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29<sup>th</sup> March 2006  
By email.

Dear Ms Howard

### **Barker Review of Land Use Planning**

The East Midlands Development Agency is pleased to respond to the invitation to submit views and evidence as part of the initial stage of the Barker Review of Land Use Planning. Please find attached our responses to the questions set out in the Call for Evidence. Please note that we consider this to be an informal submission which we hope helps inform the further development and scope of this review. We look forward to having further involvement in this work, and will ensure our Executive Team and Board are involved in providing more formal input at the next stages of the Barker review.

The East Midlands Development Agency (*emda*) is engaged in land use planning in a range of different ways ranging from regional policy making to our role as a statutory consultee for planning applications to acting as a developer in our own right. Our points of contact with land use planning are therefore quite diverse and we believe this gives us a useful insight from a range of perspectives.

As we elaborate in our comments below, we believe that the reforms to the planning system have resulted in some significant improvements to the way in which land use planning operates. There is clearly an argument for more time to allow the system to "bed down" prior to the introduction of any further major reforms. However, as our comments make clear, there are a range of policy and procedural issues within the present land use planning system which are far from optimal and which if addressed could potentially help facilitate economic growth and prosperity.

I hope you find these comments useful, and look forward to having ongoing involvement in this study.

**Yours sincerely**

**Anthony Payne**  
**Director of Spatial and Sustainable Development**

## **Barker Review of the Land Use Planning System**

- 1. Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?**

An appropriate supply of quality development land is considered one of the fundamental requirements of a competitive regional economy, and a key element of the region's ability to provide the type and quality of development required to attract and retain employers and a quality workforce.

The East Midlands is a polycentric region with several urban areas serving as the principal focus of economic development. This spatial pattern provides opportunities for economic growth as a result of agglomeration benefits and developing on sectoral strengths and specialisms, but also opportunities for urban regeneration and renewal through development. In addition, the region is relatively rural overall which provides quite different issues and challenges around accessibility, and development land to help sustain smaller communities. The region is characterised in broad terms by the south of the region experiencing housing and development pressure due to the growth of the neighbouring south east region, and the north experiencing economic restructuring and pockets of relatively low demand and deprivation.

This diverse nature means that the planning system needs to be flexible and responsive to changes inside and outside of the Region. The planning system is a key part of the region's ability to respond to and provide for the differing needs and priorities across the region. The quality of the region's environment is an important element of its attractiveness to investment and in retaining and attracting people to live and work here. The planning system has a key role to play in providing the framework which enables economic growth and development while maintaining and improving the quality of the region's environment.

Given some of the issues listed in the question, the ability for the planning system to be responsive and proactive, and genuinely strategic, is key. A perceived lack of speed and responsiveness remain important criticisms made of a system which can sometimes take years to produce regional and local strategies, or to make decisions on major projects. These delays are not helpful in supporting regional efforts to ensure sensible and integrated development and investment decisions on land-use and other related issues.

An important issue inherent in the question above is an assumption that it is easy to reach a consensus on what 'the right development' is, and where it should go. It is the key role local and regional planning has in balancing competing demand and expectations that can cause it to be seen as unduly slow. Possible policy measures would include clear guidance from the centre to provide as much certainty as is practical on key planning issues. For example, addressing the lack of up to date guidance on Employment Land or Economic Development (PPG4) would be a useful policy measure to help provide the context for local and regional policy and approaches.

Encouraging joint working between local authorities has an important role to play. For example, the identification of Housing Market Areas in the East Midlands is leading to closer working across local authority boundaries. The HMA approach requires local authorities to look beyond their own area boundaries at housing market areas. The approach in the East Midlands was to identify ten HMAs comprising a number of whole District Council areas. The HMAs will be used as the basis for the identification of

priorities including affordable housing requirements, and should help improve the role of the planning process in helping meet local and strategic needs.

emda made a recent response to the ongoing Eddington Study of Transport and Productivity which emphasised the importance of improving transport accessibility and connectivity as one of the main priorities in terms of continued sustainable growth and improved productivity of the regional and national economy. We were keen to emphasise and promote transport schemes which will make a significant difference to economic development and patterns of land-use. Integrating land-use and transport schemes and investment is an important part of how the planning system benefits the region and its communities. For example, a new motorway (M1) junction to access a major employment site at Markham Vale in Nottinghamshire, and the completed Mansfield Ashfield Regeneration Route (MARR) road which has helped open up many new employment sites. By addressing the barrier of poor accessibility, these schemes are helping create new employment opportunities, and provide improved economic conditions and stability for significant communities in the region. Similarly, in the South of the region, emda has been working hard with partners to explore the potential for reconnecting Corby to the mainline rail network to help deliver regeneration and growth within the context of the MKSM growth area.

Our comments to Eddington also drew attention to the role of Nottingham East Midlands Airport (NEMA) as the UK's largest Express Freight hub and UK's leading pure freight airport. It plays a key role in providing access to international markets across the globe, and in improving UK and regional competitiveness. Recent work undertaken for emda and NEMA by Oxford Economic Forecasting, helps show the importance of the Express Freight sector to UK businesses, and illustrates the importance of the sector in its own right. Ensuring that sites are available in locations accessible to the Airport is key to capturing the economic benefits and potential they can bring. The emphasis from the RES and RSS (and Airport Economic Development Strategy) is on securing land supply in neighbouring urban areas close to labour supply.

In the East Midlands, regional partners are developing a Land Use and Transport Interaction model to help inform future land-use and transport plans and investments in and around the Sub Region which includes the Nottingham East Midlands Airport. This work will help better understand and plan for the relationship between land-use decisions and transport demand. There is a case to be made for more sophisticated approaches being taken to meet the challenges faced by transport and land use, and to ensure that congestion and other barriers do not constrain sustainable economic growth and development.

- 2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?**

The new planning system represents a major step change in the establishment of a positive and more pro-active planning system. A complete coverage of land use plans and a more joined-up approach should be achieved, which has been lacking to date. A key issue to be overcome is that of ensuring more reliable and efficient operation of the system as a whole without reducing its robustness or thoroughness.

*Community Involvement*

Local authorities are required to map out the coverage of local plans, and the extent and content of community involvement. These are all very positive steps forward, the benefits of which should not be underestimated. As we are in the midst of a period of considerable change the full benefits of the new system may not yet have come to the fore but there are signs of positive progress in accordance with the objectives set in national planning guidance.

There are positive signs that local authorities have enhanced their community consultation processes, particularly those communities that are residentially based. The political composition of local authorities inevitably means that they take an area based approach. What is less certain is whether they have enabled fuller participation from other stakeholders, particularly the very diverse business community in a meaningful way in the plan making process. Measures to better engage the business sectors would be welcome, although there is clearly a balance between being inclusive and becoming more cumbersome or unwieldy.

#### *Knowledge of Wider Issues*

There is undoubtedly greater “flexibility” in the new planning system. Within the parameters set by PPS12 local authorities are able to concentrate the development of policy on the major areas of change. However, fundamental problems remain as a result of cultural, institutional and political issues. First of all, local authorities are now often very focussed on the process of plan making which may limit their ability to reflect on whether they are sufficiently addressing more fundamental issues, such as globalisation and climate change. Secondly, local authorities do not necessarily have the expertise to allow them to consider issues such as this. Central Government guidance and advice is key to how local authorities will tackle a range of issues and it needs to be comprehensive in coverage. A current major weakness is the out of date guidance to Local Authorities (and regional planning bodies) on promoting economic development and business development. A review and update of PPG4 (1992) would be a major step forward in this regard, and the RDAs are currently considering issues relating to this.

On issues of strategic infrastructure projects, or major strategic sites, it would be useful if local authorities were provided with clearer guidance from central Government, and/or regional bodies. Slow decision-making on major projects can deter both public and private investment, and is considered a barrier to our competitiveness and ability to respond to wider opportunities and challenges. One potential approach for consideration might be for RES and RSS to provide clearer specific views on key sites or infrastructure projects within the context of national or inter-regional priorities to help expedite local decision-making.

#### *Joined-up Approaches*

There remain relatively few instances where Joint Local Development Frameworks are being developed. In the East Midlands there is one notable example which is the North Northamptonshire Joint Planning Unit (JPU) which comprises planning officers from the local authorities of Wellingborough, Corby and East Northamptonshire Councils together with Northamptonshire County Council. The JPU is co-ordinating the preparation of a Joint Local Development Framework for North Northamptonshire and is directly producing the Joint LDF Core Strategy. The formal decision making body of the JPU is the statutorily constituted North Northamptonshire Joint Committee. Established in July 2005 the Joint Committee is made up of 3 elected members from each planning authority, including Northamptonshire County Council. It will be responsible for agreeing the Joint Core Strategy and other work, but has no development control powers.

The East Midlands Regional Spatial Strategy (<http://www.emra.gov.uk/regionalplan/index.htm>) is adopting a Sub Area approach

whereby Sub Area Strategies will be worked up for Northamptonshire, Greater Lincoln, The Three Cities Sub Area comprising Derby, Leicester and Nottingham and the Northern Sub Area. Sub Area Strategy development groups are working together to identify sub-area issues and to develop appropriate planning policy responses. These groups are being led by the County Councils of Northamptonshire, Lincolnshire, Derbyshire and Nottinghamshire. emda participates in the meetings of these groups and actively encourages involvement from its Sub Regional Strategic Partnerships.

In the East Midlands there is a single representative of the Core City Network - Nottingham. However, the spatial structure of the East Midlands is polycentric meaning there is no single dominant city – the Principal Urban Areas are Derby, Leicester, Nottingham, Lincoln and Northampton. The way in which the RSS Sub Regional Strategy work is taking place reflects these spatial relationships. Of particular note is the increasing emphasis being given to complementary joint working amongst Derby, Leicester and Nottingham as The Three Cities Sub Region. Evidence of collaborative joint working includes an anticipated bid seeking Growth Point Status.

**3. Sustainable development is the core principle underpinning planning. Does the current planning system achieve the right balance between economic and other goals, such as regeneration, social cohesion, improving the quality of design and the protection and enhancement of the natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?**

The planning system has a key role to play in helping balance the competing demands on land, and the range of different regional objectives. Achieving sustainable patterns and types of development is a goal shared by many regional and local partners and stakeholders, including the RDAs who do not have a direct statutory spatial policy function.

In simple terms, in order to help deliver sustainable patterns of development the planning system has a key role to ensure appropriate supply of land for development – both brownfield and greenfield – and to integrate land-use with other wider objectives. The brownfield housing agenda is an important element of working to achieve sustainable patterns of development through making best use of land, and reducing the need to travel. But where this reduces the supply of employment land, forcing existing and new employment uses to peripheral locations, this can perversely lead to less sustainable patterns of development. There are already signs from regional monitoring that over recent years in the East Midlands more employment sites have been greenfield than brownfield. While greenfield locations are often very attractive to employers and developers, there is potential for the focus on brownfield housing to prevent an appropriate mix of uses and development types on brownfield sites. Also, while increased density in urban areas helps contribute to the efficient use of land, it creates a tendency for urban housing developments to be largely limited to flats or apartments, which may not fully achieve mixed or ‘sustainable’ communities. It is therefore important that the planning system, and those charged with developing policy, are not closed off to longer-term and strategic solutions to helping provide longer-term sustainable patterns of development which may not only relate to brownfield housing land and a focus on large urban areas.

The RES is being reviewed at present, and an increasing emphasis is being placed on securing the right balance between economic growth and the importance of a quality environment as part of the regional infrastructure and ‘offer’. The emerging RES ‘A Flourishing Region’ (due to be launched in July 2006) makes reference to protecting and enhancing Green Infrastructure, making the links between a healthy and robust green

infrastructure and a truly successful economy. A priority action will be to protect and enhance local green infrastructure to contribute to more sustainable communities and enhance quality of life.

**4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?**

This is an interesting issue, although there is limited knowledge and experience within the Agency of planning systems in other EU member states.

It would be useful for the Barker Review to refer to lessons learnt from other countries that have developed planning policy and consent systems which operate at a faster pace than that in the UK, and whether shorter lead-in and decision-making processes creates more flexible and responsive systems, or where there is more specific strategic guidance regarding infrastructure or major sites from the national perspective.

**5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?**

Anecdotal evidence suggests that many businesses interests still find the planning world “impenetrable”. This is particularly the case for many small and medium sized businesses. Without access to professional planning expertise it can be very difficult to keep track of policy development and then to have the means of inputting views.

RDAs are often expected to represent “business interests” in the Region and while we are involved in networks of business organisations, representing or capturing very diverse views of ‘business’ is not straight-forward. emda has a strong working relationship with the East Midlands Business Forum and the Federation of Small Business Services, but ‘the business community’ is not a homogenous group. Greater efforts by planning bodies to directly seek input from the private sector would be a positive step.

While we try to work with the business community on a range of policy and operational issues, it has not always been straight forward to canvass their views on planning issues. However, a strong message we often receive is that planning can be a major barrier or brake on development and growth. Articulating the reasons for this and potential solutions, is arguably a challenge/ task in which the RDAs have to play a role.

East Midlands Planning Aid has played a key part in the RSS consultation process by making the process accessible to local businesses and the general public. This is a positive example of where local businesses are been encouraged to engage in the planning process.

**6. Is the planning system sufficiently “joined-up” with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?**

The East Midlands RES is currently being reviewed. This operates within the context of the Integrated Regional Strategy which is prepared by the East Midlands Regional

Assembly. It is also in alignment with the Regional Spatial Strategy, which is also under review at the present time. Consequently, we are keen to ensure that our activities are alignment with the regional land use plan, and that the RES helps influence and inform the RSS.

In the East Midlands the RES and the RSS are being prepared in parallel, although timescales for review are very different. Officers from emda take part in policy development task groups for the preparation of the RSS and the Regional Transport Strategy. The Agency is therefore able to feed in views during the development of policy. Both EMRA and emda recently commented on each others strategies during formal periods of consultation. When commenting on the most recent stage of the RSS review emda emphasised in particular the need to have regard to balanced development and a planned approach to housing, employment and infrastructure.

Emda is also represented at Board level on the East Midlands Regional Housing, Planning and Transport Joint Board. The Joint Board works within delegated powers agreed by the full Regional Assembly and meets 4-6 times a year. The Board comprises 22 Members – of which 15 are local authority Councillors nominated by the East Midlands Regional Local Government Association and 7 representatives from social and economic partners, including a representative from *emda*.

It is recognised that alignment of the two strategies is fundamental. A key area of joint working is the Job Growth Forecasts which will inform both strategies. Emda is leading on this piece of work using an Economic Forecasting Model developed by Experian, and will make available job growth forecasts to the East Midlands Regional Assembly to inform the RSS. The next set of data will be the 'policy on' job growth forecasts which take account of the effect of the added value provided by the RES.

The East Midlands Regional Assembly, emda and other stakeholders such as the transport authorities recently concluded a piece of work to determine regional funding priorities which helped to inform the Government on transport priorities in the Region. This was a challenging exercise but was conducted effectively through effective joint working (assisted by the involvement of external consultants).

The Agency employed Roger Tym and Partners to help inform the employment land priorities of the RSS and also to help inform the Evidence Base of the RES. The intention of this piece of work was to help to align employment land priorities of local authorities with the sectoral support priorities of the RES, so that those businesses in key sectors have the space to locate, thrive and expand in the East Midlands. ... It focuses on the need to improve the regional offer of sites and buildings so as to promote opportunities for employment growth and business development..

- 7. Planning applications for major projects will typically take a considerable time to work through all the necessary stages. Do you consider that the planning application determination process puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?**

We note the views in the Audit Commission's recent report on the Planning System 'The Planning System. Matching Expectations and Reality' (2006) which found that the Government's focus on speed, particularly in relation to major planning applications was having negative effects on the quality of services in some Councils. As a result the Commission recommended amending the performance indicator relating to processing

major applications so that it measures compliance with planning delivery agreements (where these exist) rather than monitoring performance against the 13-week target.

The Audit Commission acknowledged that targets on speed were important in improving standards of service, but where Councils had effective pre-application agreements in place the Government should look at changing the basis for measuring council performance. In addition, the Audit Commission recommended that Government action was required to ensure that planning applications which have gone beyond their target date were not neglected.

emda agrees that the issue raised above is of relevance, but believe that reliability and quality are arguably more important than pure speed alone. There is clearly a major challenge to ensure criticisms that the system is too slow and unresponsive are met without compromising quality and thoroughness.

**8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?**

We have no evidence to suggest that the costs of making a planning application deter investment. However, the burden on small businesses and SMEs may be significant.

Since June 2004 emda has been a statutory consultee for planning applications of regional and sub regional economic significance. To date, over 170 responses have been made to planning applications which have met the Agency's Notification Criteria. Emda welcomes the increasing emphasis given to pre application discussions as a way of clarifying issues between the applicant and the local planning authority at an early stage in the process. The applicant benefits from knowing what the local planning authority considers to be the key issues that will need to be addressed and can make provision within a project plan as to the range of actions that will be needed prior to formal submission. On the other hand the local planning authority can begin internal (and external) consultations so that all key players who will be involved in the consideration of the application are alerted and able to provide early informal advice. Pre application discussions are not a desirable 'add on', but should be seen as standard practice for most types of development activity, particularly larger schemes.

**9. To what extent are high occupation costs in England likely to be due to planning constraints (or due to other factors such as imperfect competition or lack of transparency in the land market)? What is the economic impact of these costs in terms of the main drivers of productivity?**

Occupation costs may be high due to land availability, and while the planning system is not the only factor, there is clearly a relationship between them. The economic impacts of these costs are that in the absence of affordable or appropriate sites, businesses often seek relocation to more affordable locations, which are often edge-of-town or business parks. This trend can undermine the goal of city centre regeneration, and have negative impacts on the patterns of development. It can also undermine the potential for developing agglomeration benefits, or important clustering of related activity. In addition to supply issues, the significant difference in site values for different uses can easily result in imbalanced development patterns in urban areas. For example, the consistent loss of employment sites to residential development is beginning to cause real concern in many urban areas.

**10 How does the planning system impact on competition, through influencing barriers to entry and exit and economies or scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?**

Land use planning assists in indicating the type, amount and location of new development, subsequently having an impact on where economic growth and competition occurs. It therefore can and does play a role in terms of impacting on competition. However, decisions should be taken based on land-use considerations rather than who the application is submitted by or who owns the land, and so the direct or explicit impact should be limited.

**11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?**

A series of studies have recently taken place across the region to assess demand and provision of employment land. For example, a study by the BE Group for the City of Leicester (2005) found that the City's continued economic growth was at risk from a lack of immediately available employment land and a lack of modern premises. Furthermore, there has been substantial market failure in the provision of sites and premises in the past, and a significant proportion of existing employment land has been, and is continuing to be, lost to housing. The study identified that there was likely to be a shortfall of around 60 hectares of employment land required by 2016.

Emda recently undertook a cluster review which will feed into the review of the RES, and help influence our engagement with issues relating to land supply, type and quality. Up to date guidance from Government in relation to economic development is an essential element of ensuring the planning system realises and implements its key role in working to deliver regional and local economic aspirations and objectives.

**12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?**

Staffing and resources at the local level are issues which impact directly on performance and on the ability of the planning system to respond quickly and effectively to new challenges and issues, as well as meeting its statutory requirements. In our experience there is a lot of quality experience and knowledge contained in the Planning Authorities, but there is often inadequate capacity to allow Local Authorities to fully take things forward or engage in all the relevant activities. This relates to wider concerns and issues about a shortage of qualified planners, and of new people entering the profession.

Joint working to help provide shared evidence can reduce this burden, and is an approach often taken to help both remove the need for duplication by several local authorities, but also to help provide the basis for a consistent approach within the region. Regional partners have a role to play in helping inform and support local action, and both emda and the Assembly are active in this way. But ultimately, adequate funding and staffing is essential to ensure that Local Authorities are able to take and proactive approach to the relevant local issues and areas, as well as participate in work relating to wider issues as appropriate. Given the increasing role of the planning system in helping implement the Government's objectives around sustainable development, and the increasing complexities of the issues this raises, it is important that salaries and training keep pace

with the demands made on planning and related professions, and that academic planning courses reflect the new role and scope of the planning system.

**13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?**

emda helps to facilitate the East Midlands Business Forum which is a grouping of key business representatives across the East Midlands including the East Midlands Chambers of Commerce, the Federation of Small Businesses, the Institute of Directors, the CBI and the Engineering Employers Federation. Although the Forum does not focus on planning issues per se, it does provide an opportunity for the discussion of planning issues which can then be fed into other consultation processes, for example there was policy debate at a recent meeting which followed on from a presentation on the East Midlands Regional Spatial Strategy and led to a joint response on behalf of the Forum on relevant planning issues.

Chief Executives of the RDAs will be meeting with British Chamber of Commerce representatives on 6<sup>th</sup> April 2006 when the issue of business involvement in planning will be discussed.

emda is keen to encourage greater business involvement in planning, but is cognisant of the range of planning issues which businesses may have a view on, from local issues regarding planning applications to wider strategic concerns about transport, congestion, connectivity and regional competitiveness. The diversity of the "business sector" is also an important consideration. Generally speaking large businesses are able to navigate their way through the planning system because they are able to employ specialist advice which the small business sector is less likely to access.

**14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?**

If the planning system from national to local level provides clear and consistent guidance and a framework for action and decision-making, local decisions should be capable of achieving the required balance.

emda recently commented on the Planning Gain Supplement (PGS) consultation. We are supportive of the broad principle underlying the concept of the proposed PGS and can see potential benefits from an approach which captures a portion of the gain arising from the granting of planning permission for reinvestment in required infrastructure to serve the development and wider community. However, we feel there are a number of important issues that need to be given careful consideration when taking forward the development of the PGS. In our view, the ultimate test of the PGS proposals would be whether it would raise sufficient revenue to fund necessary infrastructure to meet agreed local, regional and national priorities without unduly distorting the development process. Any PGS or similar initiative should not deter or slow down the planning system, but should act to improve transparency and predictability, and to improve and better coordinate the funding of vital infrastructure. However, the establishment of an effective system without distorting the development process and deterring development will inevitably be challenging.

**15. Economic development can help to achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?**

As referred in relation to earlier questions, the absence of up to date national guidance on economic development is a major barrier to how well the planning system strikes the balance between economic development and other competing land uses. Also, more direct national level guidance relating to major infrastructure could be an important step to help provide more certainty and strategic guidance to regional and local partners.

There are a number of key challenges and opportunities facing the Region which should be addressed through the planning system including growth in the south of the Region caused by 'over-heating' of the South East. The housing development associated with the MKSM growth area requires careful planning, and a policy framework to ensure that infrastructure and employment development are provided to develop balanced growth. Northampton is shown by the RES Evidence Base to be a major location of growth and ensuring the MKSM growth sees appropriate quality employment land and economic development opportunities will be key. A range of delivery vehicles and partners are working hard on securing an appropriate balance.

emda has been working with English Partnerships to develop a pilot Brownfield Action Plan for the East Midlands. The pilot was carried out in the Derby and South Derbyshire local authority areas and will be rolled out across the Region. The Pilot has involved engagement with local authorities and key stakeholders in identifying priority brownfield sites which could be bought forward, with limited planning constraint, for economic use.

In terms of the impacts and experiences of rural areas, there are concerns that the planning system can restrict growth both of housing and economic development. The sequential approach where applied without due regard to the needs of all communities and with a focus only on large urban areas can have significant impacts on smaller or rural communities. Without careful application, it is easy for planning policies and decisions to reinforce the relative isolation or viability of some rural communities, by focusing development only on larger market towns or cities. Appropriate development in smaller communities can make a significant impact on their ability to retain population, and to maintain some economic and social self-sufficiency.