concerns are raised regarding the following matters as set out in the report – the lack of treatment of employment land provision, the lack of clarity in the Regional Plan regarding the treatment of Hucknall, the need for infrastructure requirements to make urban extensions such as that proposed south of Clifton acceptable, and the lack of appropriate detail on energy efficient forms of development; and
- c) the relevant executive bodies of both Councils be informed of these concerns when considering making representations on the Regional Plan.

### Background papers

No background papers

### Contact Officers

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