EAST MIDLANDS REGIONAL PLAN

Report of the Panel
Examination in Public
[22 May – 19 July 2007]

November 2007
## CONTENTS

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Page Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Introduction</td>
<td>5</td>
</tr>
<tr>
<td>2</td>
<td>Sustainability and Climate Change</td>
<td>13</td>
</tr>
<tr>
<td>3</td>
<td>Spatial Strategy</td>
<td>23</td>
</tr>
<tr>
<td>4</td>
<td>Housing</td>
<td>31</td>
</tr>
<tr>
<td>5</td>
<td>Economic Strategy</td>
<td>57</td>
</tr>
<tr>
<td>6</td>
<td>Tourism</td>
<td>71</td>
</tr>
<tr>
<td>7</td>
<td>Natural and Cultural Heritage</td>
<td>75</td>
</tr>
<tr>
<td>8</td>
<td>Water Management</td>
<td>81</td>
</tr>
<tr>
<td>9</td>
<td>Minerals</td>
<td>87</td>
</tr>
<tr>
<td>10</td>
<td>Waste Management</td>
<td>93</td>
</tr>
<tr>
<td>11</td>
<td>Energy</td>
<td>101</td>
</tr>
<tr>
<td>12</td>
<td>Regional Transport Strategy</td>
<td>109</td>
</tr>
<tr>
<td>13</td>
<td>Milton Keynes and South Midlands Sub-Regional Strategy</td>
<td>125</td>
</tr>
<tr>
<td>14</td>
<td>The Three Cities Sub-Regional Strategy</td>
<td>133</td>
</tr>
<tr>
<td>15</td>
<td>The Northern Sub-Regional Strategy</td>
<td>149</td>
</tr>
<tr>
<td>16</td>
<td>The Lincoln Policy Area Sub-Regional Strategy</td>
<td>157</td>
</tr>
<tr>
<td>17</td>
<td>Grantham and the Eastern Sub-Area (outside the Lincoln Policy Area)</td>
<td>165</td>
</tr>
<tr>
<td>18</td>
<td>The Peak Sub-Area</td>
<td>173</td>
</tr>
<tr>
<td>19</td>
<td>Monitoring, Implementation and Review</td>
<td>181</td>
</tr>
<tr>
<td>20</td>
<td>Future developments for the draft regional spatial strategy</td>
<td>187</td>
</tr>
</tbody>
</table>

**Annexes**

<table>
<thead>
<tr>
<th>Annex</th>
<th>Title</th>
<th>Page Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Schedule of Recommendations</td>
<td>191</td>
</tr>
<tr>
<td>2</td>
<td>Examination Timetable</td>
<td>211</td>
</tr>
<tr>
<td>3</td>
<td>List of matters considered and participants</td>
<td>213</td>
</tr>
<tr>
<td>4</td>
<td>List of core documents</td>
<td>239</td>
</tr>
</tbody>
</table>
Chapter 1: Introduction

The draft Regional Spatial Strategy; the scope and content of the plan; the style of the draft strategy; soundness – an overview; the appendices.

The draft Regional Spatial Strategy

1.1. The draft strategy was placed on deposit for consultation purposes from 28 September to 20 December 2006. As a result 1,291 responses were received from individuals, bodies and groups comprising over 8,000 separate statements of support, observation or objection.

1.2. Our Secretary looked at all the objections and representations received and we selected thirty main issues for examination, in consultation with the Regional Assembly and the Government Office for the East Midlands. We also consulted on the choice of participants at the examination. The draft list of matters and participants was published on 23 February 2007 for a 28 day consultation period; the comments received were placed in the examination library and the final list was published on 4 April 2007. In addition Matter 14 (Milton Keynes South Midlands) was published in draft on 4 April 2007 for a 28 day consultation period and the final version was published on 14 May 2007.

1.3. In total over three hundred participants were invited, with around one hundred and fifty taking up their invitations, including all the county and unitary authorities, almost all the district and borough councils and representatives of various town and parish councils.

1.4. The list of matters and participants is reproduced as Annex 3 to this report. All participants were given the opportunity to submit statements prior to the examination and these were circulated in advance to all those participating in the relevant sessions. Statements prepared by the Regional Assembly were likewise circulated. Written statements submitted by those who were invited but unable to attend and those to whom we were unable to issue an invitation have also been taken into account. A library was available both prior to and during the examination where copies of all statements and other relevant documents were available for inspection. A list of the core documents is at Annex 4.

1.5. Preliminary Meetings took place on 28 February and 11 April 2007. The purpose of these meetings was to explain the nature of the proceedings and allow us an opportunity to address any questions on how the examination would be run. In addition we held four technical seminars which were open to all participants and the public. The seminars were on: Housing (11 April 2007), Employment/ Economy and Transport Modelling (12 April 2007) and Flood Risk (24 May 2007).

1.6. The examination was held over a period of eight weeks, between 22 May and 8 June 2007 and 19 June and 19 July 2007; the examination sat for 165 hours. The examination was recorded and is available in MP3 format which can be downloaded for a small fee from www.venueservices.co.uk until 31 December 2007. The detailed timetable is at Annex 2.
1.7. Several days prior to the examination were spent touring the region, including visiting locations relevant to the matters being examined. Further visits took place during and after the examination.

1.8. For ease of understanding Annex 1 details all of our recommendations. This report does not necessarily deal with issues in the order that they arose in the public examination, nor in the order of the draft strategy. The aim has been to cover the ground in a logical and readable way.

1.9. We wish to thank all those who contributed orally and in writing. Our report of necessity has to concentrate on a limited amount of information but the many contributions greatly assisted us in our understanding of the issues. We are extremely grateful for the time and effort undertaken by all who were involved in the examination in public, whether as participants or interested observers.

1.10. Our Secretary was Mrs Pam Perceval-Maxwell whose firm and enthusiastic management of the examination proceedings was an example to all, and whose patience and perseverance well supported us, even at times when the volume of work threatened to overwhelm us all. Our Panel Assistant was Ms Lorraine Varney, whose support was likewise tireless throughout the run up to and during the examination. We were assisted also by Planning Officers from the Planning Inspectorate: Mr Chris White (Higher Planning Officer), Miss Liz Elford (Planning Officer) and Miss Judith Montford (Trainee Planning Officer). The last two combined their work for us with academic studies to further their careers, in which we wish them well. To all of these most valued colleagues go our most heartfelt thanks.

The scope and content of the plan

A partial review

1.11. The draft strategy is a partial review of the Regional Spatial Strategy. The current RSS8 was approved as recently as March 2005, and the strategy has been subject to three separate reviews since 1998. The Assembly has prepared the present draft on the basis that “where something is not broken, we have not attempted to fix it”\(^3\). As a result, the draft strategy follows the same basic structure and style as the current RSS8, although where necessary the content has been amended to reflect changing policy requirements and new information.

1.12. Strategy for Northamptonshire formed part of the Milton Keynes and South Midlands Sub-Regional Strategy which was approved in March 2005. It contained district housing figures for all local planning authorities with the exception of Northampton and its implementation area which were deleted following a High Court challenge. They have since been re-worked and have been brought forward as a partial revision of the draft regional strategy. In other respects the draft strategy takes in already approved material which was not before us to re-examine.

\(^3\) The Regional Assembly’s opening statement (quoting Henry Ford), Core document EXAM39.
The layout of the draft strategy

1.13. The draft strategy is divided into two parts: a Part 1 containing general policies and the like, and a Part 2 containing four “sub-regional” strategies. These sub-regional strategies do not, between them, cover the whole region, but are confined to three areas – Milton Keynes South Midlands, the Three Cities (Derby, Leicester and Nottingham) and Lincoln where urban growth needs particular guidance, and the Northern sub-region where there are particular problems of regeneration. Some confusion is caused by Part 1 also containing policy material tailored to the needs of what are known as “sub-areas” which, between them, do cover the whole region. This material is organised, not only on a geographical basis, but also topic by topic. We understand that Milton Keynes South Midlands Sub-Regional Strategy will form part of the adopted regional spatial strategy.

1.14. The distinction between sub-areas and sub-regions can be confusing for a first time reader. But while this distinction takes some getting used to, it is shared with the Regional Economic Strategy and we can see the logic of it. So we would not want it re-written on a possibly more conventional and comprehensive sub-regional basis for which we see no need.

1.15. Part of the confusion in the draft strategy for a first time reader arises from Part 1 and Part 2 having separate numbering series. It is a minor point, but we recommend [R1.1], if practicable, a continuous numbering series throughout the draft strategy, both of pages and paragraphs.

Variation in the level of detail

1.16. We could not help observing variation in the extent to which locational detail was provided in the draft strategy, particularly, but not only, in Part 2 of the draft strategy. In this Part, in the Lincoln Policy Area Sub-Regional Strategy, there appears a diagram showing the existing built-up area, proposed urban extensions, green wedges, railway lines and the general lines of the existing and proposed road network. Elsewhere in this part of the draft strategy are much less detailed diagrams. In the main, the level of detail in the text relates to the level of detail illustrated in these diagrams. Also in Part 1 of the draft strategy are occasional references to the location of proposed urban extensions. While these differences may be explained by variations in approach by the various s.4(4) authorities, this does not of course excuse them. Nor does the explanation that the differences reflect particular local circumstances seem wholly convincing.

1.17. The location of urban extensions and other matters of general urban structure was often a feature of structure plans and in this context provided useful coordination for local planning where an expanding core city was surrounded by different local planning authorities. While explicit guidance is lacking in national policy as to whether such material should be pushed up (as it were) to regional strategy or passed down to the local level we note that national policy both considers the spatial strategy for an

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4 See, for example, the pre-examination statement of Redrow Homes (Midlands) Ltd.
5 Given by Mr Andrew Pritchard on behalf of the Assembly.
area is a matter for local “core strategies”\textsuperscript{6} and also places emphasis on joint working by local authorities in the preparation of such strategies\textsuperscript{7}.

1.18. So we are firmly of the view that such matters as the location of urban extensions are for planning at the local level. We made it clear from the outset that our examination was the place neither for the hearing of representations concerning the future of land holdings of developers and others nor the relative merits of rival urban extensions.

1.19. For this reason we are recommending the excision of most of the locationally specific material from the draft strategy. These recommendations appear, as appropriate, in later chapters of this report.

1.20. The Lincoln Policy Area Sub-Regional Strategy is plainly at odds with this view on locational specificity. Nevertheless, it is there and in our view it performs a useful role in the interim period between the approval of regional strategy and the adoption of local planning materials. So we take the view that it so should stay (with our recommended modifications\textsuperscript{8}) in this revision only of the draft strategy.

1.21. In other respects, we have not attempted to impose uniformity throughout the strategy. The s.4(4) authorities took an active role in the preparation of the strategy (as in the examination) and so some variation of approach is only to be expected. Moreover, each of these authorities comes with a different tradition of structure planning. Having said this, we leave open the question of whether uniformity of approach throughout the region is indeed desirable.

\textbf{Is the sub-regional/sub-area material necessary?}

1.22. National policy guidance makes it clear that sub-regional issues may be addressed in regional spatial strategy where there is a clearly recognisable “strategic policy deficit”\textsuperscript{9} that cannot be addressed by the regional strategy or by local planning processes on their own. Both the “sub-regional” and “sub-area” material appear to us to fill such a deficit and so we are content with the inclusion of both in the draft strategy.

\textbf{The Lincolnshire Coast}

1.23. Although we considered the issues related to the risk of marine flooding on the Lincolnshire Coast at some length, we do not consider that the planning of the whole sub-area is so complex as to justify a separate sub-regional study\textsuperscript{10}.

\textbf{The style of the draft strategy}

1.24. Most of the points of style relate to the earlier part of the draft strategy and the definition of the appendices to Part 1.

\textbf{The Key Diagram}

1.25. Although there was criticism of the lack of detail on the Regional Key Diagram, if the special interests of every participant group were added to the Regional Key Diagram it would, in our opinion, become far too complicated. It should, however, show areas of change, such as the

\textsuperscript{6} PPS12, paragraph 9, Core document PP12a and the White Paper “Planning for a Sustainable Future” paragraph 8.44; Cm7120
\textsuperscript{7} PPS11 Regional Spatial Strategies, paragraph 1.13, Core document PP11.
\textsuperscript{8} See Chapter 16.
\textsuperscript{9} PPS11, paragraph 1.13, Core document PP11 and Regulation 4.
\textsuperscript{10} As urged by the Home Builders’ Federation, English Heritage and Natural England.
locations of towns selected as "Growth Points". To emphasise the importance of motorways and main railway lines to the strategic planning of the region, we recommend [R1.2] that these features should be added to the Regional Key Diagram, as in the approved RPG8. The Key Diagram rightly shows that the Peak District National Park extends into adjoining regions but unfortunately there is not such clarity over the boundary of the Peak Sub-area which needs to be remedied. We recommend [R1.3] that this be made clear.

Diagram 1

1.26. This diagram attempts to show the linkages between the East Midlands Region and its neighbouring regions. As it is, its form appears to be something between a spatial diagram and a set of tables. It is a useful piece of analysis, and its presentation is essentially a matter of practical draughtsmanship upon which we make no formal recommendation.

1.27. It may be that an outline of the East Midlands Region at the centre of the page, with arrows leading to the five boxes representing the adjoining regions, laid out (full size) as in the box below, could be devised.

Diagram 1: Inter-Regional Linkages & Relationships

1.28. If this is not practical, then the whole material should be re-worked as plain text.

Soundness — an overview

1.29 National policy, as set out in PPS11\(^{11}\), requires us to satisfy ourselves that the draft strategy is sound by reference to a list of 12 criteria\(^{12}\). Some of these criteria relate to the strategy as a whole (such as whether it has been subject to a satisfactory sustainability appraisal), whilst other criteria are more easily addressed on a topic by

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\(^{11}\) PPS11, paragraph 2.49, Core document PP11.

\(^{12}\) One of which, criterion (ii) invokes a list of a further 10 criteria, which to some extent overlap the 12 in paragraph 2.49.
topic basis (such as consistency with national policy). So we do not see that the general requirement of soundness can be addressed in a wholly absolute manner, that is, in terms of a determination that the draft strategy is or is not “sound”.

1.30 Moreover, we are mindful that local development frameworks, now in preparation all over the region, must be in conformity with approved regional spatial strategy. If we were to advise the Secretary of State that the draft was not sound, and were approval denied on that basis, there would, in our opinion, be a policy deficit that would severely limit progress in the local planning field. For that reason we see a duty to be as constructive as possible and we are, again wherever possible, recommending modifications that will enable the Secretary of State, as it were, to repair deficiencies in soundness. Alternatively in some policy areas, we are recommending an early review where lack of soundness cannot be readily repaired. As will be seen in later chapters, these areas are in the fields of housing numbers and their spatial distribution and of sustainable transport.

1.31 We do not repeat the 12 criteria here, nor do we intend to analyse the soundness of the draft strategy against each of them in turn. We do this where appropriate in the following chapters of this report in relation to the individual matters or topics dealt with in each chapter.

1.32 What of the criteria that relate to the policy as a whole? The draft strategy is undoubtedly a “spatial” plan taking into account a wide spectrum of economic and social matters, relating them to the different parts of the area as necessary. So far as we are able to tell, it is consistent with other strategies for the region, and is internally consistent as to its substance, although as we note earlier in this chapter there is considerable inconsistency in presentation and detail.

1.33 The draft strategy has been prepared according to all necessary statutory procedures and passed through all the required stages of community and partnership working. This is not to say, of course, that the draft can be taken as an agreed document, as our postbag of representations and the variety of views expressed at the examination demonstrated. The draft strategy has clear mechanisms for monitoring and implementation though, as will be seen from our Chapter 19, these are not without criticism. It would be good to think that a future review might begin by considering the results of monitoring the present strategy as a prelude to the devising of new policies and proposals.

1.34 The sustainability appraisal attracted little criticism, indeed it figured large from time to time in criticisms of the draft made by the environmental organisations. In this respect we would urge that a future review would contain a table noting the changes that had been made in response to the sustainability appraisal, or, if not made, the reasons for not making changes. The fundamental spatial strategy of the draft, essentially that of concentrating development in the larger urban areas, is in our view the most sound way of achieving sustainability. There is undoubtedly a sustainable vision in the draft strategy, though, as we note in the next chapter, it could be better presented.

1.35 As we note in the next chapter, more should be said about the environmental effects of climate change. Moreover, climate change is a particular issue in the East Midlands with all of the Lincolnshire Coast being at a greater risk of inundation in the coming years than it has ever
been. We began the examination to find views polarised as to what should be done. We closed it with having before us an Agreed Statement between the Assembly, the Government Office and the Environment Agency which we hope will provide a way forward properly recognising all the interests involved. This issue is so far reaching as to figure in no fewer than three chapters in this report: Chapters 4, 8 and 17.

1.36 Robustness and the ability to deal with changing circumstances must indisputably be a mark of a good plan. The world is changing rapidly, but even more rapid is the evolution of Government policy, particularly in relation to climate change and housing development, much of which change has happened since submission of the draft to the Secretary of State in December 2006 and it has continued to evolve even in the short time we have been writing this report. However, given the hazard of a rapidly changing world and policy environment, we consider that the draft strategy is as robust as it could be without resorting to bland statements of desiderata.

1.37 One matter on which we express concern is that in some areas, for example as regards transport policy, the availability of resources has been considered scantily if not at all. Of course this is a well known difficulty as regards the availability of public funding. But we would not be doing our duty if we were not to observe that in the East Midlands at least, sustainable spatial solutions are not to be had without sacrifice or cost. The easy, cheap way is not the sustainable way.

1.38 In the field of housing policy, not only has there been development of housing policy (welcome from what we have seen of the region’s housing problems) but also developments in the forecasts of population and households emerging from the Centre. The long expected deliberations of the National Housing Policy Advisory Unit will no doubt add to the difficulties of forever aiming at a moving target. But this is not all; in Chapter 4 (following) we express considerable criticism of the housing allocations in the draft strategy, and in Chapter 14 we express concern at the spatial expression of housing proposals and (as regards Nottingham) how these relate to the Green Belt.

1.39 Most of all, we find the Regional Transport Strategy as set out in section 3.4 of the draft strategy and Appendix 6 to Part 1 to be unsound. Here we are recommending a comprehensive reappraisal of the region’s transport strategy based on sounder evidence and sounder analytical underpinning, even though we recognise that to enable publication of the regional spatial strategy the transport strategy as proposed will have to stand on an interim basis only pending the incorporation of that re-appraisal at the next review.

1.40 In other respects, we trust that our analysis of the issues in each of the following chapters will enable the reader too see how sound we consider the particular topic or issue concerned.

1.41 In short, the draft strategy is a curate’s egg\(^{13}\) of soundness. Some parts are sounder than others. So we recommend [R1.4] that the

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\(^{13}\) From a “Punch” Cartoon. ‘The illustration shows a nervous young curate at his bishop’s breakfast table. Asked by his lordship whether the egg is to his liking, he is terrified to say that it’s bad and stammers out “Parts of it are excellent”’. *Brewer’s Dictionary of Phrase and Fable*, Revised Edition, Cassell, London 1981.
draft strategy be approved subject to the modifications recommended throughout.

The appendices

1.42. The extent to which the appendices in both parts of the draft strategy are actually part of the plan is unclear, and, indeed is the subject of dispute\textsuperscript{14}.

1.43. We review each appendix as appropriate to each of the topic chapters following. But our general recommendation [R1.5] is that each should be clearly linked to a policy in the main text, and that policy should equally clearly set out the status of the relevant appendix.

**Recommendations**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
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<th>Recommendation</th>
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<tbody>
<tr>
<td>R1.1</td>
<td>1.15.</td>
<td>A continuous numbering series throughout the draft strategy, both of pages and paragraphs.</td>
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<tr>
<td>R1.2</td>
<td>1.25</td>
<td>To emphasise the importance of motorways and main railway lines to the strategic planning of the region these features should be added to the Regional Key Diagram, as in the approved RPG8.</td>
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<tr>
<td>R1.3</td>
<td>1.25.</td>
<td>That the boundary of the Peak Sub-area is clarified in the Regional Key Diagram.</td>
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<tr>
<td>R1.4</td>
<td>1.41.</td>
<td>That the draft strategy be approved subject to the modifications recommended throughout.</td>
</tr>
<tr>
<td>R1.5</td>
<td>1.43.</td>
<td>Each appendix should be clearly linked to a policy in the main text, and that policy should equally clearly set out the status of the relevant appendix.</td>
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\textsuperscript{14} For example the Council for the Protection of Rural England (CPRE) considers that Appendix 1 (Implementation Framework) and Appendix 6 (Transport Investment Priorities) are inappropriate.
Chapter 2: Sustainability and Climate Change

Sustainability – Policy 1

2.1. Sustainable development is the core principle underpinning the planning process. In support of the preparation of the draft strategy a sustainability appraisal has been carried out. It has informed the preparation of the draft strategy and we are satisfied that it has been a reasonably thorough exercise at a level of detail which is appropriate at the strategic level. This has also included an Appropriate Assessment as required in accordance with the Habitat Regulations. Although more detailed sustainability appraisal has been carried out for the Three Cities and Northern sub-regional strategies this is not the case for the Lincoln sub-regional strategy or that for Milton Keynes South Midlands which pre-dates these requirements. The sub-area policies for the east, south and Peak have been subject to the sustainability appraisal of Part 1.

2.2. A non-technical summary of the sustainability appraisal, including recommendations on amendments to policy, has been bound in with the draft strategy. This will not be necessary in the final version and we assume that it will be omitted without the need for a formal recommendation to this effect. The non-technical summary does, however, highlight significant scope for improvements within the draft strategy and the need for further work on certain aspects. These are set out in section 22 of the full report and in the relevant appendices. Where appropriate we recommend specific amendments in the topic chapters which follow but many are of a detailed nature. We do not make specific recommendations to incorporate these but commend them in the interests of increased sustainability for the strategy as a whole. It would be helpful at a future review if a schedule were provided by the regional planning body as to whether or not the sustainability appraisal recommendations were accepted.

The vision

2.3. Criticism was made that the draft strategy fails to state a clear spatial vision, as required by national policy. Undoubtedly there is a vision in the draft strategy, drawn from the Assembly’s Integrated Regional Strategy. It would be helpful if the box expounding the vision was so headed. But we share the view that the stated vision is insufficiently spatial in character. So we recommend such a heading and an addition to the vision on the lines that in the next two decades development should be concentrated to re-fill and regenerate the

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15 Planning and Compensation Act 2004 s.39, PPS1 paragraph 3, Core document PP1.
16 Sustainability Appraisal of the draft East Midlands Regional Plan, September 2006, Land Use Consultants and GHK Ltd., Core document SUS5.
18 By White Young Green Environmental, appendices C1 and C2 of the Appraisal.
19 By Northamptonshire County Council and in the oral evidence of Professor David Lock.
20 PPS11, paragraph 1.7, Core document PP11.
22 Of Natural England.
towns and cities, developing sustainable, polycentric patterns of cities and towns that retain their distinctive identity, while working together as mutually supporting urban systems.

2.4. Nor does the stated vision of the draft strategy make explicit reference to the imperative of building a strong and healthy society. So we also recommend [R2.2] the insertion of “building a strong and healthy society” in the first paragraph of the vision box.

2.5. Sustainability is given expression in the draft strategy by Policy 1. This links very strongly to the objectives of the Integrated Regional Strategy and reflects the objectives used in the sustainability appraisal. Despite some strongly held views that a truly over-arching policy on sustainable development is required we recognise that Policy 1 covers the full range of concerns. Moreover, while more radical alternatives are also suggested with examples from other regions, or indeed from Strategic Policy 3 in the Milton Keynes South Midlands Sub-Regional Strategy setting the criteria for the creation of sustainable communities, we are not convinced that these provide any stronger guidance than Policy 1. They are simply alternative approaches.

2.6. There is no benefit in the replication at regional level of the policy guidance contained in PPS. It is a key principle that sustainability considerations should run throughout the draft strategy and there should be an holistic approach to the achievement of economic, social and environmental objectives. We agree that the key lies in the implementation of the objectives of Policy 1 in the individual policies which follow. Appendix 1 to Part 1 gives an indication of the objectives to which each policy relates but we consider and recommend [R.2.3] that this should be expanded to spell out exactly in what way each policy gives effect to the objectives. This should help to clarify the weight accorded to each objective and how any apparent conflicts between them have been resolved.

2.7. We also consider that the introductory section to Policy 1 requires some strengthening. It lacks a clear statement at the outset as to the mechanisms to achieve the policy objectives. This only requires a minor amendment to the wording of the introduction. To this end we recommend [R2.4] the replacement of the words “the following core objectives should be met” by “all strategies, plans and programmes should meet the following core objectives”.

2.8. There were a large number of suggestions for amendments to the wording of the various objectives which would place more emphasis on certain aspects, such as environmental capacity or biodiversity, but in many cases closer examination of the wording reveals that the issues are covered, if not always in the detail some would like. Cross-referenced qualifications are unnecessary. There are, however, a relatively small number of areas where we think additional text should be introduced.

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23 As suggested in the oral evidence of Professor Lock in the discussion of Matter 2A.
24 As urged by the Brethren’s Gospel Trust in oral evidence.
25 Core document REG39.
26 For example, Natural England and English Heritage.
27 For example the "ecological footprint“ policy in the RSS for the South-West of England.
28 Core document PP1.
29 As suggested by Lincolnshire County Council.
30 This applies, for example, to many of the changes suggested by the East Midlands Environment Link.
2.9. Firstly, there was a wide body of opinion\(^{31}\) that there should be an objective to ensure that sufficient housing is provided to meet the needs of the region. Housing is mentioned under objectives a) relating to the reduction of social exclusion and c) improving health and, in terms of accessibility, under objective e). There is no direct reference to quantum despite the fact that the first objective for the sustainability appraisal is to ensure that the housing stock meets community needs.

2.10. In principle we agree that there should be an additional objective to cover this aspect. It need not set out requirements relating to mix and affordability\(^{32}\) because this is implicit. **We recommend** [R2.5] a stand-alone core objective under Policy 1 to read “to ensure that the existing and future housing stock meets the needs of all communities in the region.”

2.11. A second area which is somewhat lacking in force is in the references to sustainable transport modes. Not only do we consider it essential that transport policy and the regional transport strategy must be fully integrated with the spatial strategy as a whole (see Chapter 12) but in both objectives e) and h) of Policy 1 there is reference to encouraging patterns of new development that reduce the need for travel. We accept\(^{33}\) that the emphasis in national policy is in terms of reducing the need to travel *especially by car* and **we recommend** [R2.6] the addition of those words at the end of the third bullet point under objective e), but in the context of climate change all forms of transport, except walking and cycling, give rise to CO\(_2\) emissions. We discuss the climate change objectives further below.

2.12. Thirdly, there would be benefit in the inclusion\(^{34}\) of a reference to cultural assets under objective f) although that does somewhat widen the concept of “environment”. **We recommend** [R2.7] the addition of this to the first bullet point under f).

2.13. We have also considered whether it would be appropriate to refer further to the concepts of environmental capacity and environmental infrastructure. Clearly it is an essential facet of sustainable development that housing, employment and other forms of development are accommodated without adverse environmental impact. The objectives cover these in general terms.

2.14. Fourthly, although the draft strategy will need to be read alongside PPS1\(^{35}\), we consider that objectives b) and c) also require strengthening to more clearly relate to the wording of paragraph 27(iii) of PPS1. Objective b) needs to stress the desire within communities for a clean, safe and crime-free environment and objective c) should refer not just to health, but to the mental, physical and spiritual well-being of the population\(^{36}\). It should be clear that the third bullet covers cultural activity also. **We so recommend** [R2.8].

\(^{31}\) From the Home Builders’ Federation and developers to the Government Office.

\(^{32}\) As suggested by the Government Office.

\(^{33}\) Pre-examination statement of David Lock Associates.

\(^{34}\) As urged by Nottinghamshire County Council.

\(^{35}\) Core document PP1.

\(^{36}\) Pre-examination statement by Mr John Shephard of the Brethren’s Gospel Trust. Also *Investment for Health* EMRA March 2003, Core document HEA5.
Climate Change

2.15. Although climate change is a key concern in the assessment of the sustainability credentials of the draft strategy and is covered by objectives h) and i) in Policy 1, the draft strategy pre-dates the consultation on the supplement to PPS1 on Planning and Climate Change as well as those for the Code for Sustainable Homes and Building a Greener Future. However, these may well have been finalised before the approval of this draft strategy and we consider it appropriate to assess the extent to which the draft meets the guidance in the PPS Supplement.

2.16. What is clear to us is the very high priority placed by the Government on measures to deal with the consequences of climate change. The Government has published a Climate Change Bill to introduce national measures to meet a target for the reduction in CO₂ emissions of 20% below 1990 levels by 2010 with a long-term ambition of a 60% reduction by 2050.

2.17. The consultative draft Supplement to PPS1 sets out the key objectives for spatial planning and of particular relevance for the draft strategy is the advice in paragraphs 9 - 12 of this document.

2.18. While the examples of other regional strategies might suggest a separate policy on climate change, national policy stresses that policy on climate change should not be brought forward in isolation; rather it is a key and integrating theme which should be addressed in conjunction with economic, social and environmental concerns.

2.19. Moreover, “parachuting in” an entirely new policy is not what we favour. So we recommend a new paragraph before Policy 1 giving much greater emphasis to climate change and providing a cross-reference to relevant policies. This ought to read as follows:

"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 mitigation in some way, and 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:

- 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 41-54)."

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37 PPS1, paragraphs 13(ii) and 20, Core document PP1.
38 Issued by DCLG in December 2006, Core document PP1b.
39 Core document HOU56.
40 Core document ENV42.
41 Economics of Climate Change, Stern Review, October 2007, Core document ENV43.
42 Core document ENV41.
43 Core document PP1b, paragraph 10.
2.20. We think that the essential approach in Policy 1 through somewhat expanded objectives h) and i) will provide adequate guidance for local development frameworks and other strategies being prepared in the region. The fact that all local authorities in the region have signed up to the Nottingham Declaration on Climate 44 is a very positive step which warrants a mention in the regional strategy in the preamble to Policy 38, paragraph 3.3.67. We discuss this further in Chapter 11, paragraph 11.26.

2.21. In the draft Supplement to PPS1 the Government anticipates that 45 regional planning bodies will ensure that the spatial strategy is in line with applicable national targets, in particular for cutting carbon emissions. There were strong calls for targets to be incorporated within the regional strategy, not just as an overall target but, for example, for a 3% year on year reduction but we consider that such an aspirational target would be beyond the means of the regional strategy to achieve and contrary to the advice in paragraph 12 of the draft Supplement. However, the same paragraph gives encouragement to the inclusion of trajectories for the expected carbon performance of new residential and commercial development. We consider this to be the right way forward as a monitoring tool but the trajectories must be linked to those policies which implement measures to achieve these aims. We recommend [R2.10] that the introduction to objective h) should refer to cutting CO₂ emissions over time in line with the trajectories which should look to achieve at least a 60% cut by 2050.

2.22. Work has been commissioned by the Assembly 46 which shows a series of trajectories based upon a whole range of possible scenarios. These need to be firmed up with definite decisions taken on the policy measures needed to achieve a particular trajectory. This should be included in the draft strategy. We have no reason to think that this work could not be completed for this review and so formally recommend [R2.11] its inclusion.

2.23. The zero traffic growth target originates from the sustainability appraisal and the identified need to meet national CO₂ emission targets. However, as reported in Chapter 12, we consider that the traffic growth reduction target is not adequately supported by identified transport priorities. The last bullet under objective h) should more positively reflect the guidance given on location and pattern of development, with particular reference to major traffic generators. We recommend [R2.12] that this should read “ensuring that new development, particularly major traffic generating uses, are located so as to reduce the need to travel, especially by private car.”

2.24. We are far from convinced that enough has been done to identify and take into account the region’s vulnerability to climate change. This is directly linked to issues of environmental capacity in the light of the levels of additional housing proposed in the draft regional strategy. Particular concerns relate to water supply and the risk of flooding due to sea level rises. We discuss these issues in more detail in Chapters 8 and 17 respectively.

44 Oral evidence of Mr Mike Meech of the Government Office.
45 Core document PP1b, paragraph 9.
2.25. In line with the advice in paragraph 136 of the non-technical summary of the sustainability appraisal, objective i) should look more widely at measures which might minimise the impact of climate change, rather than an additional bullet point or an expansion to objective g). So we recommend [R2.13] a policy be included to accommodate the enhancement and extension of natural habitats to accommodate species migration allowing the biosphere to adapt to climate change especially through the reduction of the heating impact of urban development, to act as carbon sinks and to absorb flood water.

2.26. We agree47 that reference should be included to the Climate Change Programme of Action commissioned by the East Midlands Climate Change Partnership and include commitment to the implementation of proposals arising aimed at mitigation and adaption. We recommend [R2.14] the inclusion of a paragraph to this effect to follow [R2.10] above.

Policy 3

2.27. Policy 3 might seem somewhat out of place in the section of the regional strategy dedicated to the spatial strategy because it applies across the whole region and only to a very limited extent does it influence the location of new development. It is, however, integrally linked to Policy 1 and the issues discussed above stemming from concerns over climate change and sustainable development. High quality design and high construction standards are an essential part of the Government’s drive to achieve carbon neutrality for all new housing by 2016.

2.28. The policy is rightly criticised for being somewhat out-of-date, especially in the reference to the BREEAM standard (third bullet point) which, for housing, is to be replaced by the Code for Sustainable Homes48. At the present time in Building a Greener Future49 the Government has indicated an intention to move towards zero carbon homes (Code level 6) by 2016 with interim stages of Code level 3 by 2010 and Code level 4 by 2013. Although this is a consultation document, there is no clear evidence as to why the East Midlands should seek to achieve even higher standards more quickly. But we accept50 that there is benefit in the application of standards at a national level. The second part of the bullet point relating to lifetime home standards also relates only to housing. Housing should be dealt with separately from other forms of building.

2.29. We consider that the qualification in the second bullet point relating to the incorporation of renewable energy technologies and sourcing materials sustainably “wherever possible” is a reasonable one as the word “possible” can include questions of viability for individual developments.

2.30. The fourth bullet point looking towards carbon neutrality is restricted to urban extensions whereas paragraph 3.3.68 refers to “all development”. We consider this to be somewhat aspirational especially as there is no timescale indicated but, bearing in mind that most urban extensions being planned now will be developed after 2011 it does not seem unreasonable. “All development” would be too optimistic, at least in the short term.

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47 With the Government Office.
48 Core document HOU56.
49 Core document ENV42.
50 Pre-examination statement by Home Builders’ Federation.
2.31. We agree that the sixth bullet point no longer properly reflects the emphasis in paragraphs 46 and 47 of PPS3 in relation to local density standards although there is still a strong emphasis on making efficient use of land. It is that to which the bullet point should refer.

2.32. We therefore **recommend** [R2.15] that the wording in the bullet points in Policy 3 be amended as follows:

- the third bullet point to read *ensuring that new buildings (other than dwellings) are compliant ... ‘very good’.*

- Add a new bullet point to read *ensuring that all new housing accords with the standards set in the Code for Sustainable Homes and is capable of being adapted ...*

- the sixth bullet point to read *making the most efficient use of land in line with national guidance;*

### Recommendations

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<tr>
<td>R2.7</td>
<td>2.12.</td>
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51 With the Home Builders’ Federation.
52 Core document PP3.
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Chapter 3: The Spatial Strategy

Concentration – the fundamental strategy; the “New Growth Points”; regeneration; the role of the Three Cities; rural areas; recommendations; a cautionary word.

Concentration — the fundamental strategy

3.1. Concentrating development and all other urban activity – that is the fundamental strategy of the draft strategy as set out in Policy 4. This policy goes on to prioritise concentration in the region’s five principal urban areas. These five are the built up areas centred on the Three Cities — Derby, Leicester and Nottingham, together with Lincoln and Northampton. Priorities then descend through the other growth towns, including those in the growth areas of Northamptonshire, to named sub-regional centres and lastly to the satisfaction of the needs of other settlements and rural areas. Recognition is given to the concentration strategies of neighbouring regions through restricting development in the areas where development would conflict with those strategies.

3.2. Coupled with the outline of the essential strategy in Policy 4, Policy 2 sets out a sequential approach for site selection in local planning. Policy 2 also gives priority to urban re-cycling and sets out a number of sustainability criteria.

Discussion of the strategy

3.3. We have no problems with the fundamental strategy of concentration, which, although not to be found in national policy, is to be found in the strategies of other regions and is well supported in the academic literature from Newman and Kenworthy onwards as the basis supporting the maximum use of public transport, minimising CO₂ emissions and promoting access to urban facilities. We were pleased to note that this fundamental strategy attracted little criticism, although we consider that care should be exercised in relation to opinions that would dilute the rigour of the fundamental strategy. Evidence throughout the examination showed a good deal of departure from the fundamental strategy already, probably too much.

3.4. Policy 4 refers to “development”. In the context of a statutory planning document “development” must be that which is defined by s.55 of the Town and Country Planning Act 1990. It should be made clear that the policy applies to all economic activity (see paragraph 3.28 below) as well as simply “development”.

3.5. We have some sympathy with the criticism that the priorities of this policy were unquantifiable or at least that the term “development at a

53 It was plain to us from all the discussion at the examination that “in” the principal urban areas, in this context, means “in or adjoining”.
55 For example those of The Crown Estate and the Country Land and Business Association (pre-examination statements and oral evidence) who would give greater priority to rural development and the views of emda, who, while supporting the strategy, would also support “lagging” rural areas, (pre-examination statement).
“lesser scale” was too vague\textsuperscript{56}, but we do not consider that a greater degree of quantification, for example a percentage target, would be helpful. Our preference is for a clear statement of priority which will guide the intelligent application of the general principle to consideration of sustainability on the ground.

3.6. We therefore strongly commend the general principles behind Policy 4 which should be further strengthened by reference to the priority to be given to concentration on the principal urban areas. Nevertheless, we share the view that the fundamental strategy could be explained better\textsuperscript{57} (see paragraph 3.28 below [R3.1], [R3.3]).

3.7. Policy 2, however, is a different matter. Despite its reference to local development frameworks, and its length, it reads like a development control policy which could be applicable anywhere and was criticised\textsuperscript{58} both for overlapping with Policy 4 and in setting out a sequential test for all forms of development, not only extending national policy unnecessarily, but extending old policy\textsuperscript{59} to boot.

3.8. We support this criticism whilst acknowledging the desirability of using previously developed land wherever practicable for all purposes in preference to breaking into greenfield land. We recognise, of course, that some developments cannot readily be steered to previously developed land, but nevertheless there must be a strong preference to that end. Looking ahead, as the approach to the consideration of draft strategy must do, we regard the process of urban recycling (not just the use of the present stock of previously developed land) as a priority.

3.9. We support also the criticism\textsuperscript{60} of the sequential approach as set out in Policy 2 because its rigid application could deny the needs of rural areas.

3.10. We think that there is no real need to set out a list of sustainability criteria in regional policy. To a large extent these are to be found throughout the series of Planning Policy Statements and Guidance and are not likely to be unknown to qualified and experienced local planners preparing policies for insertion in their local development frameworks.

3.11. Criticism was also made\textsuperscript{61} about the relative order of Policy 2 and Policy 4.

3.12. Policy 2 is a carry over from an earlier generation of regional strategy and in our opinion is largely replaced by the much stronger Policy 4 of the draft strategy. The important feature of Policy 2, the strong preference for the use of re-cycled land wherever practical, can be added to a further strengthened Policy 4 (see paragraph 3.28 below, [R3.1], [R3.2]).

\textsuperscript{56} Oral evidence of Mr Steve Birkinshaw of the Government Office.
\textsuperscript{57} Pre-examination statement of the Government Office.
\textsuperscript{58} By South Derbyshire District Council, and Barton Willmore among others in both pre-examination statements and oral evidence.
\textsuperscript{59} The sequential test as set out in PPG3 of 2000, cancelled by PPS3 of November 2006, Core document PP3.
\textsuperscript{60} Raised by the Council for the Protection of Rural England (CPRE) in both their pre-examination statement and in oral evidence.
\textsuperscript{61} By Lincolnshire County Council among others in their pre-examination statement and oral evidence.
The “New Growth Points”

3.13. A New Growth Point is not a statutory designation, but rather the Government’s response to invitations from areas where there is a good case for accelerated, additional economic and housing growth, and where it can be shown to relieve pressure on high demand areas and tackle affordability issues. Acceptance of proposals by Government does not pre-empt scrutiny in the context of regional and local planning, but rather they are to be subject to robust testing and public consultation through these regional and local planning processes.

3.14. Among the criteria for acceptance are that the proposal should be developed at least to the level needed for inclusion in the regional spatial strategy process, and that it must offer at least 20% housing growth over a baseline equivalent to regional planning guidance as it stood in January 2003.

3.15. Four growth points are proposed:

Three Cities and Three Counties — Derby, Leicester and Nottingham;

Grantham;

Lincoln; and

Newark on Trent.

3.16. Although it is not impossible for proposals made under the New Growth Points initiative to cut across regional spatial strategy, it was explained that the expansion of all these proposals had been developed in the course of working up the proposals for the draft strategy, and that they therefore are all in accordance with the fundamental strategy of concentration. We examine each of the proposals in turn in later chapters of this report, but in general accept this useful explanation.

3.17. A little more by way of explanation could be given in the supporting text of the draft strategy than the two brief paragraphs (2.3.11 and 2.3.12) already given to the subject (see paragraph 3.28 below, [R3.4]).

Regeneration

3.18. The draft strategy shares with the Regional Economic Strategy the aim of becoming “a flourishing region”. But in our view, the need for regeneration is not just an economic necessity but goes to all aspects of the regional strategy – to housing renewal, the continued re-cycling of urban land, the continued renewal of health and social services, the renewal and updating of public transport, the social regeneration of deprived areas of town and country, to name but a selection of the areas of regeneration necessity. “Urban Renaissance” is another name for this process – the making of a region fit for the people of the twenty-first century, many of them – most of them indeed – yet to be born.

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62 This and the preceding paragraph are taken from http://www.communities.gov.uk/housing/housingsupply/growthareas/newgrowthpoints/criterianew/, accessed during the examination.
63 By Mr Andrew Pritchard on behalf of the Assembly.
3.19. All this is clear from the Assembly’s Integrated Regional Strategy as set out in the box in Section 1 of the draft strategy. The planning process, now broken away from purely land use considerations, has much to contribute, perhaps more than some who appeared before us appreciate. We consider that planning for regeneration in its fullest, holistic sense should be part of the fundamental strategy of the plan (see paragraph 3.28 below, [R3.5]).

The role of the Three Cities

3.20. We invited discussion as to the extent to which the Three Cities — Derby, Leicester and Nottingham — should be seen as a single polycentric city.

3.21. We were impressed by evidence that the spatial pattern of the Three Cities looked like that of the towns and cities of West Midlands around 1900 but which are now grouped into the West Midlands conurbation. Together the Three Cities have the same economic punch as the West Midlands conurbation and they act as a virtual conurbation without merging towns or losing the identity of each. And they share issues such as deprivation, transport and congestion that are increasingly being resolved in a trend to closer working.

3.22. While Birmingham offers higher order financial services than are to be found in the Three Cities, they are by no means satellites of Birmingham. Rather, the cities should be seen as not competing individually with Birmingham but by working together can achieve critical mass which then allows equality and can compete better with Birmingham, Manchester, and other national “Core Cities”.

3.23. Several flourishing towns lie within the area of the Three Cities, the “Sub-area”. These too have a role to play.

3.24. The priority to be given to each of the three cities in the distribution of development and to the sub-regional centres within their sub-area is set out already in Policy 4. Nevertheless, we consider that the important role of the Three Cities as the “Core City” of the region should be emphasised in the supporting text (see paragraph 3.28 below, [R3.5]).

Rural Areas

3.25. The main policy of the draft strategy governing regional priorities for rural areas is Policy 5, with Policy 23 relating to economic diversification in rural areas. We heard much evidence which would suggest that the draft strategy neglects the needs of rural areas, but we do not see this. The rural areas of the region are by no means homogeneous; what would be appropriate in rural Lincolnshire might not be so appropriate in and around the Three Cities sub-area. Having regard

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65 Core document REG39.
66 PPS11, paragraph 1.6, Core document PP11.
67 Oral evidence of Mr Pritchard.
68 Oral evidence of Mr Pritchard, Mr Neil Moore on behalf of Leicester City Council and Mr Matt Gregory on behalf of Nottingham City Council.
69 As we were reminded by Mr Guy Longley of Charnwood Borough Council in oral evidence.
70 From the CPRE, the Crown Estates and the East Midlands Rural Affairs Forum in both written and oral evidence.
to PPS7\textsuperscript{71}, Policy 5 is right, in our opinion, to refer to both the distinctive character of rural communities and also their vitality. It is right also to refer to an appropriate scale in the diversification of the rural economy. It has to be realised that development in rural areas beyond that which is essential to the delivery of local needs can be quite unsustainable, leading to the worsening of unsustainable patterns of commuting between one small village and another and from villages and urban areas out into the countryside. As PPS7 points out\textsuperscript{72}, the key places for rural regeneration are the towns and villages which serve the rural areas.

3.26. So we have no problem with the reference to rural development in Policy 4, nor, for the most part, with the content of Policy 5. But we think it only right to resist attempts to confuse matters by putting a gloss on what is the clear national policy of PPS7. Moreover, the policy of PPS7 runs to some 20 pages and there is much in it to guide local planning. So despite the injunction in PPS7 that:

\begin{quote}
planning policies in regional spatial strategies \ldots should facilitate and promote sustainable patterns of development and sustainable communities in rural areas\textsuperscript{73}
\end{quote}

we are mindful also of the need for policies in a regional strategy to be specific to the region and neither repeating national policy nor resorting to platitudes\textsuperscript{74}.

3.27. We see nothing in the region that would justify deviation from national policy and would justify a policy set of its own. Unlike Policy 23, which is considered in Chapter 5 of this report, Policy 5 is entirely of a generic nature. Local planners will of course find adequate guidance in PPS7 for their work, particularly in tailoring the overall approach to national policy to the “circumstances, needs and priorities of the rural communities and businesses in their area, and of the interdependence between urban and rural areas”\textsuperscript{75}. All that is needed, in our opinion, is a clear general statement of policy in Policy 4, with a suitable cross-reference to PPS7 in the text (see paragraph 3.28 below [R3.1], [R3.3]).

**Recommendations**

3.28. **We therefore recommend:***

[R3.1] That Policy 4 be modified by clarification that it applies to all sorts of economic activity as well as development in the statutory sense; the inclusion of a statement in sub-paragraph (a) according priority to concentration on the principal urban areas; that sub-paragraph (d) be replaced by a new sub-paragraph taken from the first five lines of Policy 5; and the insertion of a new sub-paragraph (e) stating in respect of the location of all forms of development a strong preference for previously developed land. (See also paragraph 4.81 in the Chapter 4 (following) concerning a target for previously developed land for housing.)
[R3.2] That Policies 2 and 5 be deleted from the draft strategy.

[R3.3] A more full explanation of the strategy and a cross reference to Planning Policy Statement 7 (PPS7) should be given in the supporting text to Policy 4 in Chapter 2.

[R3.4] A fuller explanation of the four New Growth Point proposals and their relationship to the fundamental strategy of concentration should be given in Chapter 2 of the draft strategy.

[R3.5] References be made also in the supporting text of Chapter 2 to regeneration in its fullest, holistic sense being part of the fundamental strategy of the draft strategy; and to the role of the Three Cities together working as the “Core City” of the region.

**A cautionary word**

3.29. While we have no doubt that the policy of concentration is the only truly sustainable one for the region, we feel obliged to note that if it can be achieved at all, it can only be by dint of a substantial development of urban public transport. Such necessary development requires both action and resourcing. Without it, the effect of concentration will be only to worsen existing congestion to an intolerable degree, creating pressures for the sort of car-based strategy that prevailed in the 1960s and 1970s.

3.30. We say more on this subject in our Chapter 12.

**Recommendations**

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<td>3.28.</td>
<td></td>
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</tbody>
</table>
Chapter 4: Housing

National policy for the provision of housing; the overall volume of housing development in the region 2001-2026; the distribution of housing across the region (by sub-area); Policy 15 – affordable housing; rural areas; Policy 16 – housing for Gypsies; Policy 17 – targets for the efficient use of land; Policy 18 – cross boundary or inter-regional working.

National policy for the provision of housing

A rapidly evolving policy context

4.1. Possibly no policy area has been the subject of such rapid evolution since the draft strategy was put out to public consultation in September 2006 than that of housing provision. Planning Policy Statement 376 was issued in its final version only on 29 November 2006 and since then Government concern to ensure an adequate supply of housing to address issues of affordability has been repeated both by the Prime Minister77 and in the Ministerial statement launching the Housing Green Paper78.

4.2. The Government’s key housing goal, as repeated in paragraph 9 of PPS3 is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. Advice on assessing an appropriate level of housing provision is given in paragraphs 32-35 in the PPS. It is expected to be a strategic, evidence-based approach and the draft strategy should set out the level of overall housing provision for at least a 15 year period distributed by housing market and local authority areas79.

4.3. It is also important to bear in mind that Government policy is not only about providing more houses but also to ensure that new development is planned in a sustainable manner (a duty under the 2004 Act80); to create strong and prosperous communities whilst seeking to minimise environmental impact taking account of climate change81 and flood risk82. We acknowledge that achieving the most appropriate balance between these factors requires careful judgment.

The overall volume of housing development in the region 2001 - 2026

Relationship to published sub-national household projections

4.4. When the draft strategy was submitted the latest household projections were 2003 based83. These have been used as the starting point to inform provision within each housing market area, as set out in Policy 14, and in more detail in Appendix 2 and Part 284. However, by the time of the examination these had been superseded by 2004 based

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76 PPS3, Core document PP3.
77 Statement to the House 11 July 2007 increasing national target to 240,000 new homes a year by 2016.
78 Statement to the House by Housing Minister Yvette Cooper 23 July 2007.
79 PPS3, paragraph 34.
80 Section 39 of the Planning and Compulsory Purchase Act 2004.
81 Draft PPS on Climate Change, Core document PP1b.
82 PPS25: Development and flood risk, Core document PP25.
83 Published in March 2006, Core document HOU17.
84 The methodology is summarised in Housing Technical Paper, Core document HOU23.
population projections\textsuperscript{85}. The latter suggest that there will be 21,000 more households in the region by 2026 than the 2003 projections did\textsuperscript{86}. We have some sympathy with the Assembly in that they are forever aiming at a moving target. We heard\textsuperscript{87} that the Office of National Statistics will produce revised 2004 based sub-national population projections in September\textsuperscript{88} this year and, of course, more up-to-date household projections will follow\textsuperscript{89}. We also accept that projections are just that, and that they are trend-based. They cannot and do not reflect the policy intervention represented by the application of the spatial strategy at sub-regional level. Nevertheless, we consider that in order to give proper effect to the guidance in paragraph 33, regional housing provision should be adjusted to reflect the 2004 projections with consequent adjustments at housing market area/district level. We are satisfied that the draft strategy is sufficiently robust to accommodate what would be a relatively modest increase in the overall level of development and would not give rise to significant sustainability concerns, subject to local considerations.

4.5. Table 1, appended to this chapter, shows the effect of applying the same “net policy impact” figure for each housing market area as shown in Appendix 2 of the draft strategy, which excludes Northamptonshire where special considerations apply (see below). This also applies a correction factor to not allow for a reduction in the vacancy rates, allows for completions 2001-6 and gives total as well as annual figures.

4.6. Although this table shows figures for housing market areas it is necessary, in accordance with the guidance in PPS3, to provide figures for each administrative district. This requires a consideration of the additional policy interventions which we discuss in later chapters of this report. In attempting to do this we have found that to apply the net policy figure directly at district and unitary authority level introduces some gross distortions. This is especially the case in those districts and unitaries for which the net policy impact is very large, for example where an urban extension is to be located. Accordingly, we recommend [R4.1] that the relevant local planning authorities within each housing market area should agree with the Assembly the distribution of housing provision between their authorities to total the 2004 adjusted figures as shown in the table below. When agreed the revised figures should be shown in Policy 14 and relevant sub-area policies. This table takes account of the additional policy interventions which we recommend in this report, as explained in the table footnotes a-f.
### Housing Market Area

<table>
<thead>
<tr>
<th>Housing Market Area</th>
<th>Total housing provision 2006-26 (dwellings)</th>
<th>Annual provision 2006-26 (dwellings a year, rounded up)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Lincolnshire</td>
<td>40,720</td>
<td>2,040</td>
</tr>
<tr>
<td>Coastal Lincolnshire(^{(a)})</td>
<td>8700</td>
<td>435</td>
</tr>
<tr>
<td>Peterborough (partial)(^{(b)})</td>
<td>22,995</td>
<td>1,150</td>
</tr>
<tr>
<td>Nottingham Outer(^{(c)})</td>
<td>36,595</td>
<td>1,830</td>
</tr>
<tr>
<td>Northern(^{(d)})</td>
<td>29,435</td>
<td>1,475</td>
</tr>
<tr>
<td>Peak(^{(e)})</td>
<td>10,000</td>
<td>500</td>
</tr>
<tr>
<td>Derby</td>
<td>36,505</td>
<td>1,825</td>
</tr>
<tr>
<td>Leicester &amp; Leicestershire</td>
<td>79,940</td>
<td>4,000</td>
</tr>
<tr>
<td>Nottingham Core(^{(f)})</td>
<td>60,110</td>
<td>3,010</td>
</tr>
<tr>
<td><strong>East Midlands Region (excluding Northants)</strong></td>
<td><strong>325,000</strong></td>
<td><strong>16,250</strong></td>
</tr>
</tbody>
</table>

**Footnotes:**

(a) The figure for Coastal Lincolnshire derives from recommendation [R17.7]. It allows only for existing planned commitments.

(b) The figure for South Holland is restricted to existing planned commitments in accordance with recommendation [R17.7]. The housing market area total has been reduced by the number of additional dwellings (3,361) which would need to be provided to meet the submitted RSS figure, as in Core document HOU43.

(c) This includes Hucknall as part of Ashfield district. No separate adjustment made.

(d) The housing market area total is reduced by 50 dwellings a year (total 1,000) to reflect recommendation [R15.3] in relation to Bassetlaw.

(e) The housing market area figure has been increased to allow for additional provision in the Derbyshire Dales and High Peak districts in accordance with recommendation [R18.3].

(f) The amended figures in recommendation [R14.16] will need to be adjusted to accommodate the higher housing market area provision.

**The “Northamptonshire Factor”**

4.7. The approach used by the Assembly in assigning housing numbers at sub-regional (housing market area and district) level is plan-led, that is it takes the household projections as a starting point but, recognising that they are trend based, there is then an iteration to adjust the distribution to reflect the policy intervention of the draft strategy in the interests of sustainability, including a consideration of infrastructural and environmental capacity constraints. We consider this to be a sound approach in principle.

4.8. This does, however, lead to a largely “bottom up” approach and the Assembly acknowledged that there has been no “regional control
A population (household) movement between regions is reflected in inter-regional migration assumptions which are subject to discussion between the regional planning bodies. We accept this although we consider it very important that an overview is maintained by the Government to ensure that national house building targets are achieved.

4.9. We consider that this is clearly demonstrated by the argument advanced at the examination by the Home Builders’ Federation and certain development interests which they termed the “Northamptonshire factor”. Northamptonshire falls within the Milton Keynes South Midlands growth area for which a sub-regional strategy has been approved with the relevant parts incorporated in the approved RSS8; only minor alterations are proposed in this review. As a result the housing provision figures for Northamptonshire are well in excess of those which might otherwise be derived from either the 2003 or 2004 household projections. The two Northamptonshire housing market areas together account for 25% of the region’s housing provision. Thus, it might be expected that housing provision in the region as a whole would be well above the projected household increase.

4.10. This is not the case. Although the figures in Appendix 2 Table 1 of the draft strategy show that the proposed annual provision represents an increase of 28.6% on those of the approved RSS8 in terms of predicted household change the draft strategy provides only a 2.9% margin above the 2003 DCLG trend (household) projection and is 1.2% below the 2004 projection. Of course, the regional figures disguise significant variation at housing market area level to reflect the spatial elements of the draft strategy as illustrated in Table 1.

4.11. The Northamptonshire growth area is a specific policy response to the Government’s Sustainable Communities Plan. It is an approved strategy which represents a very significant addition in housing provision to that proposed in the predecessor RPG8. It should be treated as an addition to the region’s growth in recognition of the strong economic performance of the sub-region and in the context of the development of the south-east of England. We are fully in accord with those who argue that the failure to add the Northamptonshire growth element to a trend calculation in the rest of the region is a major weakness in the draft strategy. It will make it more difficult to meet the Regional Development Agency’s aim to reduce intra-regional economic disparities. Furthermore, we consider that the recent issue of the Housing Green Paper has widened the agenda for growth across all regions.

4.12. The extent of the underprovision in numerical terms is well illustrated by an examination of the figures in Table 1 of Appendix 2 to the draft strategy. As stated above, these show a marginal over-provision against the 2003 projection in the region as a whole but when the Northamptonshire element is excluded the provision in the rest of the region is 15,295 dwellings a year to meet a 2003 projected household increase of 16,176. This becomes 16,900 in the 2004 based projections.

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90 The Assembly pre-examination statement for Matter 4A, paragraph 1.
91 As the revised Appendix 2 shows provision in Northampton is almost 1½ times the 2003 projected figure, Core document HOU43.
92 Assumptions for converting household change to dwelling need are discussed in paragraphs 4.17-4.19 below.
93 Home Builders’ Federation and developer interests.
If a simple 3.7% factor is applied to this to allow for vacancy in the stock 16,900 households would require 17,525 dwellings to accommodate them.

4.13. This simple calculation may require refinement but it leads us to conclude that there is a shortfall in housing provision in the draft strategy of 2,235 dwellings a year or 55,875 dwellings over the whole 25 year plan period94. In other words regional provision would need to be increased to 22,65395 a year (total 566,325) even without any further adjustment to the Northamptonshire figure96. As there have been 89,341 completions (2001-6) the remaining 476,984 dwellings would need to be completed at an annual rate of 23,850 a year97. Of course, there are other factors which can be taken into account and alternative methods of calculation98.

4.14. It may not be appropriate to ring-fence the whole of the Northamptonshire provision in this way because of the inter-relationship with Leicestershire, for example, but in so far as the housing market areas are intended to be reasonably self-contained we consider that the cross-boundary influence will not be statistically significant. There was no suggestion during the examination that the region should not seek to meet housing needs arising from the projected growth in households. To do otherwise could not address affordability problems and would not reflect economic growth opportunities in the wider region.

4.15. However, we consider that additional provision on such a scale, representing an increase of some 11% over the draft strategy would inevitably have sustainability implications, not least of all for transport. It would be essential to test the options for accommodating such growth against the main elements of the draft strategy and the capacity of the area to accommodate it; this is despite the work done by the Home Builders’ Federation to support their suggested provision99. There are legitimate concerns identified in the sustainability appraisal work and stressed by the East Midlands Environment Link with regard to water resources and biodiversity in particular. It is not clear that there are any “showstoppers” but the main thrust is that the more development the more environmental resources will be challenged. Consequently, we conclude that a further round of consultation is necessary to test the options for accommodating such a level of growth. Those options might involve the identification of new or expanded growth points or new settlements, which might include eco-towns, as we explain in our Chapter 20.

4.16. We are aware of the proposals in the Housing Green Paper to bring forward an early review of regional spatial strategies in order to deliver the increased provision envisaged by the Government. We consider that the draft strategy is sufficiently robust to provide an

94 The equivalent 2003 based figure is 16,775 dwellings a year representing a shortfall of 1,485 dwellings a year or 37,125 over the 25 year plan period.
95 Or 21,903 dwellings using the 2003 based projections.
96 See Chapter 13. This will need to be done but requires a multilateral review of the MKSM sub-regional study.
97 The equivalent figures derived from the 2004 trend projections (see Table 1) is 449,220 dwellings or 22,460 a year (rounded).
98 The Home Builders’ Federation 2004 based figure applying 3.7% vacancy only (not allowing for concealed households) is that 435,540 dwellings are required outside Northamptonshire against RSS provision of 382,250 representing a shortfall of 53,290 dwellings or 2,132 a year.
99 Land Use Consultants Sustainability Implications of the Development Industry Alternative Housing Scenarios, Core document HOU66.
adequate context for the first round of local core strategy preparation. In our view it is not in the public interest to delay approval of this regional strategy alteration pending the further work which would be required to justify and test the increased provision against sustainability criteria.

**The calculation of dwelling provision**

4.17. There has been criticism of the methodology used\(^{100}\) to assess the numbers of additional dwellings required to meet the needs of the estimated households. The first of these is the absence of any additional allowance to provide for concealed households; the second is the reduction in requirements arising from the assumption that vacancy rates will reduce from 3.7% to a target 3.0% over the plan period. Student and non-residential populations are locally rather than regionally significant.

4.18. With regard to concealed households we accept that to some extent this is a reflection of the current affordability problem which will be addressed by the significant increase in provision proposed in this draft strategy revision. The work on affordable housing by the Cambridge Centre\(^{101}\) identified some 5,300 such households as part of a “backlog of need” of over 29,500. However, it was explained at the examination\(^{102}\) that the national and sub-regional household forecasts incorporate assumptions about the number of currently concealed households which may form in the future. From what we heard we are unconvinced that an additional allowance should be made for what is a relatively small number against the overall regional provision. Furthermore, the housing market assessments currently being undertaken will identify affordable housing needs at local level and, in due course, inform a review of the draft strategy.

4.19. A certain element of vacancy in the housing stock is inevitable although it is clearly a desirable objective to make more effective use of the existing stock. Policy initiatives justifiably seek to reduce existing levels but the actual figure chosen, 3.0%, as reflected in Policy 17, appears to be somewhat aspirational with no clear mechanism for its achievement. Indeed, there are some counter-indications such as the high rates of vacancy in new build flats in the centres of Nottingham and Leicester. Second home ownership, although not strictly vacancy, is not measured either. Consequently, we are concerned that to adjust the housing provision downwards on the assumption that current policies on reducing vacancies will be successful risks under-provision; it might be termed “predict and not provide”. As stated in paragraph 3.1.18 of the draft strategy it is a matter for monitoring. Therefore we do not consider it appropriate to assume a reduction in the average regional vacancy rates in the calculation of housing requirements.

**The presentation of the housing provision figures**

4.20. A number of other aspects arose during the examination which relate to the presentation of housing figures in the draft strategy and the wording of Policy 14. These are:

   a. the inclusion of figures as annual averages over the whole plan period;

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\(^{100}\) The Home Builders’ Federation and others.

\(^{101}\) Core document HOU30.

\(^{102}\) By Dr Bob Garland on behalf of the Department for Communities and Local Government (DCLG).
b. the absence of a housing delivery trajectory;

c. whether greater flexibility would be introduced by the inclusion of figures only at housing market area level especially where there are joint working arrangements in place or might include indicative figures pending further work on sustainable urban extensions;

d. the statistical allowance for growth points;

e. the inclusion of the bulleted points at the end of the policy pointing the way to future reviews; and

f. the consideration of social and community aspirations.

4.21. a. **Annual average figures.** These figures are net of demolitions\(^{103}\) although this is not clearly stated. This approach is useful for monitoring linked to the annual monitoring report but it does not fully accord with national guidance\(^{104}\) because it does not give a clear indication of the overall provision in the plan period as a whole\(^{105}\). Obviously it is possible to multiply these figures by 25 to calculate the total provision for each local planning authority area. See [R4.2] in paragraph 4.26 below.

4.22. Annual rates cannot realistically be constant throughout the plan period. Even if the fact that the demographic profile was not constant were set aside\(^{106}\), the development industry has stressed\(^{107}\) that there is a lead in time of around five years before any significant new development areas, such as planned urban extensions, can be brought to fruition. There are then marketing factors and the physical capacity of the industry to deliver new housing. It seems to us most likely that build rates will be significantly higher in the second decade of the 21st century than it will be in the first. This should be reflected in the way the figures are presented.

4.23. There is already an example in the draft strategy of the way this can be presented and that is in the Milton Keynes South Midlands Sub-Regional Strategy in Part 2, Northamptonshire Policies 1 and 2. These give annual averages for each five years in the plan period with a column for total provision. This format has been approved by the Secretary of State and is subject only to a roll forward and corrective adjustment as part of this partial review of the draft strategy\(^{108}\). It would be possible to apply this format for all districts and housing market areas in the region commencing 2006-11, correcting for actual build rates 2001-6, taken from the trajectories in revised Appendix 2 (HOU43).

4.24. We consider that such a table would provide a more realistic estimate of the actual housing build rates in the future, providing an indication as to when major development might occur\(^{109}\). This can be more clearly related at the local level to the provision of essential infrastructure. It will also provide a more realistic basis for the monitoring of housing delivery linked to trajectories (see below).

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103 This fact might usefully be clarified in the text.
104 PPS3, paragraph 34, Core document PP3.
105 In the draft strategy this would be 25 x 20,418 = 510,450 dwellings.
106 The Office of National Statistics projections show household formation rates peaking around 2016.
107 During discussions on examination Matter 4A.
108 See report Chapter 13.
109 In line with the guidance in paragraph 34 of PPS3, Core document PP3.
4.25. There is another reason why we consider this should be done. It is that the allocations in existing local plans and unitary development plans are properly related to the approved RSS8 whereas the draft strategy revision proposes a significant increase in provision in some areas. Pending the completion of local core strategies the draft strategy will be the main source for calculation of five-year land supply requirements for the purposes of PPS3. An unrealistically high annual provision figure, which can only be achieved over the whole plan period once major development areas come forward, might well result in an artificial shortfall in the apparent five-year supply with the consequences that this might have for the determination of planning applications in the light of the advice in paragraphs 70-72 of PPS3.

4.26. We therefore recommend [R4.2] that Policy 14 and the equivalent policies in the sub-regional chapters of Part 2 should be replaced by a table in the format of that used in the Milton Keynes South Midlands Sub-Regional Strategy. However, we recognise that this will require further work by the Assembly in conjunction with all local planning authorities in the region to express information given in the trajectories in a summary format. This will also need to take account of the 2004 projections110 and our recommendations for adjustments to individual district figures.

4.27. We consider that Table 1 in Appendix 2 provides a very useful summary of the calculations which underpin the figures in Policy 14 and we recommend [R4.3] that it be moved forward in the text of the draft strategy to immediately precede the policy in its amended form. This should show actual completions 2001-6111 and the “residual” required to meet revised figures for 2026 with totals given as well as annual averages. We do not suggest any resetting of the figures at a 2006 base because any under-provision since 2001 would be lost. The revised table should be in the form of Table 2 in the appendix to this chapter.

4.28. b. Delivery trajectories. We consider it to be most important that realistic assumptions should be made about the rate of delivery of new housing over the plan period. This is the essence of the PPS3 approach to delivery and the purpose of producing a housing delivery trajectory. This has only latterly been produced by the Assembly112. As the annual monitoring report113 shows, there has been significant variation in actual build rates from the provision in the approved RSS8114, as there has from the annual averages assumed for this draft strategy revision.

4.29. As for Appendix 2 itself this forms very useful background information but its inclusion within the draft strategy itself is not necessary for the implementation of Policy 14. On the other hand, the guidance in paragraph 34 of PPS3 is that the overall level of housing provision should be “broadly illustrated in a housing delivery trajectory”. We consider that the “when” element of this is important to the delivery of the draft strategy and is sadly lacking therefrom. In particular, there is no indication of the phasing of the new development which will be needed to

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110 See table in paragraph 4.6 above.
111 Any such adjustment should still result in the same total for the period 2001-26.
112 As part of revised Appendix 2, Core document HOU43.
113 Core document REG47.
114 Against which the annual monitoring report has been produced.
meet the overall RSS target. From the information available\textsuperscript{115} it appears that unless more land is identified in the short term for development from 2011 there will be a critical shortfall in land availability regionally. It must be made clear how this is to be addressed. We recommend [R4.4] the inclusion of a regional trajectory as a replacement for the summary tables in Appendix 2. Trajectories for each housing market area should be made available separately as part of the evidence base.

4.30. We agree with the criticism\textsuperscript{116} of the detailed housing market area/district trajectories in Core document HOU43 that assumptions about planned development and future capacity appear to be largely based on existing (PPG3) local plans and capacity studies. It also appears that many may have included allowances for windfalls which do not accord with PPS3 advice – that is a matter for resolution through local examinations. Furthermore, as most will not have been subject to sustainability appraisal, existing allocations will need to be subject to re-appraisal as part of the local planning process. This will include the detailed consideration and consultation at local level of the most sustainable way to achieve the district housing requirements of draft strategy Policy 14. That may significantly alter the picture. This is another reason why we consider that the summary tables in Appendix 2 of the draft strategy should be removed.

4.31. c. Flexibility. The inclusion in Policy 14 of housing provision figures for each local authority area, grouped under housing market areas, fully accords with the guidance in paragraph 34 of PPS3 as well as with paragraph 1.5 of PPS11. However, the latter advice also allows for figures to be given for a functional housing market area where joint development plan documents are to be prepared.

4.32. There is little difficulty where housing provision within a local planning authority is centred on a settlement which, even with any urban extensions required to meet draft strategy requirements, is entirely contained within that administrative district. However, given the focus of the strategy in Policy 4 on development in the principal urban areas, combined with the sequential approach of Policy 2, sustainable urban extensions will be necessary in several locations which will extend the built-up area into adjoining administrative districts. As set out in the Housing Justification Paper\textsuperscript{117} assumptions have had to be made, firstly about urban capacity, and secondly how much development will take place in each district adjoining the principal urban area.

4.33. At the examination we explored various ways in which this might best be handled. In particular, we had regard to the approach taken in the Milton Keynes South Midlands Sub-Regional Strategy which has an asterisk against the provision for Corby and Northampton linking to a footnote which explains that these figures include sustainable urban extensions which may extend across local authority boundaries. To varying degrees this is the situation which applies for each of the five principal urban areas as named (by housing market area) in the last part of draft strategy Policy 18. That policy expects joint working to manage cross-boundary housing land release and particularly encourages the preparation of joint local core strategies.

\textsuperscript{115} In Core document HOU43.
\textsuperscript{116} By Professor David Lock and others during discussion of Matter 4A.
\textsuperscript{117} Core document HOU24.
4.34. We agree that the most sensible and rational approach to the planning of housing land release in these areas is through the preparation of joint core strategies. Furthermore, joint committee arrangements, as we heard have been established in Northampton, are a key to successful implementation of a co-ordinated growth programme. However, we recognise that there can be political sensitivities and unfortunately in some instances “receiving” authorities\textsuperscript{118} can frustrate the delivery of much needed housing. Joint working between officers should always be expected in these situations and, in our opinion, is no more than good professional practice\textsuperscript{119}. The reference to this in Policy 18, although harmless, is of little practical force.

4.35. The difficulty is that the Assembly has no direct power to ensure that local planning authorities work together to further the strategy. However, the Secretary of State does have the power to intervene in the local development scheme process and can direct under s.15(4) of the Planning and Compulsory Purchase Act 2004 that joint core strategies be prepared. We were advised that the Government Office took a strong line with the West Northamptonshire authorities to achieve this for the Northampton Implementation Area and we were disappointed by their less than enthusiastic reaction at the examination to the suggestion that they might do the same for the other areas named in Policy 18.

4.36. Unfortunately it may well be the case that by the time this report has been released the current revisions to the local development schemes will have been approved without provision for joint core strategies or other joint development plan documents aimed at housing delivery. Nevertheless, we recommend [R4.5] that the wording in Policy 18 should be strengthened to say that joint development plan documents in the named areas will be expected. This will give a clear signal for future reviews of the local development schemes and may facilitate the preparation of, for example, joint site allocation development plan documents or area action plans.

4.37. In the absence of joint core strategies the draft strategy must set a clear policy context for the provision of housing not only in overall numerical terms but also in terms of distribution in accordance with the key spatial elements of the draft strategy which seek to achieve a more sustainable pattern of development than hitherto. This becomes especially important when considering the balance of development between the principal urban areas and elsewhere.

4.38. There is little doubt in our mind that housing market areas represent the most appropriate units for the planning of housing provision at the regional level. The housing market assessments currently being prepared will examine housing needs in depth at this level\textsuperscript{120}. It is made clear in paragraph 1.5 of PPS11 that regional spatial strategies should focus on housing provision which is of regional or sub-regional significance and paragraph 1.17 advises that it should be no more specific than to indicate broad locations for development. It is not appropriate at regional level to make choices between sites for development yet, as indicated above, those choices can determine the district housing figures. The

\textsuperscript{118} This is the term used in the footnote to MKSM Northamptonshire SRS Policy 1.
\textsuperscript{119} See also paragraph 14.21 of this report.
\textsuperscript{120} The National Housing Federation support planning for affordable housing by housing market areas.
danger is that the inter-district distribution implicit in those figures will preclude and predetermine the options available for consideration through the local process when detailed evidence on such matters as the effect on environmental capacity can be examined. For example, we consider that it is the function of local core strategy examinations to examine alternative sites for sustainable urban extensions and we do not support attempts to short-circuit the process by naming sites (such as Clifton) in the draft strategy.

4.39. The position we faced at the examination was that work on strategic housing land availability assessments for each of the three cities121 became available only very shortly before the opening or even during the examination itself and differences over their interpretation were not fully resolved. As a result, we do not have the confidence to say with any certainty that the figures given in Three Cities SRS Policy 4 for the quantum of housing provision in sustainable urban extensions into the districts adjoining Derby, Leicester and Nottingham is correct. The figures can be regarded as no more than provisional pending the completion of further work including the sub-regional study for the Nottingham housing market area in accordance with recommendation [R14.5].

4.40. Both the quantum of any sustainable urban extensions to the principal urban areas and their location, i.e. extension into which district, affects the provision figures in Policy 14 and also the “when” element of housing delivery. Despite the uncertainties identified above the total amount of development attributed to each principal urban area is determined by the draft strategy. The “non-PUA” element for each district is to meet local need and will not be affected by any subsequent decision about the precise location or size of urban extension.

4.41. We recognise that in the absence of agreement to proceed on the basis of joint local core strategies the authorities surrounding the principal urban area will be proceeding with the preparation of development plan documents as set out in their local development schemes. This process should not be delayed further. However, any flexibility which might be introduced should not go so far as to alter the fundamental balance between additional housing which “belongs” to the principal urban area and effectively needs to be “ring-fenced” and other provision to meet the needs of smaller settlements outside the principal urban area122.

4.42. There is no difficulty with the two Northamptonshire housing market areas because joint core strategies are being prepared. In such a situation PPS11, paragraph 1.5 allows housing figures to be given at housing market area level leaving the division between districts for resolution within the local development framework process. We agree123 that this should be done in Northamptonshire both in Policy 14 and in the revised Milton Keynes South Midlands Sub-Regional Strategy, Northamptonshire Policy 1. It avoids the need for the “asterisk approach”.

4.43. Otherwise, we consider that the best way forward and to facilitate the preparation of local core strategies is to accept the underlying assumptions which have led to the figures given for those districts which will be accommodating sustainable urban extensions to the principal urban

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121 These are Core documents: HOU48 (Leicester); HOU55 (Derby) and RES86 (Nottingham).
122 Otherwise referred to as the “PUA/non-PUA split”.
123 With Northamptonshire County Council.
areas but **we recommend** [R4.6] that the total figure for the sustainable urban extension, when complete, should be given, rather than simply expressed as an annual average provision within each district figure. This will link to the trajectory in a new Appendix 2 and recognise the fact that there should be no artificial cut-off in 2026. In some cases, development may need to continue beyond that date to achieve true sustainability, in terms of the provision of essential services and infrastructure.

4.44. In this way we envisage that the individual figures for districts around the principal urban areas will be as set out in the draft strategy, unless and until more detailed work as part of the local development framework process is able to establish that the balance is wrong and/or that a different size or form of development would be more sustainable than the assumptions which have informed the draft strategy.

4.45. d. **Growth points.** These have been considered in more detail in terms of the relationship with the spatial strategy in Chapter 3 and in the relevant sub-area chapters. All that it is necessary to say here is that we are satisfied that the overall provision for housing in those areas for which growth point proposals have been put forward is sufficient to accommodate the growth point proposals approved by the Secretary of State. The programme should assist in the provision of infrastructure, including public transport networks funding, to meet the objectives of the draft strategy. The merits of individual proposals are considered in the relevant sub-area chapters.

4.46. e. **The concluding bullet points.** We accept the point made by the Assembly that the assessment of the impacts of the proposed housing provision on the various factors set out in the bullet points, which they described as “pinch points”, can only go so far at regional level; that more detailed assessment will be required at local level through the local development framework process. The Assembly clearly attaches some importance to this section of Policy 14 as a kind of safeguard. It covers some of the reservations arising from the sustainability appraisal of the draft strategy and other concerns124.

4.47. However, as worded this section of Policy 14 simply states what the Assembly will take into account in future reviews as a result of monitoring. It is an informative which is misplaced within a policy box. An option would be to strengthen the section to give clear guidance for the preparation of local development frameworks. We do not favour that as it would detract from the imperative of delivering the housing numbers included in the policy. **We recommend** [R4.7] the deletion from the policy of the final paragraph commencing “Housing provision will be monitored annually …” and the bullet points which follow and their inclusion as supporting text.

4.48. f. **Social and community aspirations.** It is difficult in a document which is intended to take a broad brush strategic view for all aspects to be covered in as much detail as some would like. This is true of a large part of the detail of the social and community aspirations125. We consider that there is adequate recognition in the draft strategy of the need for social and community considerations to be taken into account and, by and large,

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124 Expressed by the East Midlands Environment Link and others.
125 Written and oral evidence of the Brethren’s Gospel Trusts.
these are better handled as part of the local planning process. The draft strategy provides an adequate context.

**The distribution of housing across the region (by sub-area)**

4.49. Although there was discussion\(^{126}\) at the examination about the match between the objectives of the draft strategy and the distribution of housing between each of the sub-areas\(^{127}\), the Assembly stressed that in the same way as there is no overall regional control total there are no sub-area totals. Indeed, Policy 14 gives figures only at the individual local planning authority level grouped by housing market area. Although we do not see any added value in the inclusion of sub-area totals, the housing market area is, by definition, the most suitable for planning purposes and our recommendation \([R4.1]\) in paragraph 4.6 above includes figures at that level.

**The relationship between housing and employment provision**

4.50. There was an undercurrent of concern throughout the examination at the potential weakness of a strategy which does not set out region-wide employment guideline requirements, or more specifically give guidance for the local development framework process. This is discussed in more detail in the next chapter.

4.51. As stressed by *emda* there should be a close alignment between employment and housing. Also, as some\(^{128}\) rightly point out, there is a risk that an imbalance will result in increased journeys to work directly counter to the objectives of the draft strategy and resulting in an increase in CO₂ emissions. However, we recognise the difficulty in a rapidly evolving economy to identify a clear relationship between the number of jobs and the land requirements to accommodate those jobs; many new jobs do not require land.

4.52. *emda* have carried out a study of commuter patterns which identifies significant flows across the regional boundary, especially towards Sheffield and Peterborough. They identify the economic function of commuting in terms of the efficient functioning of local labour markets.

4.53. As we have noted in Chapter 3, the fundamental strategy of urban concentration is supported. The policies in the draft strategy provide for employment provision to go hand in hand with housing and will facilitate this in sustainable urban extensions which should provide for employment and be large enough in scale to allow for viable public transport networks. The key to this must rest with local planning.

4.54. There are two sub-areas in particular where there is concern that employment provision may not balance housing provision or conversely, that housing supply might act as a constraint on employment development opportunities through a lack of local labour supply. These are the northern and eastern sub-areas. In the former the focus is on urban regeneration to diversify the economy although housing development is seen as an integral part of that. This is coupled with below trend provision in the Sheffield/Rotherham housing market area to reduce commuting flows. We agree that housing is but one element of a co-ordinated programme of activity and this need not require a large

\(^{126}\) Of Matter 4B.

\(^{127}\) Draft strategy paragraph 3.1.4.

\(^{128}\) Council for the Protection of Rural England (CPRE) and East Midlands Environment Link.
number of additional houses\textsuperscript{129}. Our overall view on the northern sub-area is that careful monitoring will be required at local level to ensure that housing-led regeneration does not imbalance the local economy such as to result in unsustainable patterns of out-commuting.

4.55. The eastern sub-area (Lincolnshire) is primarily rural in character and contains one of the faster economic growth zones along the A1 corridor. \textit{emda} question whether the fundamental strategy of urban concentration does enough to support the sustainability of self-contained rural settlements, a concern echoed by the development industry and, to some extent, by Boston and East and West Lindsey councils. However, we agree with the Assembly that any re-adjustment to provide more housing in this sub-area would exacerbate trends which would threaten the role of the three cities as the regional economic driver. The total draft strategy provision in parts of the sub-area may be below trend but generally it still represents an increase over the approved RSS8 provision. We are satisfied that there are good policy reasons for the approach taken in the draft strategy which seeks to achieve a more sustainable pattern of development through its focus on the development of Lincoln. There is no clear evidence that the sustainability of rural settlements will be undermined by the draft strategy. Moreover, as we discuss in more detail in Chapter 17, concerns about flood risk in Coastal Lincolnshire suggest a cautious approach to additional provision pending further work.

4.56. We consider housing provision in the sub-areas in more detail in Chapters 13-18.

**Policy 15 – Affordable Housing**

4.57. We do not underestimate the importance of the draft strategy in helping to meet the Government’s strategic housing policy objectives\textsuperscript{130}. To that end the guidance in paragraph 28 of the PPS is that the spatial strategy should set out the regional approach to addressing affordable housing needs, including the affordable housing target for the region and for each housing market area. The Assembly commissioned a study by the Cambridge Centre for Housing and Planning Research\textsuperscript{131} to meet that requirement. The percentage “targets” for the provision of affordable housing given in Policy 15, for each housing market area and for the region, are derived directly from the Cambridge recommendations\textsuperscript{132}.

**Methodology**

4.58. We consider that the Holman’s “net stock” method is appropriate at the strategic level and in order to provide a figure in the very limited timescale available without local survey information. However, there is also a number of important caveats to the method, not least in our view that it does not model changes in the pattern of social tenure in the future, particularly the role of intermediate tenure\textsuperscript{133}, and cannot properly estimate intermediate market requirements at sub-regional level. For this reason the study stresses that the figures provided should only be

\textsuperscript{129} Oral evidence of Mr Richard Bryant of Chesterfield Borough Council.
\textsuperscript{130} As set out in PPS3, paragraph 9.
\textsuperscript{131} An Approach to Affordable Housing to inform the East Midlands Regional Plan. Final report. August 2006, Core document HOU30
\textsuperscript{132} Table 8.4.
\textsuperscript{133} As stated at the examination by Ms Margaret Allen on behalf of the Housing Corporation.
regarded as interim, that is pending more detailed local studies being undertaken in housing market area assessments.

4.59. These important caveats lead us to doubt the value of including a policy which does no more than to provide interim figures and which will be replaced in a relatively short period of time by the more sophisticated and more useful data coming from the housing market area assessment work. We heard that several of these have been completed and all show a need for higher levels of affordable housing than the Cambridge Study.

**Delivery**

4.60. The interim nature of the policy is combined with the fact that the targets “do not represent a maximum” but they represent, in absolute numbers, a 65% increase in the anticipated annual provision compared to the approved RSS8. Yet the Annual Monitoring Report for 2005/6 shows that, despite the fact that overall housing provision has exceeded targets, the provision of affordable housing has fallen well below the Policy 18 figure at only 2,079 dwellings in 2005/6. Of course, it may reasonably be assumed that the large-scale housing developments envisaged in the draft strategy, especially in sustainable urban extensions, may achieve significantly higher numbers of affordable homes through the use of s.106 obligations than would the accumulation of smaller sites (subject to thresholds) but there is a limit to the proportion not only in terms of viability but to maintain the concept of mixed and balanced, sustainable communities. Limitations on funding for social rented schemes and reliance on smaller sites may well be a reason for the poor delivery of affordable housing in recent years but Housing Corporation investment is rising. Recently, since the close of the examination, the Government have signalled initiatives to increase affordable housing provision in the Housing Green Paper, including the possibility of direct local authority building. The regional allocation for 2007/8-2010/11 has recently been announced. We hope this enables the affordable housing targets in the region to be met.

**Numbers or percentages?**

4.61. As it states in the policy itself, the percentage figures relate to those given in Policy 14 such that they will yield the actual number of affordable dwellings assessed in the study as required over the plan period. Thus, the overall figure of 32% is 6,539, i.e. 32% of 20,418.

4.62. We have concluded that there should be significant additional housing provision in the region which will require an early review of the strategy, but even the adjustments to the Policy 14 figures required to reflect the 2004 projections present difficulties because of the way the Policy 15 figures are expressed as percentages. Furthermore, as the total number of houses to be built in each housing market area increases the less of a need there would be to artificially constrain provision of affordable housing as has been done in the Cambridge study. Conversely, where there remains a strong policy reason to constrain development

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134 RSS8 Policy 18 gives a monitoring indicator of 3,950 dwellings which equates with 25% of the annual provision.
135 Core document REG53.
136 Pre-examination statement of the Housing Corporation.
138 Parliamentary statement 16 October 2007 by Mrs Yvette Cooper, Housing Minister.
139 Table 8.4 in Core document HOU30 refers.
below the figure in Policy 14, as in Coastal Lincolnshire, that should not be at the expense of affordable housing provision.

4.63. There is another factor which leads us to the view that a “numbers approach” is preferable. It relates to the potential misuse of the policy as an interim measure to seek to negotiate provision on individual sites up to the stated percentages. That is not the purpose of the policy, nor should it be interpreted as a guideline for local planning authorities to translate into policies in development plan documents. It is clearly the intention that the results of the housing market area assessment work will inform the local development framework process and will supersede Policy 15. In view of the timescales we consider that Policy 15 as drafted is of little practical value.

4.64. For these reasons, we favour the inclusion of absolute numbers over percentages with it being stressed that these are for monitoring purposes, as in the approved RSS. If it was not for the guidance in paragraph 28 of PPS3 we would recommend the deletion of Policy 15. As it is, we recommend [R4.8] that the percentages be replaced by numbers which should be recalculated in the light of our recommendations on the Policy 14 figures.

Social rented and intermediate housing

4.65. An allied point is that despite the value of a split between social and intermediate housing to ensure that the social rented sector is not “squeezed” by intermediate tenures\(^{140}\), the admitted lack of robustness to support the figures given for intermediate housing does not justify the inclusion of a separate figure because it fails the test of being derived from a robust and credible evidence base. This is a matter for local development frameworks to be justified from the strategic housing market area assessments\(^ {141}\). Therefore, we recommend [R4.9] the inclusion of a single figure for each housing market area as an overall, and interim, target for monitoring purposes.

A mini-review?

4.66. The suggestion\(^{142}\) that a mini-review of the policy on affordable housing be carried out when the results of the housing market assessments are known is, to our minds, a reflection of the limited value of Policy 15 and an indication that the data base to support it is inadequate. But we do not support the idea of a mini-review partly because of the complex procedures involved. Instead we favour integration with any wider review which may be carried out to accommodate an increase in overall housing provision.

Rural areas

4.67. We recognise the acute problems faced in the provision of affordable housing in the smaller settlements in the more rural parts of the region. However, the data is not currently available to provide a separate figure as a target for the delivery of affordable housing in rural areas\(^{143}\) in line with the advice in paragraph 30 of PPS3. We consider this

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\(^{140}\) A concern raised by Shelter.\(^{141}\) As is made clear in PPS3, paragraph 29.\(^{142}\) By the Government Office.\(^{143}\) Confirmed at the examination by the Cambridge Centre for Housing and Planning Research on behalf of the Assembly.
to be an issue which requires further work but in the meantime we consider that the supporting text in paragraph 3.1.11 is tantamount to a policy which we support with the exception of the seventh bullet point which states that shared ownership might be considered “rather than social housing”; there is no clear basis for this preference. Indeed a report by the Joseph Rowntree Foundation indicates that shared ownership is of equal importance to (not more important than) social rented housing.\textsuperscript{144}

4.68. We therefore recommend [R4.10] the insertion of a new policy on Affordable Rural Housing to follow Policy 15 based on (and replacing all but the first two sentences of) paragraph 3.1.11. It should commence with the words:

“Local authorities and housing providers should use all available mechanisms to secure affordable housing in rural areas by:”

and continue with the bullet points in paragraph 3.1.11 except that in the seventh bullet point the words “rather than” be replaced by “as well as”.

**Policy 16 – Housing for Gypsies**

**National policy and the draft strategy**

4.69. Section 225 of the Housing Act 2004 requires local authorities in England to undertake a Gypsy and Traveller accommodation strategy informed by a “Gypsy and Traveller Accommodation Assessment”. This assessment is also the starting point of the statutory planning process as set out in the “Overview” given in ODPM Circular 1/2006 and reproduced below.

4.70. As can be seen from the diagram, regional spatial strategies should identify the number of pitches required in the area of each local planning authority (but not their location) in the light of the accommodation assessments and a strategic view of needs across the region.\textsuperscript{145} Pitch numbers may be identified by sub-regional area if joint development plan documents are to be produced.\textsuperscript{146}

4.71. None of the requisite assessments were complete when the draft strategy was prepared and so interim figures based on caravan count data

\textsuperscript{144} Paragraph 47 of the Cambridge report, Core document HOU30.

\textsuperscript{145} See also paragraph 23 of Circular 1/2006, Core document GEN10.

\textsuperscript{146} Paragraph 26 of Circular 1/2006.
and consultation with local authorities were put in the draft strategy instead. They are to be found at Appendix 3. Qualification of the figures is given in Policy 16 which says, inter alia, that they will be “superseded by pitch requirements derived from Gypsy and Traveller Accommodation Assessments”.

4.72. Justification of the draft strategy’s approach is given\textsuperscript{147} by reference to paragraph 59 of the draft practice guidance on Accommodation Assessments\textsuperscript{148} which accepts that “caravan count data can provide a proxy for the amount of unmet need for authorised pitches”. However this paragraph goes on to describe this proxy as a crude one, because it “says nothing of the number of households or individuals in those caravans, the adequacy of their accommodation, their needs, their preferences, their travelling patterns or their reasons for living where they do”. Moreover, the count itself says nothing about cross boundary movements or the desirability of meeting the need of one local authority area in another.

4.73. We agree\textsuperscript{149} that caravan count figures may understate need, due to present overcrowding and undesirable sharing. Moreover, understatement may also arise from the loss of pitches for Gypsies and Travellers by their being taken by migrant workers from Eastern Europe\textsuperscript{150}.

4.74. By the time of the examination, assessments in Leicestershire were complete, as they were for Rutland. Those for Northamptonshire are expected to be completed this year (2007); others seem likely to follow later\textsuperscript{151}.

4.75. Where caravan count figures in the area of any given local authority are greater than the number of authorised pitches available then we draw the obvious corollary that more authorised pitches are needed in that area. Only if there is clear evidence to the contrary, such as evidence of the people concerned needing accommodation in another area, should this obvious corollary be controverted. In such circumstances precise definition of the numbers concerned is of little immediate importance. What is important is that more pitches are allowed or provided.

4.76. Nevertheless, Government policy does require numbers in the preparation of local development documents. We do not consider that the best way forward is through an ad hoc partial review\textsuperscript{152}. Such a procedure is inevitably cumbersome and time consuming and the preparation of local development documents should not have to wait for it. Rather, we support the approach of the draft strategy in presenting interim figures which are to be replaced by those derived from the accommodation assessments as soon as they are available and have been considered and adapted as necessary by the regional planning body. This approach will enable local development documents to take in the better figures as they are available while permitting general conformity with the regional spatial

\textsuperscript{147} Pre-examination Statement of the Assembly.
\textsuperscript{149} With the oral evidence of Ms Rachel Newton on behalf of Shelter and of Ms Siobhan Spencer on behalf of the East Midlands Gypsy and Traveller Forum.
\textsuperscript{150} Oral evidence of Ms Spencer.
\textsuperscript{151} Oral evidence of Mr Andrew Pritchard on behalf of the Assembly.
\textsuperscript{152} As advocated in pre-examination statements by the Government Office and the East Midlands Gypsy and Traveller Forum.
strategy. If no assessment derived figures are available, the general conformity may be had by repeating the approach of the regional strategy. We concur with the draft strategy in considering the interim figures as minima.

4.77. We commend, as elsewhere in this chapter, the collaboration of local planning authorities in preparing either joint core strategies in their local development frameworks or jointly preparing each core strategy.

4.78. We therefore recommend [R4.11] that the accommodation assessment figures for the Leicestershire and Rutland authorities should be substituted for the corresponding interim figures in Appendix 3 of the draft plan, but that in other respects plan Policy 16 and the rest of Appendix 3 be confirmed.

Policy 17 – Targets for the efficient use of land

Previously-developed land

4.79. The target of 60% included in the first part of this policy for the proportion of additional dwellings on previously-developed land is the same as the national target. There is thus some reason to question what value this serves. Yet, the advice in paragraph 42 of PPS3 is that the regional spatial strategy should set a regional target to contribute towards the national target taking into account evidence from strategic housing land availability assessments and sustainability appraisals. There is no requirement for sub-regional targets.

4.80. The approved RSS8 sets a target of 60% to be reached by 2021 but the Annual Monitoring Report indicates that the regional average was over 67% in 2005/6 although, of course, there is a very wide variation within this\(^\text{153}\). This leads to the suggestion\(^\text{154}\) that the target is not sufficiently challenging and should be stepped up to 65%. But we have reservations about the value of including a “policy” of this kind which can do no more than set a direction of travel. It reflects national policy but it has to be recognised not only that the potential to recycle urban land is limited, if not finite, but that the significant increase in the pace of housing development envisaged by the draft strategy will inevitably involve a greater proportion of development on greenfield sites. In that context we consider it to be a challenging target.

4.81. How is even this target to be achieved? Is there a need for a standalone policy? In considering the fundamental strategy for the region, we are recommending the insertion (into Policy 4 – see Chapter 3, [R3.1]) of a new sub-paragraph stating a strong preference of the use of previously developed land as the location for all forms of development. The target for the use of previously developed land for housing is a development of a sub-set of this policy and in terms of presentation should be set following it.

Vacancy rates

4.82. The second part of the policy, setting a target for vacancy rates, does not have an equivalent in approved regional spatial strategies. We have indicated in paragraph 4.19 above that it should not be assumed for the purposes of calculating housing requirements. There are relatively

\(^{153}\) 5\(^{th}\) East Midlands RSS Annual Monitoring Report 2005/6 Table 3.11, Core document REG53.

\(^{154}\) From CPRE.
limited opportunities, mainly through local authority empty property strategies, to influence vacancy. Such a target can be no more than aspirational. We are not convinced that there is any clear means to implement it nor is there any indication of the timescale although the implication is by 2026.

4.83. We therefore **recommend** [R4.12] that the first bullet point be subsumed into Policy 4 and the remainder of Policy 17 be deleted.

**Density**

4.84. Clearly the density of development is related to the efficient use of land. There is no policy in the draft strategy which sets a minimum density for new housing development or an overall target although reference is made to the advice in the then draft PPS3 in paragraphs 3.1.19 and 3.1.20. The Assembly explained\(^{155}\) that they had used an assumption of 40 dwellings per hectare to calculate likely land take. We accept that this is necessary to assess certain impacts such as the likely proportion of development which will require greenfield locations and urban extensions.

4.85. National guidance\(^ {156}\) does not now require regional density targets although it does require housing density policies including any target. The focus is on the development of local housing density policies in the context of a national indicative minimum of 30 dwellings per hectare. We consider that national guidance is sufficiently clear guidance for the preparation of development plan documents and there would be no added value from the inclusion of a policy in the draft strategy which would simply repeat national guidance. Nor would anything be achieved by a statement that a density of 40 dwellings per hectare had been used in calculations. What is needed is an updated text. **We recommend** [R4.13] the deletion of paragraph 3.1.20 and the replacement of the first sentence in paragraph 3.1.19 by the following:

"PPS3 indicates that a density of 30 dwellings per hectare (net) should be used as a national indicative minimum to guide policy development and decision making until local density policies are in place."

**Policy 18 – Cross-boundary or inter-regional**

4.86. There was a wide consensus of opinion at the examination that an addition should be made to the areas identified under the bullet points in the first part of this policy to add reference to the need for cross-boundary\(^ {157}\) working between South Derbyshire and East Staffordshire, specifically to take account of the Growth Point status of Burton-on-Trent and the proximity of that town to Swadlincote. The Assembly indicated that the correct format would be “Derby HMA and the West Midlands” and **we recommend** [R4.14] that such an addition be made to the policy.

4.87. Other suggestions made included Rugby/Daventry and Hinckley/Nuneaton. However, from what we heard it would not seem that there is the same likelihood within the terms of this draft strategy for the

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\(^ {155}\) During the discussion on Matter 4B.

\(^ {156}\) PPS3, paragraphs 45 and 46.

\(^ {157}\) A misnomer has crept into Policy 18, cross-regional, it should of course read “cross-boundary” or “inter-regional working”.

Chapter 4 – Housing
most sustainable development options to cross the regional boundary. This will need to be kept under review.

**Recommendations**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
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<tbody>
<tr>
<td>R4.1</td>
<td>4.6.</td>
<td>That the relevant local planning authorities within each housing market area should agree with the Assembly the distribution of housing provision between their authorities to total the 2004 adjusted figures as shown in the table below. When agreed the revised figures should be shown in Policy 14 and relevant sub-area policies. This table takes account of the additional policy interventions which we recommend in this report, as explained in the table footnotes a-f.</td>
</tr>
<tr>
<td>R4.2</td>
<td>4.26.</td>
<td>That Policy 14 and the equivalent policies in the sub-regional chapters of part 2 should be replaced by a table in the format of that used in the Milton Keynes South Midlands sub-regional strategy.</td>
</tr>
<tr>
<td>R4.3</td>
<td>4.27.</td>
<td>That Table 1 in Appendix 2 be moved forward in the text of the draft strategy to immediately precede the Policy 14 in its amended form. This should show actual completions 2001-6 and the “residual” required to meet revised figures for 2026 with totals given as well as annual averages. We do not suggest any resetting of the figures at a 2006 base because any under-provision since 2001 would be lost.</td>
</tr>
<tr>
<td>R4.4</td>
<td>4.29.</td>
<td>The inclusion of a regional trajectory as a replacement for the summary tables in Appendix 2 which should be made available separately as part of the evidence base.</td>
</tr>
<tr>
<td>R4.5</td>
<td>4.36.</td>
<td>That the wording in Policy 18 should be strengthened to say that joint development plan documents in the named areas will be expected.</td>
</tr>
<tr>
<td>R4.6</td>
<td>4.43.</td>
<td>That the total figure for the sustainable urban extension, when complete, should be given, rather than simply expressed as an annual average provision within each district figure.</td>
</tr>
<tr>
<td>R4.7</td>
<td>4.47.</td>
<td>The deletion from Policy 14 of the final paragraph commencing “Housing provision will be monitored annually ....” and the bullet points which follow and their inclusion as supporting text.</td>
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<tr>
<td>R4.8</td>
<td>4.64.</td>
<td>That the percentages be replaced by numbers which should be recalculated in the light of our recommendations on the</td>
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<tr>
<td>R4.9</td>
<td>4.65.</td>
<td>Policy 14 figures.</td>
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<td>That the correct format would be &quot;Derby HMA and the West Midlands” and that such an addition be made to Policy 18.</td>
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## Appendices

### TABLE 1: CALCULATION OF 2004 TREND ADJUSTED HOUSING PROVISION AT HMA LEVEL (Excluding Northants)

<table>
<thead>
<tr>
<th>District</th>
<th>CLG 2004 Trend Projection-Annual Rate (Households)(a)</th>
<th>Net Policy Impact % +/- CLG 2003 Trend Projection (b)</th>
<th>Amended provision (2001-26)</th>
<th>Residual Requirement 2006-26(g)</th>
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<td>Amended provision (2001-26)</td>
<td>Residual Requirement 2006-26(g)</td>
</tr>
<tr>
<td></td>
<td>Trend (c)</td>
<td>Vacancy (d)</td>
<td>Total Provision 2001-26 (e)</td>
<td>Completions 2001-06 (f)</td>
</tr>
<tr>
<td>Central Lincolnshire HMA</td>
<td>1,877</td>
<td>+1.4%</td>
<td>1,903 82</td>
<td>49,625 8906</td>
</tr>
<tr>
<td>Coastal Lincolnshire HMA</td>
<td>1,492</td>
<td>-36.1%</td>
<td>953 81</td>
<td>25,860 4747</td>
</tr>
<tr>
<td>Peterborough Partial HMA</td>
<td>1,529</td>
<td>-12.7%</td>
<td>1,335 15</td>
<td>33,750 7,394</td>
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<tr>
<td>Nottingham Outer HMA</td>
<td>1,502</td>
<td>+11.9%</td>
<td>1,681 52</td>
<td>43,325 6,731</td>
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<tr>
<td>Nottingham Core HMA</td>
<td>2,499</td>
<td>+11.9%</td>
<td>2,796 21</td>
<td>70,425 10,313</td>
</tr>
<tr>
<td>Northern (Sheffield/Rotherham) HMA</td>
<td>1,548</td>
<td>-8.5%</td>
<td>1,416 52</td>
<td>36,700 6,266</td>
</tr>
<tr>
<td>Peak, Dales &amp; Park HMA</td>
<td>649</td>
<td>-32.5%</td>
<td>438 28</td>
<td>11,650 2,488</td>
</tr>
<tr>
<td>Derby HMA</td>
<td>2,009</td>
<td>-17.8%</td>
<td>1,651 139</td>
<td>44,750 8,244</td>
</tr>
<tr>
<td>Leicester &amp; Leicestershire HMA</td>
<td>3,791</td>
<td>-0.5%</td>
<td>3,772 73</td>
<td>96,125 16,185</td>
</tr>
<tr>
<td>Region ex Northants (Totals)(h)</td>
<td>16,896</td>
<td>16,488</td>
<td>412,210 71,274</td>
<td>17,048</td>
</tr>
</tbody>
</table>

### UNADJUSTED FIGURES FOR NORTHAMPTONSHIRE (Note j.)

<table>
<thead>
<tr>
<th>District</th>
<th>(Households)</th>
<th>Trend (c)</th>
<th>Vacancy (d)</th>
<th>Total Provision 2001-26 (e)</th>
<th>Completions 2001-06 (f)</th>
<th>Annual Residual Provision (dpa) 2006-26</th>
<th>Total (rounded) Residual Provision 2006-26</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northampton (West Northants) HMA</td>
<td>(1,652)</td>
<td>2,485</td>
<td>62,125</td>
<td>9,877</td>
<td>2,613</td>
<td>52,250</td>
<td></td>
</tr>
<tr>
<td>Corby/Kettering/Wellingborough (North Northants) HMA</td>
<td>(1,696)</td>
<td>2,643</td>
<td>66,075</td>
<td>8,190</td>
<td>2,894</td>
<td>57,885</td>
<td></td>
</tr>
<tr>
<td>Northants Total</td>
<td>(3,348)</td>
<td>5,128</td>
<td>128,200</td>
<td>18,067</td>
<td>5,507</td>
<td>110,135</td>
<td></td>
</tr>
<tr>
<td>EAST MIDLANDS REGION –TOTAL(h)</td>
<td>(20,244)</td>
<td>21,616</td>
<td>540,410</td>
<td>89,341</td>
<td>22,555</td>
<td>451,070</td>
<td></td>
</tr>
</tbody>
</table>
EXPLANATORY NOTES FOR TABLE 1

(a) Figures taken from Core Document HOU43 (24th May 2007 version).
(b) Figures taken from Core Document HOU43 Summary Tables Updating Appendix 2 Table 2 (1st August 2007 version).
(c) Calculated by applying the Net Policy Impact to the 2004 CLG Trend Projections.
(d) This figure is as given in the table on page 30 of Core Document HOU43. It is the estimated effect of not assuming any reduction in vacancy rates over the plan period.
(e) Total provision is calculated by adding the figures in columns (c) and (d) and multiplying by 25.
(f) Figures taken from Core Document HOU43 Summary Tables Updating Appendix 2 Table 2 (1st August 2007 version).
(g) Calculated by subtracting the Completions 2001-06 (f) from the Amended Provision (e).
(h) Regional and sub-regional totals calculated by adding together all the HMA figures.
(j) As explained in paragraph 13.20 of this report we have not considered it appropriate to amend the Northamptonshire figures to take account of the 2004 projections. The figures in this part of the table are, therefore, those given in the draft amendment to MKSM Northamptonshire SRS Policy 1. The 2004 household change figures and policy impact are given in brackets for information only.

dpa) Abbreviation for “dwellings per annum”.
Table 2  Housing Market Areas – Summary Table

<table>
<thead>
<tr>
<th>Housing Market Area</th>
<th>DCLG Trend 2004 (hhpa)</th>
<th>Amended Rounded Total 2001-26 (dpa)</th>
<th>Dwellings Built Total 2001-6 (dpa)</th>
<th>Residual requirement 2006-26 Rounded Total (dpa)</th>
<th>+/- - DCLG Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Lincolnshire</td>
<td>1,880</td>
<td>49,625 (1,985)</td>
<td>8906 (1,781)</td>
<td>40,720 (2,036)</td>
<td></td>
</tr>
<tr>
<td>Coastal Lincolnshire</td>
<td>1,490</td>
<td>13,445 (537)</td>
<td>4747 (949)</td>
<td>8,700 (435)</td>
<td></td>
</tr>
<tr>
<td>Peterborough (Partial)</td>
<td>1,530</td>
<td>30,390 (1,215)</td>
<td>7,394 (1,479)</td>
<td>22,995 (1,150)</td>
<td></td>
</tr>
<tr>
<td>N/A/M (Nottingham Outer)</td>
<td>1,500</td>
<td>43,325 (1,733)(^1)</td>
<td>6,731 (1,346)</td>
<td>36,595 (1,830)</td>
<td></td>
</tr>
<tr>
<td>Northern (Sheffield/Rotherham)</td>
<td>1,550</td>
<td>35,700 (1,428)</td>
<td>6,266 (1,253)</td>
<td>29,435 (1,472)</td>
<td></td>
</tr>
<tr>
<td>Peak Dales &amp; Park(^2)</td>
<td>650</td>
<td>12,490 (500)</td>
<td>2,488 (498)</td>
<td>10,000 (500)</td>
<td></td>
</tr>
<tr>
<td>Derby</td>
<td>2,010</td>
<td>44,750 (1,790)</td>
<td>8,244 (1,649)</td>
<td>36,505 (1,825)</td>
<td></td>
</tr>
<tr>
<td>Leicester and Leicestershire</td>
<td>3,790</td>
<td>96,125 (3,845)</td>
<td>16,187 (799)</td>
<td>79,940 (3,997)</td>
<td></td>
</tr>
<tr>
<td>Nottingham Core</td>
<td>2,500</td>
<td>70,425 (2,817)(^1)</td>
<td>10,313 (2,063)</td>
<td>60,110 (3,006)</td>
<td></td>
</tr>
<tr>
<td>Northampton (West Northamptonshire)</td>
<td>(1,652)</td>
<td>62,125 (2,485)</td>
<td>9,877 (1,974)</td>
<td>52,250 (2,613)</td>
<td></td>
</tr>
<tr>
<td>C/K/W (North Northamptonshire)</td>
<td>(1,696)</td>
<td>66,075 (2,643)</td>
<td>8,190 (1,638)</td>
<td>57,885 (2,894)</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>(20,244)</td>
<td>523,675 (20,980)</td>
<td>89,341 (17,868)</td>
<td>435,135 (21,757)</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) Includes any provision for Hucknall which is part of Nottingham Core HMA

\(^2\) PDNPA figures not included in the Regional total – see Policy 14 for details

\(^3\) Excluding provision for Hucknall

\(^4\) Variation in totals due to rounding
Chapter 5: Economic Strategy

Priorities for regeneration; allocation of employment land; strategic distribution uses (logistics); town centres and retailing; rural diversification

Priorities for regeneration

Regeneration — and the spatial context

5.1. The draft strategy shares with the Regional Economic Strategy the aim of becoming “a flourishing region”. The East Midlands is a large, active and diverse region, with 4.3 million people and over 260,000 businesses. It benefits from a geographical location at the heart of England, with strong links to London and the south east and to the northern regions. But it also faces a wide range of challenges – both in urban and in rural areas.

5.2. The Regional Economic Strategy advises that on some measures, the economy of the region is doing well. There are high levels of employment and relatively high levels of economic growth. However, the region still performs less well than the UK average on productivity so there is a particular challenge in raising skill levels so that the region is better placed to enhance economic performance. We note, however, that success is reflected neither across all parts of the region, nor across all sections of society.

5.3. The Regional Economic Strategy also identifies some major global economic drivers which we agree need to be addressed in spatial strategy, including the emergence of the Asian economies, rising energy costs, the impact of climate change, and pressures on communities and localities arising from the unevenness, not just the pace, of change.

5.4. Our understanding of the needs of the economy relates to a theme which we have noted in all aspects of the planning of the region, that is, regeneration in its fullest, holistic sense. In economic terms there is a need for the region’s economy to be reshaped to yield greater productivity and competitiveness in the general interests of the nation, while local economies call for regeneration – some more than others – in the interests of those who live and wish to work there.

5.5. We tested the draft strategy to see the extent to which it provides a spatial context for economic regeneration and is in this and other respects consistent with the Regional Economic Strategy.

The regional economy

5.6. While the strategic locational policies of the draft strategy, if taken together, can be seen to provide a strategic framework for local planning to promote a holistic approach to regeneration in accordance with the Regional Economic Strategy, this is by no means clear to us from our reading of the two policies that expressly refer to the economy, Policies 19

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159 In Chapter 3.
160 Pre-examination statement of the Government Office.
and 20. Policy 19 relates only to the areas where the local economy is lagging and so needs special attention, while Policy 20 is only about employment land, not the needs of the economy generally. Text in the draft strategy, for example at paragraph 3.2.2, well supports the Regional Economic Strategy, but there is no explicit policy doing so. There should be.

5.7. We therefore recommend a new policy to be inserted before Policy 19 on the lines of:

*Local authorities in all parts of the region should work together with emda and others with relevant responsibilities to encourage and foster the redevelopment of the regional economy by way of raising skill levels so that the region is better placed to enhance economic performance.*

5.8. Neither policy makes reference either to the employment needs of areas of substantial housing growth, nor to the policy of concentration in the principal urban areas. However, in our opinion, this is not necessary. In Chapter 3 we make recommendations about Policy 4 which, we hope, will make clear that it applies to all economic activity as well as simply “development”.

**Priorities within the region**

5.9. We share the view of emda and others as to the diverse nature of the region and its regeneration needs. Policy 19 lists the areas where special attention is needed for regeneration:

- the region’s principal urban areas and sub-regional centres that exhibit very high and concentrated levels of deprivation;
- the Northern Sub-area, with its concentration of economic, social and environmental problems linked to the decline of the coal industry;
- economically lagging rural areas identified by the Government’s Rural Strategy, including the districts of East Lindsey, West Lindsey, South Holland, Bolsover, High Peak and the more rural parts of Derbyshire Dales, Bassetlaw and Newark and Sherwood;
- the towns of Gainsborough, Mablethorpe and Skegness; and
- other settlements which display high levels of deprivation including Corby which is also designated as a Growth Town.

5.10. Much of this list speaks for itself and needs no comment. We would however, draw attention to the parts of the region’s cities and towns that exhibit very high and concentrated levels of deprivation.

5.11. While the employment rate in the East Midlands is above the UK average it disguises pockets of severe labour market deprivation that exist within the region. The region’s economy also has a high proportion of jobs that are low skilled, low paid and require few or no qualifications. Evidence shows that 12.2% of the economically active, working age population have no qualifications, compared to 10.8% in the UK.

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161 As defined by s.55 of the Town and Country Planning Act 1990.
5.12. Although the East Midlands has an above average supply of jobs which require few or no qualifications, an individual with no qualifications is still far more likely to be unemployed and far more likely to earn low wages if they are in employment. The employment rate for those with no qualifications in the East Midlands in 2003 was only 54.0% compared to 78.5% for those qualified up to an equivalent of 5 GCSEs at A* - C (Level 2). Additionally, the average weekly pay for workers with no qualifications in 2003 was only £229 compared with £268 for those with a Level 2 qualification and less than half that earned by workers with an equivalent of a degree (Level 4). Improving basic skill levels amongst adults is therefore important to help address significant social inequalities as well as contributing to the improvement of workforce productivity.

5.13. We share the commonly held view that tackling these problems requires concerted action across the whole spectrum of local governance – local authorities, emda, the Learning and Skills Council, the Employment and Skills Partnership, Job Centre Plus and Neighbourhood Renewal.

5.14. We acknowledge that much of this is outside the traditional scope of town and country planning. Nevertheless planning does have a supporting role, which is not confined to the “provision” of employment land. All this can be found, albeit briefly, in the supporting text to Policy 19. However, the message that concerted action is needed across the whole spectrum of local governance needs to be passed down to the local planning authorities.

5.15. Regeneration is not only a matter of attracting inward investment. Encouragement also should be given to endogenous investment, not least in small businesses which may all too easily be crowded out by larger scale activity.

5.16. While economic regeneration often goes hand in hand with additional new house building and urban expansion generally, our view is that this need not always be the case. Economic regeneration is undoubtedly needed in the Northern Sub-Area and in economically lagging rural areas. The availability of good quality housing may well be a key to regeneration in these areas. But regeneration of these areas must conform nevertheless to the fundamental strategy of concentration and so the emphasis here should be on the redevelopment of poor, outworn and neglected housing. Regeneration, particularly in the lagging rural areas also is heavily dependent upon accessibility and transport improvements.

5.17. We therefore recommend additions to Policy 19:

-making it clear that concerted action is needed across the whole spectrum of local governance and that local development

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162 This and the preceding paragraph is from additional written evidence from emda, submitted by request.
163 Seven areas in the region receive neighbourhood renewal funding — Ashfield, Bolsover, Derby, Leicester, Lincoln, Mansfield and Nottingham (emda additional written evidence).
164 Pre-examination statement of the Federation of Small Businesses and oral evidence on their behalf by Ms Cath Lee.
165 Oral evidence of Mr Anthony Payne on behalf of emda.
166 Federation of Small Businesses statement and oral evidence of Ms Lee.
documents should translate this message into the action required locally;

making it clear that regeneration of all the priority areas must conform with the strategy of concentration set out in Policy 4.

### Allocation of employment land

5.18. Policy 20 makes no quantification of employment land to be allocated in local development frameworks. While some local planners would find such quantification helpful, particularly in relating employment to housing, others did not. A particular problem arose from doubts as to the value of the guidance available. For the draft strategy, the Assembly had commissioned Roger Tym and Partners:

- to forecast future requirements for employment (B-Use Class) land to 2021 and 2026 by housing market area, based on employment forecasts commissioned by emda from consultants Experian;

- to compare this with the current planned supply of employment land, including losses, based on information from the regional spatial strategy’s annual monitoring report; and

- based on this analysis, to propose indicative employment land requirements by housing market area and local authority area, to be included in the emerging draft East Midlands Regional Plan.

5.19. The forecast figures produced by the study indicate a substantial rise in office jobs and floorspace need, substantial contraction in industrial jobs and industrial floorspace and a relatively small increase in warehousing jobs coupled with a substantial increase in warehousing space. A general conclusion is that there is a very substantial excess of employment land allocated. Almost without exception, a similar pattern applies to each housing market area.

5.20. However, there was little support for the study, even though it yielded not dissimilar results for Northamptonshire as were adopted in the Milton Keynes South Midlands Sub-Regional Strategy. Most of the critics doubted the robustness of the assumptions used, and some doubt was also expressed as to whether the approach was a good one anyway, given the present (generally agreed) over-allocation of employment land and the desirability of allocating quality sites which are related to the priorities of economic regeneration.

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167 The pre-examination statements of Nottingham City Council, Hinckley and Bosworth District Council and others in Leicestershire, and Broxtowe Borough Council, also, in oral evidence, Mr Richard Bryant on behalf of Chesterfield Borough Council, among others.

168 Notably those represented by the Lincolnshire Assembly.


171 *Ibid.*, Tables 2.2 and 2.4.

172 *Ibid.*, Table 2.3.

173 Not least the Government Office, emda, and the CPRE.

174 Written and oral evidence of Mr Anthony Payne on behalf of emda.
5.21. Given the unhappiness with the Roger Tym study, or indeed any region-wide study of this nature, we are of the view that local planning should be guided by a policy which requires local authorities, emda and sub-regional strategic partnerships to work together in housing market areas to undertake and keep up to date employment land reviews. Despite the risk of inconsistency across the region, we agree that these reviews at local level should be the fundamental building blocks in the local planning process\textsuperscript{175}. A timetable\textsuperscript{176} of current progress in preparing them shows that in most of the region such reviews are already in place, notably in the Three Cities Sub-area.

5.22. We agree that the allocation of land locally should adequately meet both local needs and local circumstances. We like a suggested alternative wording to Policy 20\textsuperscript{177} apart from it not mentioning collaborative working across each housing market area\textsuperscript{178}. Exceptionally, we spell out our recommended policy revision.

5.23. We therefore recommend [R5.3] the replacement of Policy 20 by the following:

\textbf{Policy 20}

\textit{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:

be responsive to market needs and the requirements of potential investors, including the needs of small businesses;

courage 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 rural economy;

assist the development of sites in the Priority Areas for Regeneration;

be of a scale consistent with the essential policy of concentration as set out in Policy 4.

\textsuperscript{175} Oral evidence of Mr Anthony Northcott on behalf of the Lincolnshire Assembly.

\textsuperscript{176} Tabled by Mr Pritchard, by leave, at the examination, Core document REG55.

\textsuperscript{177} Proposed by emda in their pre-examination statement.

\textsuperscript{178} An important reservation by Mr Pritchard in oral evidence.
Strategic Distribution Uses (Logistics)

5.24. The draft strategy has text about strategic distribution uses (logistics, to use a common neologism), but no explicit policy about them. The importance of this sector is growing with globalisation and is particularly important in the region. However, as we set out in Chapter 12, insufficient thought has been given to freight movement and distribution in the draft strategy. Logistics accounts for some 9% of both jobs and output (GVA) in the region, more than in any other region, due to the central position of the East Midlands in the transport network of the UK. Contrary to popular belief, labour productivity and earnings are above the economy-wide average for the service sector, although below those for manufacturing.

5.25. Despite misgivings that it would be premature to commit the region to a development policy in advance of a “Green Logistics” study looking beyond an unsustainable distribution pattern based on centralisation and large catchments, and to undue policy preference being given to a single sector, we recognise the importance of this sector to the national economy and to the national policy of shifting freight from road to rail. We therefore think that provision for strategic distribution is better planned than unplanned.

5.26. There is insufficient evidence to specify locations for strategic distribution centres, nor is it necessary. But we do think that an additional policy guiding the selection of sites in local planning and development control should be added to the draft strategy. A policy suggested during the examination provides a useful starting point for such a policy, which we think should be strengthened to protect the trunk road system. The policy both specifies the general areas of search and also sets out criteria for site selection. We trust that the criteria speak for themselves as to their necessity.

5.27. Again exceptionally, we spell out our recommended policy addition.

5.28. We therefore recommend the addition of a new Policy to follow Policy 20 of the draft strategy.

Policy 20A

Strategic Distribution

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

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179 See paragraph 142 of the non Technical Summary of the Sustainability Appraisal.
181 Oral evidence of Miss Bettina Lange of the CPRE.
182 Oral evidence of Mr Mark Chant of Northamptonshire County Council and of Mr Jim Froggatt of the East Midlands Transport Activists’ Roundtable.
183 Pre-examination statement of the Highways Agency.
184 PPS11, paragraph 1.17.
185 By emda.
distribution use in the region with preference to sites in the following broad locations:

- 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

In allocating sites in local development documents local authorities should give priority to sites which can be served by railfreight, and operate as inter-modal terminals.

Consideration should be given to the following criteria:

- at least 50 hectares of developable land;
- good rail access with a generous loading 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
- good access to labour.

5.29. In setting out a policy for strategic distribution we are mindful of the smaller freight operators whose business is often at the local level. There are some 2,700 small freight operators in the region and they are vital to the region’s economy\(^{186}\). In considering sites for employment under Policy 20, local planning authorities will, of course, take the needs of local freight operators into account.

**Town centres and retailing**

**Town Centre Functions**

5.30. Town and city centres have so much more to offer than retailing and leisure facilities that we agree\(^ {187}\) that Policy 21 should make reference to all appropriate town centre functions, as set out in PPS6, namely:

- retail (including warehouse clubs and factory outlet centres);
- leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through

\(^{186}\) Evidence of the Federation of Small Businesses in both pre-examination statement and oral evidence of Ms Lee.

\(^{187}\) With the Government Office and the Federation of Small Businesses.
restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices, both commercial and those of public bodies; arts, culture and tourism (theatres, museums, galleries and concert halls, hotels, and conference facilities); and housing, which will be an important element in most mixed-use, multi-storey developments.

5.31. Because town and city centres are usually the focus of public transport routes, we stress particularly their role of providing for office development. We stress also the role of town and city centres in providing for housing development. While not everyone appreciates lively, or to some, rowdy and unpleasant, night life\(^{188}\), some do and would like to live in the centre of busy cities.

5.32. We stress also the value of mixed uses in town and city centres\(^ {189}\).

The retail hierarchy and the role of market towns

5.33. We received useful evidence\(^ {190}\) ranking the retail centres of the region indicates discontinuities in national rank and “score” which would place Nottingham and Leicester at the top with Lincoln, Derby and Northampton in second place, followed after another discontinuity by the other 22 centres. Whether this constitutes a genuine hierarchy is a matter of dispute\(^ {191}\). The DTZ study of 2003\(^ {192}\) supports the assertion in the draft strategy that there is no clear retail hierarchy in the East Midlands\(^ {193}\). This is not to say, of course, that some centres are not bigger than others with a greater range of goods and services on offer. But we failed to find evidence that the bigger centres perform markedly different roles from the smaller and that the smaller centres are in some way subordinate to them. Only if this were the case would there be a true hierarchy\(^ {194}\). So we share the view\(^ {195}\) that the roles of the main centres in the region is well set out in the sub-area analysis in the extended paragraph 3.2.14.

5.34. In general we consider that the pattern of the retail network should relate to the fundamental strategy set out in Policy 4\(^ {196}\), and it does. If there is one concern, it is that the largest retailing centres in and adjoining the region are gaining trade at the expense of smaller centres, such as market towns and outer suburban centres such as Oadby. Not all market towns enjoy success, and many are experiencing decline,

\(^{188}\) Oral evidence of Miss Bettina Lange on behalf of CPRE.

\(^{189}\) Written and oral evidence of Ms Lee of the Federation of Small Businesses and of Mr Geoff Brown of emda. See also PPS6, paragraph 1.9.

\(^{190}\) Presented by Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres.

\(^{191}\) With Lichfield’s asserting that it does, of course.

\(^{192}\) DTZ Regional Town Centres Study for the East Midlands, Final Report March 2003, Core document RET1.

\(^{193}\) Paragraph 3.2.12.

\(^{194}\) As archbishops preside over bishops, bishops over archdeacons, archdeacons over rural deans and rural deans over parish priests, with lay readers at the very bottom of the heap. Now that is a true hierarchy.

\(^{195}\) Pre-examination statement of emda.

\(^{196}\) With our proposed modifications.
especially in their retail offering\textsuperscript{197}. This is, in our view, an undesirable trend as it tends to reduce access to good quality retailing and services, particularly in rural areas, and it increases the need to travel. From this point of view, the ideal (even if impractical of realisation) is that all everyday needs should be available to all within walking distance\textsuperscript{198}. In our view, this is not a matter that should or can be dealt with by restricting the growth of the more successful centres. Rather the answer lies in making the other centres more attractive\textsuperscript{199}.

5.35. We do not see much wrong with Policy 21. While it does not attempt to force a spurious hierarchy on a more diffuse urban system, it sets out clearly a strategic framework for the development of a network of centres. It also sets out an estimate (for what it’s worth) of the overall need for additional floorspace. It could however be clearer, and we commend a suggested wording to introduce paragraph 3.2.14.

5.36. We therefore \textbf{recommend} [R5.5]:

That Policy 21 should be modified by the inclusion of all appropriate town centre uses in its first bullet point, and that the introduction to the extended paragraph 3.2.14 be replaced by text to the effect that:

\textit{In the absence of a clear hierarchy, the distribution of additional retail floorspace to town centres in the region should be in line with Policy 4. The focus for major growth is to be on maintaining the roles of the existing principal urban areas which function as the main retail and service centres and are already well served by transport and other infrastructure. There are also opportunities for some sub regional centres and rural market towns to consolidate and develop their role in their sub-areas. Below this level, some local centres and rural towns will also need positive action to ensure they continue to serve the needs of local communities. The following sections identify the priority centres for additional retail development...}

\textbf{Rural diversification}

5.37. National policy for diversification is plainly set out in PPS7 and although we heard representations from all sides that aspects of this policy should be either hardened or softened, we see no regionally specific justification for either approach.

5.38. Although criticism was made of the reference to specific priority areas on the basis that resources should be channelled according to economic and social deprivation criteria\textsuperscript{200}, we note that the specification of the areas concerned appears to be well founded\textsuperscript{201}. And although there was concern that the according of priority to some areas would be to the

\textsuperscript{197} Pre-examination statement of the Leicestershire Chamber of Commerce.
\textsuperscript{198} Oral evidence of Miss Lange.
\textsuperscript{199} Oral evidence of Mr Thomas Purnell of Leicestershire County Council, Ms Lee, Miss Lange and Mr Pritchard.
\textsuperscript{200} Oral evidence of Miss Lange.
\textsuperscript{201} It is supported by the Rural Affairs Forum.
exclusion of others, we were assured\textsuperscript{202} that this was not the case. As we see it, the priority is just that, nothing more.

5.39. While PPS7 speaks specifically of diversification in the context of farm diversification\textsuperscript{203}, the draft strategy in fact is referring to the diversification of the whole of rural local economies\textsuperscript{204}. We agree\textsuperscript{205} that this should be made clearer in the supporting text.

5.40. Unlike other policies, Policy 23 is not explicitly directive upon local development frameworks. While it goes further than this, it would be useful, in our opinion, to make it clear that the policy is directive.

5.41. We therefore recommend [R5.6] that a note be attached to the end of Policy 23 making it clear that local development documents should develop the policy according to local circumstances, and also that an addition to the supporting text be made to the end that it should be clear that the policy refers to all aspects of the diversification of rural economies and not only to farm diversification.

**Recommendations**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
</tr>
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<tr>
<td>R5.1</td>
<td>5.7.</td>
<td>A new policy to be inserted before Policy 19 on the lines of: <em>Local authorities in all parts of the region should work together with emda and others with relevant responsibilities to encourage and foster the redevelopment of the regional economy by way of raising skill levels so that the region is better placed to enhance economic performance.</em></td>
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<tr>
<td>R5.2</td>
<td>5.17.</td>
<td>Additions to Policy 19: <em>making it clear that concerted action is needed across the whole spectrum of local governance and that local development documents should translate this message into the action required locally; making it clear that regeneration of all the priority areas must conform with the strategy of concentration set out in Policy 4.</em></td>
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| R5.3                  | 5.23.                   | The replacement of Policy 20 by the following:  

**Policy 20**  
*Regional Priorities for Employment Land*  
*Local authorities, emda and sub-regional* |

\textsuperscript{202} By Mr Pritchard and Mr Birkinshaw among others.  
\textsuperscript{203} At paragraph 30.  
\textsuperscript{204} Oral evidence of Mr Pritchard.  
\textsuperscript{205} With Mr Pritchard.
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<td>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: 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 rural economy; assist the development of sites in the Priority Areas for Regeneration; be of a scale consistent with the essential policy of concentration as set out in Policy 4.</td>
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<tr>
<td>R5.4</td>
<td>5.28.</td>
<td>The addition of a new Policy to follow Policy 20 of the draft strategy. <strong>Policy 20A</strong> Strategic Distribution 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: West Northamptonshire housing market area</td>
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In allocating sites in local development documents local authorities should give priority to sites which can be served by railfreight, and operate as inter-modal terminals.

Consideration should be given to the following criteria:

- at least 50 hectares of developable land;
- good rail access with a generous loading 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
- good access to labour.

R5.5 5.36. That Policy 21 should be modified by the inclusion of all appropriate town centre uses in its first bullet point, and that the introduction to the extended paragraph 3.2.14 be replaced by text to the effect that:

In the absence of a clear hierarchy, the distribution of additional retail floorspace to town centres in the region should be in line with Policy 4. The focus for major growth is to be on maintaining the role of
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<td>the existing principal urban areas which function as the main retail and service centres and are already well served by transport and other infrastructure. There are also opportunities for some sub-regional centres and rural market towns to consolidate and develop their roles in their sub-areas. Below this level, some local centres and rural towns will also need through positive action to ensure they continue to serve the needs of local communities. The following sections identify the priority centres for additional retail development...</td>
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<tr>
<td>R5.6</td>
<td>5.41.</td>
<td>That a note be attached to the end of Policy 23 making it clear that local development documents should develop the policy according to local circumstances, and also that an addition to the supporting text be made to the end that it should be clear that the policy refers to all aspects of the diversification of rural economies and not only to farm diversification.</td>
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Chapter 6: Tourism

Express policies or integrate with other policy areas; economic benefits overstressed.

Express policies or integrate with other policy areas

6.1. In common with a number of policy areas in the draft strategy, Policy 24 has not been fundamentally altered since its predecessor RSS8. There have been changes in introductory wordings but there has not been a review of the policy content. Since the preparation of the draft strategy, new national guidance has been given on what is required for regional spatial strategies in relation to tourism\(^{206}\). This guidance says that strategies should make clear:

"their vision and strategy for tourism in the region;
how this contributes to broader regional objectives;
what level of growth in tourism they are trying to achieve; and
what the spatial characteristics of this will be\(^{207}\)."

6.2. With £2 billion spent annually on overnight stays and £3 billion on day trips, we can have no doubts as to the value of tourism and the visitor economy to the economy of the region\(^{208}\) and we share the view\(^{209}\) that, as a review of tourism policy was not undertaken for the present draft and as national policy has moved on, a thorough review should be conducted as soon as is convenient.

6.3. There is no shortage of evidence as to what might be covered in a review – the relationship of leisure tourism to business visiting\(^{210}\), waterways, including canals\(^{211}\), different types of tourism and accommodation\(^{212}\), tourism and rural transport networks\(^{213}\) and the role of the Lincolnshire Coast\(^{214}\) to name but a few.

6.4. During this review the use of the term “tourism” may need to be further thought through. There was some discussion at the examination regarding the term “visitor economy”, and it was suggested that it might be a more all encompassing term than “tourism”\(^{215}\) which implies holiday based trips. However, we note that the recently deleted PPG21\(^{216}\) uses a definition of tourism from “The Tourism Society” which includes “travel


\(^{208}\) Oral evidence of Mr Roger Bég of East Midlands Tourism.

\(^{209}\) Expressed by the Government Office, East Midlands Tourism and others.

\(^{210}\) East Midlands Tourism in written and oral evidence of Mr Bég.

\(^{211}\) British Waterways and East Midlands Strategic River Corridors Group in written and oral evidence of Mr Peter Williams and Mr Richard Newton.

\(^{212}\) British Holiday Homes and Parks Association in written and oral evidence of Mr Martin Taylor.

\(^{213}\) Oral evidence of Mr Andrew Shirley of the Country Land and Business Association.

\(^{214}\) Oral evidence of Mr Bég.

\(^{215}\) Oral evidence of Mr Bég.

\(^{216}\) Core document PP21.
and visits for business, professional and domestic purposes as well as for holidays and recreation”. The use of the term should be clarified. Whilst this may be construed as repeating national guidance, it would benefit the clarity of the policies on tourism in the plan and as such **we recommend** [R6.1] clarification of the term tourism in the supporting text to 3.2.19.

6.5. We share the view also that tourism, however important to the regional economy, should not be seen only in economic terms. Leisure tourism is important for its own sake in providing for the leisure needs of the people of the region and visitors to it. Nor should the overlap between leisure tourism and business visits be ignored, nor yet the connection between tourism on the one hand and culture, sport and recreation on the other.

6.6. We are mindful, however, that Policy 24 does not stand on its own in the draft strategy, but is complemented by, and integrated with, many of the strategy’s policies, particularly in the sub-area policies. Taken as a whole, we would not regard the draft strategy as unsound in the light of the desiderata outlined above. Of course it could and should be thoroughly reviewed and possibly expanded, but this should wait for the next review. In the meantime, we think that a few additions could be made to the supporting text. So **we recommend** [R6.2] that no modification be made to Policy 24 itself, but that the supporting text at paragraph 3.2.20 be expanded to refer also to the Lincolnshire Coast towns, to the Dukeries, to Rockingham Forest, the Nene Valley Regional Park and the Northamptonshire historic towns and villages, and, in the Three Cities Sub-area, to the historic houses and parklands such as Kettleston, Melbourn and Cork.

**Economic benefits overstressed**

6.7. We agree that the supporting text to Policy 24 places undue emphasis on the economic benefits of tourism in comparison with the fundamental human value of leisure and recreation.

6.8. We agree that sustainable tourism should be encouraged and that there are some deficiencies in the sub-area policies which have been addressed in the relevant chapters of this report. We do not see, however, the advantage of reference in the draft strategy to the “Sandford Principle” in relation to the Peak District National Park, or to other rural areas where tourism is being promoted. The Sandford Principle is part of the statutory remit of planning in the National Park, and, in our view, is not appropriate in other rural areas, where natural heritage and other conservation policies, such as Policies 26-31, are applicable and a more balanced approach is called for. Moreover,

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217 Oral evidence of Ms Callie Lister on behalf of East Midlands Environment Link.
218 Policy 40.
219 Oral evidence of Miss Ann Plackett on behalf of English Heritage.
220 Section 62 of the Environment Act 1995 makes clear that if National Park purposes are in conflict then conservation must have priority. This is known as the ‘Sandford Principle’ and stems from the Sandford Committee’s recommendation, in 1974, that enjoyment of the National Parks ‘shall be in a manner and by such means as will leave their natural beauty unimpaired for the enjoyment of this and future generations’.
221 As advocated in the oral evidence of Mr Brian Montgomery on behalf of East Midlands Environment Link.
Policy 24 already requires the exploitation of tourist potential to minimise adverse impact on the environment and local amenity.

6.9. We therefore recommend [R6.3] another addition to the text supporting Policy 24 to the effect that the development of tourism is not only desirable from the economic benefits obtained, but is also important in improving the quality of life in the region. We also see advantage in locating Policy 24 and the related Policy 23 (Casinos) and their supporting material next to the policies for culture, leisure and sport (Policy 40) and we so recommend [R6.4].

**Recommendations**

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Chapter 7: Natural and Cultural Heritage

Green infrastructure and biodiversity; tranquillity and dark skies; the historic environment; guidance on woodlands; designations – local, European and International; regional specificity of policies.

7.1. This suite of policies delivers the region’s approach to natural and cultural heritage. We note the view that as currently ordered these policies lack clarity in providing a clear vision or direction for the region’s habitat and landscape\(^2\). Nevertheless, we are mindful that the draft strategy is to be read as a whole and feel therefore that there is little benefit in reordering the policies in this section. While we appreciate that the current linkages between the policies could benefit from better recognising the relationships between them\(^3\), we consider that the policies are put to no detriment by their current form and therefore we recommend [R7.1] no change in this regard.

Green Infrastructure and Biodiversity

7.2. The draft strategy shows a commitment to green infrastructure and biodiversity in Policies 27 and 28. It is paramount that green infrastructure plans are seen as part of the integrated approach to spatial planning which local development frameworks encompass, yet the fourth bullet point in Policy 27 does not distinguish at which policy level green infrastructure plans should be developed\(^4\). For the sake of clarity, we recommend [R7.2] the addition of “within Local Development Frameworks” to this bullet point.

7.3. The current steer of Policy 27 provides a good grounding for the implementation and delivery of green infrastructure. We note that the policy in the East of England RSS was referred to\(^5\) as a good example of how to deliver the green infrastructure network. There are merits in this, such as its express identification of responsibility to local development documents which we have already taken into account in the recommendation above.

7.4. Alongside green infrastructure is the concept of blue infrastructure which refers to the waterway network. We agree that drawing particular attention to blue infrastructure may undermine the overall multifunctionality of the concept of green infrastructure\(^6\). Rather than directly using the term blue infrastructure, the sentiment can be reinforced by reference to the waterways in the supporting text to Policy 27. We therefore recommend [R7.3] insertion of “waterways” after “river corridors” in paragraph 3.3.8.

7.5. It would be helpful to clarify paragraph 3.3.9 through the insertion of a map of the areas most likely to benefit from green infrastructure. Such maps are already available via the Assembly\(^7\) website and the

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\(^2\) Pre-examination statement of the Government Office.
\(^3\) Pre-examination statement of the Government Office.
\(^4\) Pre-examination statement of the Government Office.
\(^5\) Oral evidence of Mr Ian Patterson on behalf of Natural England.
\(^6\) Oral evidence of Mr Patterson.
\(^7\) Oral evidence of Mr Andrew Pritchard, on behalf of the Assembly.
relevant research is in Core document ENV13\textsuperscript{228}. \textbf{We recommend [R7.4]} that a map such as Map 31A from ENV13 (below) should be considered for incorporation into the draft strategy.

7.6. The supporting text to Policy 27 recognises the emerging role of regional parks beyond that of the already proposed Nene Valley Regional Park. In spite of concerns to the contrary\textsuperscript{229}, we consider that the regional parks have been appropriately recognised as a part of the region’s green infrastructure. It is apparent that the concept of regional parks is in the early stages of development in the East Midlands, but the allusion to them in the supporting text brings them recognition that will allow flexibility for their development locally. As the concept develops, we expect that there will be more detailed information about regional parks to be considered for future revisions of this draft strategy.

7.7. We accept that positive measures are required to facilitate the adaptation of biodiversity as it responds to climate change\textsuperscript{230} and that the habitats need to be in place to assist in this\textsuperscript{231}, but consider that Policy 28 is sufficiently robust in itself and requires no alteration. However, to strengthen the profile of climate change in the supporting text and its relationship to biodiversity, \textbf{we recommend [R7.5]} the insertion of “\textit{Climate change seems likely to increase pressure on such habitats}” as a penultimate sentence in paragraph 3.3.12.

\textsuperscript{229} Pre-examination statement of Charnwood Borough Council.
\textsuperscript{230} Oral evidence of Mr Warren Priest on behalf of the East Midlands Biodiversity Forum.
\textsuperscript{231} Oral evidence of Ms Karen Davenport on behalf of Natural England.
Tranquillity and dark skies

7.8. At present, reference to tranquillity occurs in the supporting text at paragraph 3.3.19, but is not currently included in policy. We agree\(^{232}\) that tranquillity should be referred to at the regional level and that it is part of landscape character in the wider sense.

7.9. Mention is made in the Rural White Paper to the development of an indicator of tranquillity, which is currently being worked on. Once this becomes available it could be a useful tool in guiding the approach to tranquillity, and as such it should be considered for potential inclusion in future revisions of this draft strategy.

7.10. Landscape character assessments are useful, with attention being drawn to them in Policy 30. It is therefore disappointing that tranquillity has not yet been considered in a landscape character assessment in the region\(^{233}\), and we would expect local policy to encourage this in the future.

7.11. Mapping work has shown that dark skies are rapidly disappearing from the region\(^{234}\) and we agree that value should be attached to them at the regional level. We concur that increased urban concentration, which is a fundamental objective of the draft strategy, is important in maintaining areas of dark skies\(^{235}\).

7.12. Taking account of these points, we recommend [R7.6] the inclusion of “including recognition of the value of tranquillity and dark skies” to the end of the third bullet point in Policy 30.

The historic environment

7.13. Policy 26 is a scene setting policy for the protection and enhancement of the region’s natural and cultural heritage, with Diagram 3 (Natural Assets)\(^{236}\) and Diagram 5 (Historic Assets) providing the visual representation of the assets it is seeking to protect. We consider that incorporating more detail into “Diagram 5: Historic Assets”, such as listed buildings and scheduled monuments\(^{237}\) would make the diagram overly cluttered with little benefit to the representation of the historic assets of the region. There would however be merit to merging the two diagrams for the sake of reflecting Policy 26 more accurately and holistically\(^{238}\), and we recommend [R7.7] accordingly.

Guidance on Woodlands

7.14. We note the Woodland Trust’s standard for access to woodland for local residents, which includes an aspiration that everyone should have a two hectare wood within 500 metres of their home, is not included in the draft strategy. However, in our view it would not be appropriate to include such an aspirational target as a regional policy; it is better dealt with taking account of local circumstances as part of the local development framework process.

\(^{232}\) Oral evidence of Ms Ann Plackett on behalf of English Heritage.
\(^{233}\) Oral evidence of Mr Patterson.
\(^{234}\) Mrs Janice Bradley on behalf of East Midlands Biodiversity Forum.
\(^{235}\) Oral evidence of Mrs Bradley and Mr Alan Hubbard, National Trust.
\(^{236}\) Please note the typo in the title of the diagram.
\(^{237}\) Original submission of English Heritage.
\(^{238}\) Pre-examination statement of the Government Office.
7.15. There was some discussion at the examination surrounding the clarity of Policy 29 and whether or not it demonstrates an inconsistent approach to ancient woodland that could be mis-interpreted by local planning authorities\(^{239}\). It was thought by some that the sentence “Woodland unavoidably lost to development should be replaced with new woodland of an equivalent value”, in the second paragraph of Policy 29, contradicted the express protection of ancient woodlands in paragraph 4. We have no doubt that it is apparent that ancient woodland is an irreplaceable asset, and that the policy is clear elsewhere that it should only be lost in exceptional circumstances. We therefore consider that Policy 29 adequately protects ancient woodland and we recommend [R7.8] no change to the draft strategy in this respect.

**Designations – Local, European, and International**

7.16. We heard some debate as to whether the final paragraph of Policy 30 relating to local landscape designations adds value to national guidance\(^ {240}\). We recognise that it may cause confusion as it is a paraphrase of what is more comprehensively put forward in PPS7\(^ {241}\). Therefore, we recommend [R7.9] that the final paragraph of Policy 30 be deleted.

7.17. Natura 2000 sites are referred to in the draft strategy at Policy 26, bullet point two. The sustainability appraisal\(^ {242}\) refers to the lack of definition of “damage” within the second bullet point and recommends an amendment to the policy. We consider that it is prudent to take the approach set out in the sustainability appraisal to clarify that damage of any kind is not permitted, in order to maintain the onward protection of these sites. So we recommend [R7.10] amendment of the second bullet point to “neither direct nor indirect damage to EU designated Natura 2000 sites will be permitted”.

7.18. The Assembly\(^ {243}\) confirmed that the legal position has been clarified by the Planning White Paper\(^ {244}\) and it would now be appropriate to include the world heritage site (Derwent Valley Mills) as an additional bullet point to Policy 26. We consider that it would be difficult to insert such a bullet point without compromising the fluidity of the policy. It would be more appropriate to provide an explanation as to what is meant by the first bullet point of Policy 26 “the Region’s internationally and nationally designated natural and historic assets” in the supporting text, and we recommend [R7.11] accordingly.

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\(^{239}\) Oral evidence of Mr Nick Sandford on behalf of the Woodland Trust.

\(^{240}\) PPS7: Sustainable Development in Rural Areas, 2004, paragraphs 24 and 25, Core document PP7.

\(^{241}\) Oral evidence of Mr Alex Bowness on behalf of the Government Office.


\(^{243}\) Oral evidence of Mr Pritchard.

Regional specificity of policies

7.19. PPS7 gives the overarching national policy relating to this topic. Overall, we feel that the policies are regionally specific and do not unnecessarily repeat national policies.

7.20. There was some discussion at the examination about Policy 26 not being wholly regionally specific, but necessary, as gaps in policy would be left if Policy 26 was removed. In the absence of a national spatial strategy, the gaps must be addressed here in order to meet such requirements as the Strategic Environmental Assessment and Appropriate Assessment\(^\text{245}\). Also, we do not feel that moving much of Policy 27 into Policy 26 would alleviate these concerns regarding the regional specificity of Policy 26\(^\text{246}\) and may compromise the clarity of the policies’ objectives. For these reasons we recommend [R7.12] that Policy 26 remains in the draft strategy.

Recommendations

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\(^{245}\) Pre-examination statement of the Regional Assembly.

\(^{246}\) Pre-examination statement of the Government Office.
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Chapter 8: Water Management

Policy 32 - a regional approach; promoting water efficiency; supply; funding of water infrastructure; development upstream; a way forward for the Lincolnshire Coast.

Policy 32 – A regional approach

8.1. In general we find that, as respects water resources and disposal, the draft strategy has been well researched, leaving few issues for serious discussion. It takes into account such matters as the EU Water Framework Directive, the need for River Basin Management Plans, the Habitats Directive and the Environment Agency’s Restoring Sustainable Abstraction programme. An independent study of water supply has been commissioned jointly by the Assembly, the Environment Agency and the relevant water companies.

8.2. Nevertheless, we invited discussion of issues related to the problem of providing water supply, including the linked problems of obtaining greater efficiency in supply and use, and of the disposal of waste water. We also considered the problems involved in securing long-term investment and the desirability of securing sustainable drainage in the proposed development areas “up-river”.

Promoting water efficiency

Leakage

8.3. Leakage not only has an economic impact, it has an environmental impact also. Moreover, the increase in housebuilding proposed in the draft strategy, not to mention the further increases which we see necessary, will inevitably put a strain on the supply of good quality water. So we have much sympathy with the view that statutory leakage targets should become more stringent as the years go by, and enforced rigorously. But, given the statutory regulation of the water industry in this policy area, we agree that setting targets in this field is not a matter for regional spatial strategy. Policy 32 requires all concerned to “assess the scope for reducing leakage” and this, we agree, is about as far as regional spatial strategy should go.

8.4. So we recommend [R8.1] that no targets should be added to the draft strategy in respect of reducing water supply leakage.

Efficiency in use

8.5. The draft strategy in Policy 32 sets a target of 25% for an improvement in water efficiency in new development, equivalent to a saving of some 35 litres per person of water daily. We note both that this is achievable and should be imposed on new building through the cascading of strategic policy into local development documents.

248 Oral evidence of Mr Andy Baxendale on behalf of the Environment Agency.
249 Oral evidence of Mrs Janice Bradley of the East Midlands Biodiversity Forum.
250 With Mrs Bradley and Mrs Fiona Forgham of the Government Office.
251 Pre-examination statement of the Environment Agency.
also that this target is a minimum. More savings, up to 47%, could be achieved if the range of water efficiency measures were extended to include rainwater harvesting and greywater recycling\textsuperscript{252}.

8.6. We are impressed with evidence\textsuperscript{253} that water efficiency in existing houses could save up to 18% and in industrial units up to 35% and we need no persuasion of the importance of this consideration. As regeneration of the existing urban fabric proceeds, we can reasonably expect new and refurbished property to be made to conform to improved standards. We may reasonably expect also that incentives will be provided for the owners to improve their properties.

8.7. \textbf{We recommend [R8.2]} therefore that the relevant part of Policy 32 be strengthened to read:

"promote improvements in water efficiency in new development and in regeneration to achieve a regional target of a minimum of 25%".

\textbf{Supply}

\textit{Sufficient water supply capacity?}

8.8. It is clear from all the evidence that substantial investment is necessary in providing an adequate supply, even if all the planned measures to reduce leakage and improve efficiency of use are successful. This investment could, for example, involve an expansion of the treatment works at Rutland Water, a new reservoir on the lower River Witham or the utilisation of remaining groundwater opportunities\textsuperscript{254}.

8.9. Whether, in the long term, water will need to be imported into the region, with all its attendant engineering, economic and environmental problems, is not a matter which we are able to determine.

\textit{Sufficient water purification capacity?}

8.10. The draft strategy recognises\textsuperscript{255} that in a number of areas there are particular problems in providing sufficient water purification capacity. Undoubtedly new infrastructure will be required, but we note that there are no "showstoppers" and the existing strategy should accommodate growth for the next 5-10 years\textsuperscript{256}. While the long term may cause concern, there is no suggestion of a catastrophic outcome, despite doubts about sludge disposal on agricultural land\textsuperscript{257}.

\textbf{Funding of water infrastructure}

8.11. We understand the concerns expressed by the representatives of the water industry about the funding of investment in the long term\textsuperscript{258}. Their planning processes are not in synchrony with those of regional strategies: the existing 25 year Water Resource Plan was submitted to the

\textsuperscript{252} Pre-examination statement of the Environment Agency.

\textsuperscript{253} Of Mrs Forgham.

\textsuperscript{254} Oral evidence of Mr Baxendale and others.

\textsuperscript{255} At paragraph 3.3.33.

\textsuperscript{256} Oral evidence of Mr Marcus O’Kane of Severn Trent Water.

\textsuperscript{257} Oral evidence of Mrs Bradley, controverted by Mr Baxendale, Mr Mick Galey of Anglian Water and Mr Nick Thomson of the Institution of Civil Engineers.

\textsuperscript{258} Oral evidence of Mr O’Kane.
Environment Agency in 2004 proposing long term strategic investment to meet the then projected growth and statutory requirements. Since then, things have moved on and a higher level of growth is now proposed. A new draft Water Resource Plan is now proposed for 2008. Moreover, funding settlements are based on a five-year cycle\(^{259}\), but assurance of the investment is needed over a much longer period\(^{260}\).

8.12. There are also local problems in planning for waste water disposal. Provision has to be made on a catchment basis, and often development in a single district can fall into more than one catchment. Where it is to go is not known until it is decided in the course of local planning or development control, by which time it may be too late to plan effectively\(^{261}\).

8.13. This draft strategy, once approved, can be used as the basis for investment strategies, advising the water undertakers, the Environment Agency and the Director General of Water Services alike. But we do not consider it appropriate for us to enter the field of the relationship between the water companies and the Director General, which no doubt has strong commercial nuances. Nevertheless, we draw the attention of all concerned (if indeed it is needed) to the necessity of making investment plans for water supply and disposal in the long term.

8.14. As to the problems of local planning and investment, we note only that dialogue with people like water undertakers is fundamental to what is currently known as “front loading”\(^{262}\), that is early discussion of potential site allocations so that the implications for service providers can be assessed at an early stage. We commend also the joint production of “water cycle studies”\(^{263}\) (the term speaks for itself) such as are being prepared in Northamptonshire\(^{264}\) at these early stages of local planning.

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\(^{259}\) Water industry prices are controlled under an ‘RPI ± K’ formula. The regulated average percentage increase in prices in a year is limited to the increase in general inflation (the Retail Price Index, RPI) plus or minus a ‘K’ factor. At the periodic review of charges, the Director General of Water Services sets this K factor for each company based on assumptions about the forecast costs of providing the required set of services. This forecast includes assumptions on the scope for improving individual company efficiency and makes provisions for the investment needs facing each company. At privatisation, price limits were set for ten years ahead, but it was decided that the limits could be reviewed after five years if either the companies or the director wished to do so. In practice, the Director General has conducted periodic reviews of price limits every five years. The companies’ licences also provide for interim determinations of the K factor price limits between periodic reviews.

Companies are permitted to levy ‘infrastructure charges’ when properties are connected to water and sewerage systems for the first time. These charges were introduced in 1990 and are capped separately. They were limited to £200 each for water and sewerage connections from 1995. Subsequently, they have risen in line with inflation. [From P.Bailey (2002) *Regulation of the UK Water Industry*, University of Bath; pp.37 and 38].

\(^{260}\) Oral evidence of Mr O’Kane.

\(^{261}\) Oral evidence of Mr O’Kane.

\(^{262}\) An odd piece of jargon, explained in paragraphs 4.2 and 4.3 of PPS12.

\(^{263}\) Recommended by the Environment Agency in their pre-examination statement and discussed at the examination by Mr Galey and Mr Baxendale.

\(^{264}\) We heard that a Water Cycle Strategy for Corby was being developed, as well as one for North Northamptonshire. The scope for a Water Cycle strategy for West Northamptonshire was also being developed.
8.15. Suffice it to say that our view is that, whatever the problems in the provision of water services may be, they must be seen as challenges rather than being allowed to stand in the way of the region providing the homes and jobs that this strategy requires. We recommend no further modifications [R8.3] to Policy 32.

Development upstream

8.16. As we were reminded, almost all the region is in the catchment of lowland rivers flowing into the North Sea – the Soar/Trent (draining most of the Three Cities sub-area) the Witham (draining the Lincoln area) and the Welland (draining the Milton Keynes South Midlands developments). All these rivers have their flooding problems which are likely to be worsened as global warming increases the probability of out of the ordinary rainfall events.

8.17. It is all the more important therefore that, in all new development and wherever practical, redevelopment, drainage should be sustainable, that is not increase and wherever possible, reduce excessive run-off into rivers. This consideration can be read into a clause in Policy 35:

“Development should not be permitted if ... it would ... create ... an unacceptable risk (of flooding) elsewhere.”

8.18. But it is not obvious what is meant, and so we consider that it should be supported by a suitable explanation in the supporting text. This we recommend [R8.4].

A way forward for the Lincolnshire Coast

8.19. In the technical seminar that we held on the subject of coastal flooding we noted that:

38% of land in East Lindsey District;
71% of land in South Holland District; and
96% of land in the Borough of Boston

is in the coastal floodplain and in flood zone 3 as set out in PPS25. Map 1 indicates the areas concerned, being all land in which the “sequential approach” to development is advised.
8.20. What does this mean in practice? One approach is to assume that present levels of protection will continue for the foreseeable future, notwithstanding anticipated sea level rise. On this basis the planning of the areas at risk can continue as it has done in the past. This is essentially the view of the three local authorities concerned. Another assumption is that present levels of protection cannot be guaranteed and so no major development should be permitted until at least the matter had been properly studied. This was the starting point of the Environment Agency.

8.21. While much has been done to build up defences since the widespread disaster of the 1953 inundation, or that of 1978 in Boston, we are not persuaded that the flooding problem is overstated. Defences always need maintenance and they will need improvement in the face of sea level rise. But whatever is done, the risk is there and needs to be managed. It has always to be remembered that protection against a 1 in 200-year event does not mean protection for the next 200 years.

8.22. Given this almost intractable problem, we were pleased to receive a joint statement by the Assembly, the Government Office and the Environment Agency which, recognising the problems involved, proposes a “Project to prepare a strategy” for the Lincolnshire Coast that will inform an early review of spatial policy in the coastal zone. Until the study is complete, the parties acknowledge the need for a precautionary approach

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268 Oral evidence of Mr Baxendale on behalf of the Environment Agency (2007).
269 Dated 12 July 2007, Core document EXAM44.
to development and that in the short term the coastal towns must be maintained as viable communities. However, in the short term strategic growth initiatives should be directed away from flood zone 3 unless there is an express need for a coastal location and the conditions of PPS25 can be met.

8.23. The statement continues with a welcome assurance from the Environment Agency that it will continue to maintain flood defences and provide a flood forecasting and warning service in accordance with its statutory duties. In the longer term regeneration objectives for the Lincolnshire Coast must reconcile regeneration and the need to reduce flood risk taking into account the predicted impacts of climate change.

8.24. The implications for this agreed approach, which we welcome, are followed up in Chapter 17 (paragraphs 17.14-17.28) of our report, which also contains our recommendations on the matter.

**Recommendations**

<table>
<thead>
<tr>
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<tr>
<td>R8.1</td>
<td>8.4.</td>
<td>That no targets should be added to the draft strategy in respect of reducing water supply leakage.</td>
</tr>
<tr>
<td>R8.2</td>
<td>8.7.</td>
<td>That the relevant part of Policy 32 be strengthened to read: &quot;promote improvements in water efficiency in new development and in regeneration to achieve a regional target of a minimum of 25%&quot;.</td>
</tr>
<tr>
<td>R8.3</td>
<td>8.15.</td>
<td>No further modifications to Policy 32.</td>
</tr>
<tr>
<td>R8.4</td>
<td>8.18.</td>
<td>That a clause in Policy 35: &quot;Development should not be permitted if ... it would ... create ... an unacceptable risk (of flooding) elsewhere:&quot; should be supported by a suitable explanation in the supporting text.</td>
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</tbody>
</table>
Chapter 9: Minerals

Aggregates; other minerals; coal; safeguarding.

Aggregates

9.1. Regional planning bodies are charged in their regional spatial strategy with apportioning the regional guidelines for land won aggregates to each minerals planning authority\(^{270}\), in this case the five county councils and the Peak District National Park Authority. In the draft strategy, this is done in a table (Figure 1) linked to Policy 36. The table distinguishes between sand and gravel and crushed rock and, following the regional apportionment\(^{271}\), sets out the requirement for the period 2001-2016.

9.2. The apportionment caused a number of issues to be raised at the examination: whether it simply represented old fashioned predict and provide, whether it had been treated to an adequate sustainability appraisal, in particular recognising environmental capacities and formal designations and also whether the end date should be rolled forward to accommodate the needs of minerals development plan documents. An interesting prospect was also painted\(^{272}\) of the use of former mineral workings as reservoirs for the relief of flooding, but we consider that this is a matter which is of local, rather than regional, application.

Predict and provide?

9.3. Although the whole system of aggregate apportionment was criticised\(^{273}\) as being excessively “top-down” and little more than “predict and provide” we note that Government guidance clearly provides both for monitoring\(^{274}\) and for some flexibility in sub-regional apportionment\(^{275}\). Yet the system has stood the test of time, and, as independent professionals, we cannot think of a better way of ensuring that the planning process does not frustrate “an adequate and steady supply of material”. In any case, the system is well defined in national policy.

Sustainability appraisal and the environment

9.4. As part of the whole draft strategy, Policy 36 and the accompanying apportionment in Figure 1 have been subjected to the general sustainability appraisal of the draft strategy. The conclusions of the appraisal are reported briefly as follows:

"The draft Regional Plan moves towards increased secondary and recycled sources of aggregates but potential for sterilisation of mineral reserves remains."\(^{276}\)

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\(^{270}\) DCLG Minerals Planning Statement (MPS1) Planning and Minerals. (November 2006) paragraph 3.2, Core document MP1d.


\(^{272}\) By Mr Chris Swain on behalf of the Environment Agency.

\(^{273}\) By Mr Andrew Tickle on behalf of the Council for the Protection of Rural England (CPRE).

\(^{274}\) MPS1, paragraph 3.3.

\(^{275}\) MPS1, paragraph 3.8.

\(^{276}\) Sustainability Appraisal, Non-Technical Report, paragraph 88.
9.5. We agree\textsuperscript{277} that further appraisal can only be undertaken realistically when sites or locations, or criteria based policies are developed in minerals development plan documents.

9.6. A similar consideration, in our opinion, relates, by way of example, to the environmental questions raised in respect of hard rock quarrying in Charnwood, aggregate extraction in the Nene Valley (a potential Natura 2000 site), sandstone production from Sherwood sandstone and production from Areas of Outstanding Natural Beauty and the Peak District National Park. The regional apportionment has been reduced by some 25% over the past decade, largely due to greater use of recycled material. This reduction has enabled working in areas such as the Peak District National Park to be reduced\textsuperscript{278}, a trend that can be read as implicit in national policy\textsuperscript{279}. This piece of evidence may not be true of all environmentally sensitive areas of course, so if in the course of the local planning process it is found that environmental considerations make it impossible for the relevant minerals planning authority to deliver its apportionment, then it would be open to it to re-open the apportionment\textsuperscript{280}.

\textbf{Rolling forward the end-date}

9.7. While the regional apportionment and its sub-regional distribution give figures for the period 2001-2016 only – a period of less than nine years remaining – minerals planning authorities are concerned\textsuperscript{281} to make detailed plans for a longer period and would like guidance from the Centre as to what would be required of them. Knowing that minerals planning is an activity with a long time-scale, we have much sympathy with the authorities. The problem is one concerning sand and gravel working, where land banks are small rather than concerning hard rock quarrying, where permitted reserves are greater than the forecasts to 2016\textsuperscript{282}. Decisions are needed on the opening up of new working for sand and gravel but these will usually commit the planning process for far more years than nine.

9.8. Nevertheless, there are no evidence based figures available for a longer period, nor are they likely to be available for the next 18 months\textsuperscript{283}. Indeed, there are doubts whether really long-term planning of mineral demand can be at all reliable\textsuperscript{284}. The best that anybody can do at the present time is to “roll forward” the 2001-2016 figures on a “straight line” basis. This can be done just as well by the minerals planning authorities as by anyone else, perhaps even better, as they have better knowledge of the environmental considerations than the makers of regional strategy. Moreover, if the roll forward were to be made in the draft strategy, it

\begin{flushright}
\textsuperscript{277} With Mr Andrew Pritchard on behalf of the Assembly. See MPS1, paragraph 3.9.
\textsuperscript{278} Oral evidence of Mr Pritchard and Mr Peter Abbott on behalf of the Peak District National Park Authority.
\textsuperscript{279} MPS1, paragraph 14.
\textsuperscript{280} As provided for in MPS1, Annex 1, paragraph 3.8.
\textsuperscript{281} Oral evidence of Mr Mark Chant on behalf of Northamptonshire County Council and Mr Wayne Allum on behalf of Nottinghamshire County Council.
\textsuperscript{282} Oral evidence of Mr Allum.
\textsuperscript{283} Oral evidence of Mr Lonek Wojtulewicz on behalf of the Regional Aggregates Working Party.
\textsuperscript{284} Oral evidence of Ms Ruth Chambers on behalf of the Council for National Parks.
\end{flushright}
would have to be subject to a fresh sustainability appraisal on behalf of the Government Office\textsuperscript{285} and with very little local evidence to guide it.

9.9. We therefore recommend [R9.1] no modification be made to Policy 36 in respect of aggregate production.

**Other minerals**

*Building stone and slate*

9.10. A growing trend toward the specification of locally won natural materials both puts heritage protection potentially at odds with the protection of the natural environment and makes it all the more necessary for local (county) planning to recognise the issues. However, we recognise that, while the issues may be thought of as regional, they are capable of resolution only at local level, and so we concur that not only are the issues adequately dealt with in national guidance but are also covered by the first two bullet points of Policy 36 covering sourcing and safeguarding respectively\textsuperscript{286}.

*Brick clay*

9.11. The working of brick clay is unlike that of other minerals in that it is usually won in conjunction with individual brickworks\textsuperscript{287}. While Government goes to great lengths to provide figures for other building materials, it is left to the market to meet the demand. Planning for brick making is therefore a matter for the minerals planning authorities in consultation with the brickmakers\textsuperscript{288}. As with building stone and slate, the working of brick clay is covered by national guidance and the first two bullet points of Policy 36.

*Concrete*

9.12. We were urged\textsuperscript{289} to make a reference to the needs of the cement industry in the draft strategy. Cement is made at three places in the region: at Hope in the Peak District National Park, at Tunstead near the Park, both using Carboniferous limestone, and at Ketton in Rutland using Jurassic limestone which is also sold as building stone\textsuperscript{290}. These three plants account for some 25% of UK cement making capacity\textsuperscript{291} making the region the leading one for UK production\textsuperscript{292}. Cement production is particularly capital intensive and a new plant needs to have a land bank of some 25 years to pay for it. Materials can be imported (as at Rugby) but that is rather uneconomic\textsuperscript{293}.

\textsuperscript{285} Oral evidence of Mr Mick Smith on behalf of the Government Office.
\textsuperscript{286} Oral evidence of Mr Simon Heaton on behalf of UK Coal Mining Ltd, Mr Tickle and Mr Pritchard.
\textsuperscript{287} Oral evidence of Mr Chant.
\textsuperscript{288} Oral evidence of Mr Wojtulewicz.
\textsuperscript{289} By the British Cement Association in their written statement and in the oral evidence of Mr John Hernon.
\textsuperscript{291} Figure derived from Table 2 of ODPM/BGS (2006), omitting Rugby and South Ferriby (included in evidence) which are not in the East Midlands Region.
\textsuperscript{292} Apologies to Wales, Scotland and Northern Ireland for including them in the league of English regions.
\textsuperscript{293} Oral evidence of Mr Hernon.
9.13. We note however, that national policy for cement production is contained in the still extant MPG10 of 1991. At the regional level, it is covered by the all-embracing Policy 36. So we do not think that a specific policy on this matter could add anything useful. Questions of land banks for existing plants and the development of new plant are best addressed to the minerals planning authorities whilst they are engaged in the early stages (“front–loading”) of preparing their contributions to local development frameworks. A little more in the supporting text to Policy 36 would however be helpful.

**Recommendation on other minerals**

9.14. National policy requires regional spatial strategies to identify at the regional level those minerals which are of national and regional significance and include policies for them. To this end, a brief (but explicit) reference to the regional situation regarding each of the following – building stone and slate, brick clay and limestone for cement production – should be included in the supporting text, in order to underpin the all-embracing Policy 36, and we so recommend [R9.2].

**Coal**

9.15. Although there is a brief, but in our opinion adequate, reference given in the supporting text to the decline of the coal industry in the region and the main issues related to opencast working, Policy 36 expressly rules out “non-energy minerals” and there is no mention of deep mining becoming again an economic proposition.

9.16. National guidance on the opencast and deep mining of coal is given. This is that it is not for the planning system to attempt to set limits or targets for any particular source or level or energy supply, nor to predetermine the appropriate levels of coal to be produced by underground or opencast mining. It is for the minerals planning authorities to determine the acceptability of individual projects. So we do not think a specific policy on the subject of coal mining is wanted, although a reference should be made in the supporting text to deep mining as well as opencast. Additionally, although Policy 36 refers to the identification of “sufficient” sources of minerals, we do not consider this to relate only to the cascading of national and regional apportionments but to all minerals of “regional or national significance”. So we consider the way forward is the excision of the words “non-energy minerals” from Policy 36. We so recommend, and that the word “energy” is thereby included [R9.3].

**Safeguarding**

9.17. Throughout the discussion on the subject of minerals, it was clear that the question of safeguarding areas with potential for mineral working was in the minds of several participants, not to mention concern in the sustainability appraisal. Policy 36 in its second bullet point requires the

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294 MPS1, paragraph 15.
295 Oral evidence of Mr Heaton, Mrs Janice Bradley on behalf of the East Midlands Wildlife Trusts and Mr Pritchard.
296 MPG3 Coal Mining and Colliery Spoil Disposal (revised March 1999), paragraph 4.
297 See our paragraph 9.4 above.
identification of areas for safeguarding in local development frameworks, as does national guidance\(^{298}\). While the principal duty of defining minerals safeguarding areas is one for the minerals planning authorities, locally prepared development plan documents also should show these safeguarding areas\(^{299}\). In our view, there is no policy deficit on this issue, but we do think it useful here to draw the attention of this issue to our readers engaged in local planning.

**Recommendations**

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\(^{298}\) MPS1, paragraphs 9 and 13.  
\(^{299}\) MPS1, paragraph 13.
Chapter 10: Waste Management

The submitted revision; projections, targets and apportionments; locational specificity; centralisation v. localisation; cross-boundary movements; behavioural change.

The submitted revision

10.1. Before we opened the examination we were presented with a revised version of the section of the draft strategy that had been prepared by the Regional Technical Advisory Body working with the Government Office and the Environment Agency. It had not been approved by the Assembly, nor had it been subject to sustainability appraisal.

10.2. The revised version was criticised for being too long and going beyond the requirements set out in national policy, in particular the requirement “to include a concise statement for waste management” (our emphasis). We agree. There is no need, as we see it, to repeat all the material of the regional waste strategy in the draft spatial strategy. Moreover, if it be the case that the proposed changes, if adopted, would need sustainability appraisal, then valuable time would be lost. In our view, this is not a subject on which time can be wasted; we come back to this theme later.

Insufficiently concise?

10.3. But we have looked through the revised version to see what material, if any, might usefully be taken into the draft strategy. In our opinion there is clearly no need to take in generic material from national policy that applies all over the country. Nor should regional strategy attempt to add generic material that has no particular basis in the strategic planning of the region. So, for example, we see no need to repeat the well known “waste hierarchy” diagram.

10.4. Nor do we see much point in including the additional material included in the suggested Policies 37.1, 37.2 and 37.3-4. They add nothing that is not already in national policy, nor does the suggested Figure 7, pretty though it is. Suggested Policy 37.5, without any particular regional reason, takes from the draft strategy’s Policy 37 a shorter but different set of locational criteria from the extensive list in national policy, coupling these different criteria with other existing material from the draft strategy’s Policy 37.

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300 Proposed re-draft of Waste Topic Section 3, Core document MW7.
301 Oral evidence of Mr Andrew Pritchard on behalf of the Assembly.
302 Oral evidence of Mr Nigel Lee on behalf of the East Midlands Friends of the Earth, supported by Mr Robin Hall of the Government Office.
303 By Mr Pritchard.
305 To be found, inter alia, as Annex C of PPS10.
306 Good common sense, but adds little or nothing to spatial strategy.
307 Duplicates PPS10, paragraph 34.
308 Duplicates PPS10, paragraph 17.
309 PPS10, paragraph 20 and Annex E.
10.5. The suggested text in the paragraph numbered 3.3.63, under the heading "Sub-area Guidance" does, on the other hand, attempt to make a policy of a part (only) of what is supporting text in the sub-area guidance of paragraph 3.3.62 of the draft strategy.

**Pattern of provision**

10.6. Here there is a job to be done in turning the analysis of paragraph 3.3.62 into policy, and so we **recommend** [R10.1] an addition to Policy 37, to be placed before the paragraph beginning “In rural areas...” on the lines of:

*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.*

*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.*

*In the Southern Sub-area, there should be a centralised pattern based around the expanding urban centres.*

*In the Three Cities Sub-area a centralised pattern of large facilities should be developed.*

10.7. In identifying a spatial pattern of facilities, this, in our opinion, is true spatial strategy. In other respects, Policy 37 is, in our opinion, too long. As we have noted above it need not attempt to include locational criteria which duplicate national guidance, nor duplicate what we are recommending above. We therefore **recommend** [R10.2] the further modification of Policy 37 by the omission of the text “taking into account the following criteria” and the four bullet points following, also the paragraph beginning “In rural areas...”.

**Aftercare**

10.8. We are surprised to find no reference in national policy to the importance of the aftercare of waste management sites at the end of their useful life. We can see that such a reference could have value in the region, particularly where former colliery sites have been used as the site of waste management facilities. This oversight could usefully be remedied by the inclusion of appropriate text and the addition of policy on aftercare at the end of Policy 37. Such a policy is to be found in Policy 37.6 of the suggested revision. We so **recommend** [R10.3].

**Tables of apportionment**

10.9. Although national policy does not require a spatial strategy to do any more than look forward to a “fifteen to twenty year period” we found useful the tables giving annual indicative waste treatment/disposal capacity requirements by sub-area (not sub-region as stated) by five year

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311 For example at paragraph 32 of PPS10 "Planning Conditions".
312 PPS10, paragraph 6.
stages to 2024/2025. Their particular utility is that, taken together with Figure 5 of the draft strategy, they emphasise the urgent need for more facilities in the short term. They also include a breakdown on recycling. The figures should replace Table 3 in the draft strategy. Running to four pages of landscape format table, however, we think that they would be better placed in an appendix so as not to hold up the general narrative. As an appendix, the figures need connecting to policy, which we recommend [R10.4] in substitution for Table 3 and the paragraph in Policy 37 beginning “Waste local development frameworks should...” on the following lines:

\begin{quote}
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 (X), subject to further research and analysis as part of the annual monitoring process.
\end{quote}

**Projections, targets and apportionments**

**The quantities**

10.10. Apportionments of different sorts of waste to be managed by the waste disposal authorities throughout the region are there to provide a benchmark for local planning and a basis for annual monitoring. Nobody had any illusions about their likely accuracy, particularly in respect of the majority unregulated sector of commercial and industrial waste. The figures should inform the strategy, not drive it. So we commend the final clause of the recommendation above “subject to further research and analysis as part of the annual monitoring process” and hope it will be taken seriously.

**Targets**

10.11. We have some sympathy with the view that the target for recycling is too low and that we have a long way to go before we catch up with Germany. It could well be that bold targets are a spur to innovation. And while the draft strategy is based on a minimum of 50% recycling and composting of municipal solid waste by 2020, it should, on this view, be brought forward to an earlier date, as required by the Waste Strategy for England.

10.12. Nevertheless, the draft strategy assumes the achievement of the national and regional targets which were in force at the time of its

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313 As requested by the East Midlands Friends of the Earth.
314 Wording based on written evidence of 12 July 2007 by Mr Robin Hall of the Government Office.
316 Oral evidence of Ms Simone Aplin on behalf of the Environment Agency and Mr Lonek Wojtulewicz on behalf of the Regional Technical Advisory Body.
317 Oral evidence of Mr Mark Chant on behalf of Northamptonshire County Council.
318 Oral evidence of Mr Lee. Every house in Germany has a selection of brightly coloured wheeliebins for each sort of domestic waste.
319 Oral evidence of Mrs Janice Bradley on behalf of the East Midlands Wildlife Trusts.
320 Policy 37.
321 Oral evidence of Mr Lee.
preparation and the success of proposed waste management initiatives. In particular zero growth has been assumed from 2016\textsuperscript{323}. Discussion of long-term targets, in our view, matters little in the present situation, when the pressing urgency is a substantial acceleration of behavioural change and increase in the provision of facilities. There is a massive capacity gap as progressive increases in landfill tax drive demand up the hierarchy\textsuperscript{324}.

10.13. Although the draft strategy has targets for renewable energy\textsuperscript{325}, we agree that there should not be targets for waste-to-energy production as this is not a primary objective\textsuperscript{326}. This point is illustrated in the projection of renewable energy from landfill gas, which is expected virtually to disappear by the end of the plan period.

**Projection period**

10.14. To do its part in urgently providing facilities, the industry needs a greater degree of certainty than is provided by the draft strategy as to the amount to be provided for in the long term. A working life of seven years or more is needed for a small facility and 25 years or more for a large plant\textsuperscript{327}. In this context we note that the indicative figures which we are recommending should be included in the draft strategy as an appendix go up to 2024/2025.

10.15. While there is legitimate concern that the provision of long term projections could result in over provision of residual disposal facilities at the expense of greater separation at source\textsuperscript{328}, we consider this to be a lesser danger than the more immediate lack of provision, and in any case this is a point which we hope will be looked after in monitoring.

**Demand arising from new housing**

10.16. While the model used to project waste arisings is trend based rather than one that specifically takes account of the housing proposals of the draft strategy (except in Northamptonshire)\textsuperscript{329}, we do not consider that this point invalidates the projections. In the East of England, additional housing was reckoned to add some 1% to the municipal waste arisings, but, as we see it, such a percentage is well within the margin of error generally in this region. The critical priority, in our opinion, is not the derivation of beautiful sets of figures but the direction of travel toward the doubling of capacity by 2020, beginning now, and with some urgency.

**Locational specificity**

10.17. To do its part in urgently providing facilities, the industry also needs a greater degree of certainty than is provided by the draft strategy as to location\textsuperscript{330}. This point is plain enough, but certainty as to siting is a matter for the local waste planning process. If this process is prolonged,

\textsuperscript{323} Paragraph 3.3.63 of the draft strategy, confirmed in the submitted revision.
\textsuperscript{324} Oral evidence of Mr Robert Asquith on behalf of the Waste Recycling Group.
\textsuperscript{325} At Appendix 5.
\textsuperscript{326} A point on which the oral evidence of Mr Asquith, Mr Lee and Mr Pritchard was in agreement.
\textsuperscript{327} Oral evidence of Mr Asquith.
\textsuperscript{328} Oral evidence of Mr Lee.
\textsuperscript{329} Oral evidence of Mr Wojtulewicz and Ms Aplin.
\textsuperscript{330} Oral evidence of Mr Asquith.
there will be planning by appeal of course, which is not likely to achieve the best results. We were heartened to hear of progress by the region’s waste planning authorities in this regard who are looking for sites and dealing with planning applications even before the approval of their core strategies. Whether this will produce facilities quickly enough will be a matter for careful monitoring. Meanwhile, we trust that the draft strategy, with the modifications we are recommending, will provide all the locational guidance appropriate to a regional spatial strategy. We therefore recommend [R10.5] no change to the draft strategy on the subject of locational specificity.

Centralisation v. localisation

10.18. While the draft strategy proposes the centralisation of large facilities in the Three Cities Sub-area and in other places where there is a concentration of population, we agree that this need not be to the exclusion of small scale facilities in housing developments. Nevertheless, we agree also that while such activities as community composting are appropriate to a rural area, local small scale facilities are unlikely to solve all problems in the big towns and cities.

10.19. Brief general guidance on this matter is to be found in national policy, and we do not think it appropriate to extend it in this draft strategy. We therefore recommend [R10.6] no changes to take account of the subject of centralisation v. localisation.

Cross-Boundary Movements

10.20. While there appear to be small imports of waste into Northamptonshire and Derbyshire, the historic pattern has been a large export of waste to landfill in the East of England. This movement will be steadily wound down, not least because the East of England is running out of landfill sites. The East Midlands region also imports twice as much hazardous waste as it produces. Projections and apportionments used in the draft strategy have been made on the basis of trend and of the region dealing with its own waste. This is not to say of course that short distance cross-boundary movements are always wrong.

10.21. We see no special problem in cross-boundary movements that would require intervention in the draft strategy, and therefore we recommend [R10.7] no change to the draft strategy.

Behavioural change

10.22. While national policy and the regional waste strategy contain proposals for behavioural change, there is not much in the draft strategy.

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331 Oral evidence of Mr John Wright on behalf of Leicestershire County Council and Mr Pritchard.
332 Oral evidence of Mr Asquith.
333 With Mr Pritchard, among others.
334 Oral evidence of Ms Deborah Sacks on behalf of the East of England Assembly.
335 Oral evidence of Mr Wojtulewicz.
336 Oral evidence of Mr Pritchard.
337 Oral evidence of Ms Sacks.
338 Oral evidence of Ms Aplin.
339 Oral evidence of Mr Wojtulewicz.
that can directly affect it. Nor is there much flexibility in the draft spatial strategy. Behavioural change is therefore imperative, but fortunately there is evidence\(^\text{341}\) that it is happening. Monitoring will be particularly important on this subject. Meanwhile, we recommend [10.8] no change to the draft strategy in respect of behavioural change.

**Recommendations**

<table>
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<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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</table>
| R10.1                 | 10.6                    | An addition to Policy 37, to be placed before the paragraph beginning “In rural areas…” on the lines of:  
  *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.*  
  *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.*  
  *In the Southern Sub-area, there should be a centralised pattern based around the expanding urban centres.*  
  *In the Three Cities Sub-area a centralised pattern of large facilities should be developed.* |
| R10.2                 | 10.7                    | The further modification of Policy 37 by the omission of the text “taking into account the following criteria” and the four bullet points following, also the paragraph beginning “In rural areas...” |
| R10.3                 | 10.8                    | The addition of policy on aftercare at the end of Policy 37. |
| R10.4                 | 10.9                    | An appendix to connect the figures to policy, in substitution for Table 3 and the paragraph in Policy 37, beginning “Waste local development frameworks should...”, should read on the following lines:  
  *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...* |

### Recommendation Number | Report Paragraph Number | Recommendation
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 |  | Appendix (X), subject to further research and analysis as part of the annual monitoring process. | 
R10.5 | 10.17. | No change to the draft strategy on the subject of locational specificity. |
R10.6 | 10.19. | No changes to take account of the subject of centralisation v. localisation |
R10.7 | 10.21. | No change to the draft strategy in respect of cross-boundary movements. |
R10.8 | 10.22. | No change to the draft strategy in respect of behavioural change. |
Chapter 10 – Waste Management
Chapter 11: Energy

Background; consistency with national guidance; regional targets; the need for a criteria based policy; link to climate change; a “Merton style” approach? “future proofing”.

Background

11.1. Guidance on “Energy” in the draft strategy is contained within paragraphs 3.3.63 – 3.3.77, and covers the topics of regional priorities for energy; energy reduction and efficiency; and low carbon energy generation. Renewable energy targets are set out within a table in Appendix 5, while paragraph 3.3.76 sets out sub-area based guidance on technologies that may be appropriate in those areas. We note that much of the guidance in this section remains unchanged from that in the approved RSS8 (March 2005).

11.2. Although Policy 39 and the supporting text is concerned with combined heat and power and renewable energy technologies, we consider that the policy and text is satisfactory in respect of combined heat and power and so we focus in this section of the report on renewable energy technologies.

Consistency with national guidance

11.3. In considering the appropriateness of the draft strategy’s policies and supporting text on the issue of renewable energy we asked ourselves what can actually be achieved by regional level guidance? We note that the Companion Guide342 sees the regional level as the place where policy starts to become tangible for people. This is reflected in the sub-area guidance of the draft strategy, but we consider this adds little to policy beyond simply repeating national guidance. A lot of the targets to be achieved are national (and even international). These are the key targets that need to be met.

11.4. Although the Assembly considers that the framework is in place to allow decisions to be made at a local level which will contribute towards the targets, monitoring will be vital to ensure their delivery. This issue needs to be developed further in the draft strategy, with recognition of the important role the annual monitoring report can play. Additional supporting text should be added in this regard to explain the role of the Assembly, and we recommend [R11.1] accordingly.

11.5. One key issue that requires addressing is the robustness of the evidence at the regional level. We comment on this below, but overall we consider that further work needs to be carried out to ensure that the targets can be achieved. This will include landscape character assessments, and work to establish the suitability and environmental capacity of the sub-areas to accommodate the different technologies. This work needs to be done as soon as possible.

Regional targets

Appendix 5

11.6. Policy 39 sets out a regional target for Combined Heat and Power and district heating infrastructure. The regional renewable energy targets are then set out in Appendix 5. This table provides indicative targets by technology, and sets targets for the years 2010, 2020 and 2025. It is noted that there are several typographical errors within the table that should be amended. Despite the lack of debate about individual figures in the table, having looked at the background evidence we have concerns over the targets set and their delivery.

11.7. The overall target of 6.4% by 2010 appears to be a reduction from the 10.6% in the approved RSS, although we note that the previous target included a contribution from offshore wind. Although the draft strategy figure is not consistent with the 10% target in the Energy White Paper (2003), we heard that offshore wind was included in that target. PPS22 guidance now suggests that offshore wind should not be included in the regional target and we therefore consider the target of 6.4% to be appropriate and recommend [R11.2] no change to the figure.

11.8. Nevertheless, regional targets for offshore wind should be included in the draft strategy, and we recommend [R11.3] that the Assembly’s suggestion of 1,315GWh/year for 2010; 3,000GWh/y for 2020; and 3,483GWh/y by 2026 be included separately in the supporting text to Policy 39 and noted within Appendix 5.

11.9. It is clear from the evidence that the targets in the table are extremely challenging (some could be considered unachievable), and this needs to be made clear in the draft strategy. The scenarios in the report set a stark picture as to how achievable the national targets are within the region. There needs to be clearer policy wording stating the importance of reaching the national targets and how difficult it will be to achieve this in the region without a complete shift in current planning practice.

11.10. We understand that the targets need to be challenging to push renewable energy development forward, but there is also a need for realism about what is achievable and is likely to come forward. There is no point having a target that is just “pie in the sky”.

11.11. We have major concerns over the deliverability of the regional renewable targets. The evidence base used for setting the targets seems to us to be weak, relying on scenarios and assumptions that are unlikely to come forward in the timescales stated unless there is a major change in current planning practice within this field. Nevertheless we can see benefit in including the total renewable energy targets into Policy 39 to

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343 The text in the headings of the columns require altering for consistency (GWh/y, MWe), and it is assumed that the targets in the last two columns should be to 2026 rather than 2025 to align with the draft strategy plan period.
344 Core document ENE3.
345 Oral evidence of Mr Andrew Pritchard of the Regional Assembly.
346 In line with paragraph 4 of PPS22, Core document PP22a.
347 Paragraph 2 of their pre-examination statement.
highlight the pressing need for renewable energy developments. **We recommend** [R11.4] that the national targets\(^{349}\) be included in Policy 39 (adjusted to exclude the offshore wind element) as an interim measure until further work on the evidence base is carried out, to develop realistic and deliverable regional targets.

11.12. We heard\(^{350}\) that the “indicative” targets for 2025 in Appendix 5 only look to 2020 with any degree of certainty. National guidance\(^{351}\) states that fixed targets for specific technologies should not be set. Given this advice, and our concerns over the deliverability of the individual targets for the technologies, **we recommend** [R11.5] that it is clear in both the appendix and within the supporting text to the policy that all the targets are indicative.

11.13. The targets in the draft strategy rely heavily on micro-generation technology\(^{352}\), but we have concerns over whether this is achievable in the timescales given. Evidence\(^{353}\) would seem to recommend a combined micro generation target of 146 GWh/yr in 2020 rising to 2,850 GWh/y in 2050; whereas in Appendix 5 the 2,500 GWh/y target is moved forward to 2020. To achieve this target there will need to be a rapid take-up of micro generation. The target in Appendix 5 roughly relates to every new house in the region having some form of electrical micro-generation as well as other renewables. The Assembly admitted that this was a challenging target, and we would not disagree with this. This is very ambitious, even given the Government’s push towards achieving zero carbon new homes by 2016\(^{354}\). We note the further concerns\(^{355}\) that the micro-generation from wind may be a bit uncertain, and the technology might not be as robust as was first hoped.

11.14. We consider that the rest of the Appendix 5 table should remain in the draft strategy but **recommend** [R11.6] that supporting text be added to state how much of a sea-change will be needed if the targets are to be reached.

**Sub-regional targets**

11.15. The approved RSS8 contained county area targets for electricity generation from renewables, and some participants\(^{356}\) wished to see this breakdown of the regional figures in the draft strategy. A sub-regional breakdown of the figures was seen as being beneficial in terms of allocating responsibility to a more local level, to ensure delivery of the regional target, and that this would help in delivery and monitoring.

11.16. The Assembly’s view is that as the structure plan process no longer exists there is nothing for these county figures to relate back to. They do not see the value of having the county targets any more, and

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\(^{349}\) As detailed in paragraph 3.3.63 of the draft strategy.

\(^{350}\) Oral evidence of Mr Prichard.

\(^{351}\) PPS22 paragraph 5.

\(^{352}\) Pre-examination statement and oral evidence of Mr Pritchard.


\(^{355}\) Raised by the Ms Helen Chadwick on behalf of the Regional Assembly.

\(^{356}\) Nottinghamshire County Council statement, and oral evidence of Ms Vicky Portwain on behalf of npower and Mr Andrew Tickle on behalf of CPRE.
when unpicked by the evidence base\textsuperscript{357}, they were difficult to justify. We agree that a flexible approach needs to be taken, but are also aware of the advice in PPS22 and its Companion Guide, which allow for the possibility of sub-regional targets.

11.17. The advice in the supporting text to Policy 39 regarding the sub-areas is useful as far as it goes. We can see the advantages of setting sub-regional targets in terms of engaging the local level stakeholders, but do not see how this can be achieved at present given the lack of any substantial evidence base to justify sub-regional targets.

11.18. There is a need for further work to be carried out in terms of sub-regional assessments to ascertain the capacity of the sub-regions to accommodate the different technologies and how each area can contribute to achieving the regional target. This work will need to be carried out at an early stage, in line with the guidance within PPS22, its Companion Guide, and the consultative draft supplement to PPS1\textsuperscript{358}. This work should then assist the production of broad sub-regional targets. We therefore suggest no change to the draft strategy at this stage, but \textbf{recommend} \footnote{R11.7} an early review of the draft strategy in this regard.

\textbf{Other Issues}

11.19. Coal mine methane is mentioned as a significant opportunity within the Northern Sub-area, and Policy 39 states that sites should be safeguarded for access to this resource. With regard to its inclusion\textsuperscript{359} in the Appendix 5 table, there remains uncertainty\textsuperscript{360} about the technology associated with this resource. Therefore we consider that it should not be identified as a resource in Appendix 5.

11.20. Landfill gas is not a natural renewable resource, but it is included in Appendix 5 as it is continually being created. We heard\textsuperscript{361} that landfill is eligible for renewable obligations certificates whereas coal mine methane is not. This issue needs to be made clear in the table, and \textbf{we recommend} \footnote{R11.8} a footnote is inserted to explain the inclusion of landfill in the table, as well as paragraph 3.3.73 being expanded to state the position in terms of coal mine methane.

\textbf{The need for a criteria based policy}

11.21. Some participants held the view that the guidance for the sub-areas within paragraph 3.3.76 of the draft strategy gave a good steer towards the opportunities that are available in the sub-areas and the type of technologies that may be appropriate. It was argued that this guidance gave a more positive approach than criteria based policies. The guidance is useful in providing “leads” that local authorities will then need to follow up in local development documents. But as we have mentioned above, we suggest that the draft strategy should go much further in terms of providing sub-regional assessments to ensure that the overall targets are met.

\textsuperscript{357} Core document ENE8.

\textsuperscript{358} Core documents PP22a, PP22b and PP1b.

\textsuperscript{359} As suggested by Mr Keynes on behalf of Nottinghamshire County Council.

\textsuperscript{360} Oral evidence from Mr Pritchard.

\textsuperscript{361} Oral evidence from Ms Chadwick.
11.22. In terms of the criteria for onshore wind energy and criteria for new facilities for other forms of renewable energy within Policy 39 we consider that the approach taken by the Assembly is satisfactory. These considerations, together with the sub-area guidance provide suitable guidance for policies and proposals to be developed at a local level that can contribute towards achieving the regional objectives. We therefore recommend [R11.9] no change to the policy wording at the present time.

**Link to climate change**

11.23. We comment on climate change issues in Chapter 2, but there is a clear need to link the issue of energy to the climate change agenda and the CO₂ reduction strategy\(^{362}\). We heard\(^{363}\) that the link between the CO₂ reduction and the renewable energy targets was confusing and weak. The main objective from our viewpoint is to reduce CO₂ emissions as part of the whole climate change agenda. We consider that the background detail to the energy policies in the draft strategy is adequately set out in the supporting text to the policies and we therefore recommend [R11.10] no change to the draft strategy in this regard.

**A "Merton style" approach?**

11.24. Several participants considered that it might be appropriate to take a "Merton style" policy\(^{364}\) approach in the draft strategy. The Government Office\(^{365}\) considers that Policy 39 should be more robust and include a requirement of at least 10% of all new development energy need from renewable sources for housing schemes over 10 dwellings and commercial schemes of over 1000m\(^2\).

11.25. Guidance in PPS22\(^{366}\) provides the opportunity for this type of policy to be included and encouraged at the local level. We do not consider there is adequate justification for the inclusion of a requirement of this type at a regional level; as we do not see what it could add to advice already available at national level. We are aware though that there will need to be a substantial increase in on-site small scale renewable energy projects in the region in the future if the overall regional targets for renewable energy are to be achieved. We therefore recommend [R11.11] that the supporting text highlights the pressing need for local development documents to strongly encourage micro-generation schemes, taking into account the advice in PPS22 and the draft supplement to PPS1\(^{367}\).

**“Future proofing”**

11.26. The Assembly considers that they have “future proofed” the guidance and policies by focussing on the carbon neutrality concept and ways this can be delivered. They point to this as the real issue that needs to be driven through the draft strategy, and suggest that this aim will not

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362 Pre-examination statement of the East Midlands Friends of the Earth.
363 Oral evidence of Ms Mary Edwards on behalf of the East Midlands Friends of the Earth.
365 Pre-examination statement of the Government Office.
366 Paragraphs 8 and 18.
change in the future. How it is delivered might change, and they believe that the draft strategy provides sufficient flexibility to enable changes to be incorporated.

11.27. Carbon neutrality should be the main target, in line with the energy hierarchy, and this is the approach that should be taken\textsuperscript{368}. The Assembly consider that this approach is outlined sufficiently in Policy 38. We agree that the wider issue is of carbon neutrality, and the focus should go beyond issues such as the “Merton” approach which will only provide part of the solution to the need to reduce carbon emissions. Policy 38 acts as a useful tool in reinforcing the need for local authorities and other stakeholders to consider the energy hierarchy. We therefore recommend [R11.12] no change to Policy 38 but the supporting text should include a definition of carbon neutral development and operational carbon neutrality.

**Recommendations**

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<tr>
<th>Recommendation Number</th>
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<tbody>
<tr>
<td>R11.1</td>
<td>11.4</td>
<td>Supporting text is added to explain the monitoring role of the Assembly to ensure delivery of the regional targets.</td>
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<tr>
<td>R11.2</td>
<td>11.7</td>
<td>No change to the overall indicative regional target of 6.4% for renewable energy.</td>
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<tr>
<td>R11.3</td>
<td>11.8</td>
<td>That the Assembly’s suggestion\textsuperscript{369} of 1,315GWh/year for 2010; 3,000GWh/y for 2020; and 3,483GWh/y by 2026 be included separately in the supporting text to Policy 39 and noted within Appendix 5.</td>
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<tr>
<td>R11.4</td>
<td>11.11</td>
<td>That the national targets be included in Policy 39 (adjusted to exclude the offshore wind element).</td>
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<tr>
<td>R11.5</td>
<td>11.12</td>
<td>That it is made clear within the supporting text that the targets in Appendix 5 are indicative and that major changes will be required within the region if they are to be reached.</td>
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<tr>
<td>R11.6</td>
<td>11.14</td>
<td>That supporting text be added to state how much of a sea-change will be needed if the targets are to be reached.</td>
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<tr>
<td>R11.7</td>
<td>11.18</td>
<td>An early review of the Energy section of the draft strategy is carried out to include sub-regional assessments to ascertain how each sub-region can contribute to a regional target.</td>
</tr>
<tr>
<td>R11.8</td>
<td>11.20</td>
<td>A footnote is added to Appendix 5 to explain the inclusion of landfill gas, and paragraph 3.3.73 is expanded to state the position in...</td>
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\textsuperscript{368} Oral evidence of the Regional Assembly.

\textsuperscript{369} Paragraph 2 of their pre-examination statement.
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<td>terms of coal mine methane.</td>
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<tr>
<td>R11.9</td>
<td>11.22</td>
<td>No change to Policy 39 with regard to the criteria for onshore wind energy and new facilities required for other forms of renewable energy.</td>
</tr>
<tr>
<td>R11.10</td>
<td>11.23</td>
<td>No change to the draft strategy as the background detail to the energy policies is adequately set out in the supporting text to the policies.</td>
</tr>
<tr>
<td>R11.11</td>
<td>11.25</td>
<td>The supporting text should highlight the need for local development documents to strongly encourage micro-generation schemes.</td>
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Chapter 12: Regional Transport Strategy

Issues; conclusions.

Issues

12.1. Having regard to national policy guidance\textsuperscript{370} and an assessment of Matter 8 participant statements and written representations, in our view, these are the issues:

- Does the regional transport strategy adequately indicate existing major transport arteries in the region?
- Does the regional transport strategy provide a robust analysis of the land-use proposals and the associated transport priorities outlined in the draft strategy?
- Are the transport priorities appropriately costed and satisfactorily identified in Appendix 6?
- Is the zero traffic growth target, a key policy of the draft strategy, credible in relation to the evidence base presented?
- Can the policies and priorities for developing the public transport network be realistically implemented during the lifetime of the draft strategy? And
- Is the strategy for a sustainable framework for freight distribution well enough developed?

\textbf{Does the regional transport strategy adequately indicate existing major transport arteries in the region?}

12.2. Because a critical consideration is the external connectivity of the region\textsuperscript{371}, we are convinced that the motorway and main line railway networks should be indicated on the Regional Key Diagram and on Diagram 6. Refer also to Chapter 1, paragraph 1.25, [R1.2].

\textbf{Does the regional transport strategy provide a robust analysis of the land-use proposals and the associated transport priorities outlined in the draft strategy?}

12.3. All previous analyses of land-use proposals, based on using past trend information, show significant traffic growth. Even if no more houses were to be built, there would still be a growing transport problem which would need to be addressed\textsuperscript{372}. It is proposed that the recently developed “Ptolemy” computer modelling tool\textsuperscript{373} be used for assessing the impacts of the land-use proposals and the associated transport priorities contained in the draft strategy.


\textsuperscript{371} Oral evidence of Mr David Nock on behalf of the Highways Agency and Mr Dale Oscroft on behalf of the Government Office.

\textsuperscript{372} Oral evidence of Mr Oscroft.

\textsuperscript{373} Oral evidence of Mr Nock and Mr Andrew Pritchard on behalf of the Assembly.
12.4. Ptolemy is a sub-regional interactive land-use and transport computer model and, as such, it does not fit particularly well with the standard Department for Transport compliance criteria for more conventional road traffic models. Moreover, as Ptolemy’s specification has had to be enhanced to allow it to be used on analysis of income segregation on the transport innovation funding project in the Three Cities Sub-area, it has had to meet additional compliance standards. Therefore a delay has occurred in the final sign-off of the model but all approval formalities were expected to be completed by the middle of August 2007. Confidence in Ptolemy is growing following good experiences from the use of a similar model in the West Midlands.

12.5. Although it is said that Ptolemy modelling is not likely to identify any substantially different priorities from those highway schemes already included in the Highways Agency’s targeted programme of improvements, we see this as an expression of hope rather than fact. From initial policy testing on two housing and two employment areas, the results are encouraging, but not yet conclusive with regard to supporting the regional transport strategy’s key policy to reduce traffic growth to zero over the plan period.

12.6. Even more fundamentally it has been acknowledged that none of the land-use proposals in the draft strategy have yet been modelled alongside related transport priorities as required by PPS11.

12.7. We fully accept the basic reasoning in the draft strategy that more concentrated developments should help reduce traffic levels. However, we would have expected that land-use and associated transport proposals would have been analysed together, at both the micro and regional level, to demonstrate that the overall regional transport strategy policies are robust. For example, we would have liked to have understood what specific transport proposals are intended to serve principal urban area housing extensions in the Three Cities Sub-area and the identified growth points and what the resulting impacts would be.

Are the transport priorities appropriately costed and satisfactorily identified in Appendix 6?

12.8. Appendix 6 is a key part of delivering the draft strategy and it has been compiled in accordance with the Department for Transport’s Guide to Producing Regional Transport Strategies. Priorities have been driven by the available funding profile and the need to start reducing traffic growth in the first five year plan period.

12.9. Investment priorities included in Appendix 6 substantially comprise those derived from the Highways Agency’s targeted programme.

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374 Ptolemy: An EiP panel briefing note 12 July 2007 and oral evidence to the examination by the Highways Agency.
375 Oral evidence to the technical seminar by Mr Nock.
376 Oral evidence of Mr Nock.
377 Oral evidence of Mr Pritchard.
378 As required by PPS11 paragraph 7.
379 PPS11, Annex B.
380 Pre-examination statement of the Assembly.
381 Core document TRA3.
382 Oral evidence of Mr Pritchard.
Chapter 12 – Regional Transport Strategy

Appendix 6 is not a “wish list” and all the schemes listed in it have been commented on by the Secretary of State. The decision as to which schemes to include in the £5 million plus category in the regional funding allocation was made in the region. However, the priorities listed in Appendix 6 can only be considered as indicative until, in due course, all included schemes have been subjected to a common means of assessment in accordance with Department for Transport criteria. There is an initiative underway by the Department for Transport to subject in future both road and rail projects to a common means of assessment.

12.10. Historically Appendix 8 of the approved RSS has proved useful in lobbying Network Rail and franchisees to secure transport improvements, such as the Lincoln to London rail service. If Appendix 6 was to be removed from the draft strategy then this valuable lobbying tool, which establishes clear objectives and commitments, would be lost.

12.11. We share the concern expressed by many that the priorities listed in Appendix 6 relate to regional transport strategy objectives rather than to specific land-use proposals set out in the draft strategy. It would seem to us more meaningful if, as suggested by the Government Office, the benefits arising from implementing the transport schemes in support of the draft strategy were identified. Although we accept that some schemes have “leap-frogged” others since the adoption of RSS, supporting the contention that Appendix 6 is not simply a re-casting of RSS, it appears to us that, for the most part, they are simply a re-statement of existing pipeline projects. We consider that to comply with PPG13 only committed schemes should be shown in the first five year category of Appendix 6, otherwise expectations will be falsely raised.

12.12. We agree that beyond the first five year period it is futile to plan in too detailed a fashion as priorities will constantly change. We are persuaded of this as, for example, some bypass schemes proposed many years ago if built now would not result in sustainable development, and some road improvements listed in structure plans have still not been delivered. Had some of these projects been constructed they may well have dictated where development should happen, in a quite contrary way to the process envisaged in the draft strategy. However, we accept that just because schemes are long standing, this does not necessarily make them any less important. We are wary also of developments proposed

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383 Oral evidence of Mr Pritchard.
384 Letter to the Assembly and emda dated 6 July 2006, Core document GEN17.
385 Oral evidence of Mr Oscroft.
386 Oral evidence of Mr Nock.
387 RSS8: Regional Spatial Strategy for The East Midlands (RSS8), Core document REG2.
388 Oral evidence of Mr Pritchard.
389 Pre-examination statement of the Government Office.
390 Oral evidence of Mr Pritchard.
391 Pre-examination statement of South Holland District Council.
392 Oral evidence of Ms Joanne Russell on behalf of the Home Builders’ Federation and Mr Jim Froggatt on behalf of the East Midlands Transport Activists’ Roundtable.
393 Oral evidence of Ms Russell.
394 Pre-examination statement of the Government Office.
395 Oral evidence of Mr Nock.
largely to fund cherished road schemes; see also Chapter 14, paragraphs 14.39 and 14.40.

12.13. In our opinion other projects in Appendix 6, labelled “under investigation”, require much greater clarity with regard to their programme status. We accept the suggestion that Appendix 6 should be accompanied by a comprehensive implementation framework, which should be subject to a close monitoring and review process.

12.14. We have been told by several local authorities that they consider some projects, which are critical to development of their area, are missing from Appendix 6. They have said that if these schemes are not properly identified then it will be difficult for them to begin negotiations with interested developers regarding infrastructure contributions. These local authority representations need to be further assessed.

12.15. We are concerned that the regional transport strategy presents no analysis of the funding required to deliver transport priorities and no demonstration that these priorities can be realistically implemented over the lifetime of the plan. We consider that information on funding should take account of possible developer contributions and that the funding analysis provided should go beyond simply identifying funding approval mechanisms.

12.16. It has been suggested that all development options should be considered to start as equal, but the ones that deliver a sustainable transport corridor should then be the ones that are preferred. Whilst this approach sounds attractive initially, we do not consider that transport solutions should drive land-use allocations. Rather an iterative approach should be adopted to jointly assess proposed development and associated transport priorities.

Is the zero traffic growth target, a key policy of the draft strategy, credible in relation to the evidence base presented?

12.17. The key policy of the regional transport strategy is an “at least” zero rate of traffic growth target in the region by the end of the plan period. This target is considered to be the minimum to achieve the draft strategy objectives, and it originated from the sustainability appraisal which identified that the current rate of traffic growth could be a potential barrier to meeting national CO₂ emission targets. If this target is not met, then it is said that the level of future development in the region may have to be reduced, but we find this difficult to accept.

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396 Pre-examination statement of the Highways Agency.
397 Oral evidence of Mr Mike Haydn on behalf of Chesterfield Borough Council, Mr Pete Price on behalf of Derby City Council and Mr Dave Armiger on behalf of Rushcliffe Borough Council.
398 As required by PPS11, Annex B, paragraph 8.
399 Oral evidence of Ms Russell, Dr Douglas Hart on behalf of Arlington Securities and Mr Bob Woolfe on behalf of Peel Investments.
400 Oral evidence of Ms Russell.
401 Policy 43 of the draft strategy.
402 Pre-examination statement of the Assembly.
12.18. Although the cost of motoring has decreased in real terms\textsuperscript{403}, recent study shows that the economic costs to the region caused by congestion are just under £1 billion per year\textsuperscript{404}. We agree that this is something that cannot be ignored. The East of England RSS panel report\textsuperscript{405} gave a strong steer that in future people must use cars less. It has to be assumed that zero growth is achievable otherwise the implications in terms of climate change etc. are not compatible with sustainable communities. As something has to be done with regard to modal shift a challenging target should be set. Hence it is preferable to set a zero target than only a gradual reduction target, as was the case in the approved RSS\textsuperscript{8}. However, it is acknowledged this zero target is aspirational; it has been established from other considerations rather than by any analysis\textsuperscript{406}.

12.19. It has been suggested that the zero target is not challenging enough\textsuperscript{407} and that an even more radical approach is needed. Some have said that the target is realistic\textsuperscript{408} and that the setting of a vision and a long term strategy is welcome\textsuperscript{409}. However, most believe that the target is extremely challenging\textsuperscript{410} as even with well planned development people will still want to use their cars. As a consequence, further modest traffic growth is inevitable and zero traffic growth is inconsistent with the amount of new housing identified in the draft strategy\textsuperscript{411}.

12.20. Travel to work patterns need to be dealt with across the board and not just in terms of new development\textsuperscript{412}. There are some signs that these patterns are changing and it is possible that by 2026 a large percentage of workers may work from home and thus make a large dent in commuting figures. Some companies that previously were located on business parks on the periphery of urban areas now appear more willing to re-locate into urban centres because better public transport connectivity is available\textsuperscript{413}.

12.21. The Highways Agency, whose responsibility it is to improve the motorway and trunk road network for national rather than regional reasons, is concerned about continuing pressure on the motorway and trunk road network. There is no dispute that projects such as the M1 widening will increase traffic in the region from sources outside the region and we wonder what effect this will have on regional traffic growth. Volumes of traffic entering the motorway network within the region can be influenced by controls at motorway junctions, but such measures cannot

\textsuperscript{403} Oral evidence of Mr Nock.
\textsuperscript{404} Oral evidence of Mr Steve Harley on behalf of emda.
\textsuperscript{405} Panel report on the East of England examination in public, Core document OREG8.
\textsuperscript{406} Oral evidence of Mr Pritchard.
\textsuperscript{407} Pre-examination statement of the Council for the Protection of Rural England (CPRE).
\textsuperscript{408} Pre-examination statement of Lincolnshire County Council.
\textsuperscript{409} Oral evidence of Mr Harley.
\textsuperscript{410} Pre-examination statements of Nottinghamshire County Council, East Midlands Airport, South Holland District Council, Addleshaw Goddard and Pegasus Planning Group and oral evidence of Mr Nock.
\textsuperscript{411} Pre-examination statement of Leicestershire County Council.
\textsuperscript{412} Oral evidence of Mr Nock.
\textsuperscript{413} Oral evidence of Mr Nock and Ms Russell.
control volumes of traffic already on the network, which has its origins and destinations outside the region\textsuperscript{414}.

12.22. The Department for Transport estimates road traffic volumes throughout England for eleven vehicle types, including freight vehicles levels\textsuperscript{415}. This data set is invaluable for understanding trends but is unreliable below regional level.

12.23. Table 7.2 of the annual monitoring report\textsuperscript{416} for 2005/06 shows that, in the five years between 1999 and 2004, traffic rose by 10.9% in the East Midlands. Over this time, the annual rate of increase ranged from $-0.3\%$ to 3.8\%, but the average rate of increase was just under 2.1\%. The previous annual monitoring report for 2004/05\textsuperscript{417} showed that between 1994 and 2004, the East Midlands had the highest level of traffic increase of any region in England, at over 25\%\textsuperscript{418}.

12.24. The latest information for the East Midlands from the Department for Transport indicates that in the twelve months 2004/05, traffic fell by 0.25\%. This information became available only after the draft strategy was published and changes the picture slightly in relation to the region’s absolute rate of increase over the last six years. It is too soon to tell whether these latest figures represent a “blip” (as appears to have been the case in respect of a similar reduction in 1999/2000) or the start of a new trend\textsuperscript{419}.

12.25. If there is no evident impact on traffic growth reduction after five years then either development will have to be reduced or traffic management measures will have to be increased\textsuperscript{420}. Significant employment sites could be constrained by inadequate road or public transport provision\textsuperscript{421}. To us this can only mean that, if land-use allocations and housing growth are not to be constrained, and if the zero traffic growth target is not going to be achieved, then public transport investment will have to be increased.

12.26. It seems to us that whether or not the zero growth target policy is correct, the rate of traffic growth reduction needs to be carefully monitored. To have no interim growth reduction targets over the plan period, no monitoring process and no fall-back contingency is, in our view, unsatisfactory. The Assembly has said that monitoring of the impact of land-use proposals on the transport network will happen as a matter of routine and any negative impacts of development will show up quickly. For example, the impact of development on the motorway and trunk road network will be continually assessed by the Highways Agency\textsuperscript{422}. However, there seems to us to be a consensus that a careful monitoring

\textsuperscript{414} Oral evidence of Mr Nock.
\textsuperscript{415} The Government Office: How the National Road Traffic Estimates are made.
\textsuperscript{416} Annual monitoring report 2005/06, Core document REG53.
\textsuperscript{417} Annual monitoring report 2004/05, Core document REG47.
\textsuperscript{418} Letter from the East Midlands Regional Assembly to the examination panel dated 23/07/07, Core document EXAM46.
\textsuperscript{419} Letter from the East Midlands Regional Assembly to examination panel dated 23/07/07, Core document EXAM46.
\textsuperscript{420} Oral evidence of Mr Pritchard.
\textsuperscript{421} Pre-examination statement of Erewash Borough Council.
\textsuperscript{422} Oral evidence of Mr Pritchard.
approach is essential but, as gathered data can be erratic, a five year interim assessment period would probably be appropriate.

12.27. We do not doubt that there are good examples within the region of the way in which traffic growth can be restricted. We accept that the majority of journeys will emanate from urban areas and it is these same urban areas that would be most likely to deliver public transport solutions to help deliver the zero growth target. In Greater Nottingham, traffic growth has been contained to within 1% on the local network through integrated packages involving trams, buses, and use of travel plans together with parking restraint measures. Actions arising out of transport innovation fund initiatives in the Three Cities Sub-area could greatly influence urban growth patterns if measures like these were to be introduced more widely. Projects like the work place parking levy scheme in Nottingham, which is now beginning formal consultation, could also contribute greatly to modal shift.

12.28. However, notwithstanding the recommendations in the sustainability appraisal concerning road user charging there are no proposals to introduce it throughout the East Midlands although the causes and effects of this are being studied. Moreover, we have no doubt that any national congestion charging system is so far off that it would have little, if any, effect over the plan period. In any event no evidence has been presented to demonstrate how any of the traffic management initiatives that are already underway could help deliver the zero growth target.

12.29. It is not disputed that there may well be growth in excess of the zero target in rural areas, and, for example, what happens in the Lincoln sub-region could have a negative impact in other parts of the region. In our view, some analysis should have been provided to determine the differing growth scenarios likely between the rural and urban areas, and the relative impact of these on the overall zero target.

12.30. We have interpreted the factors presented as providing justification for the selection of a zero traffic growth target as:

- something has to be done;
- a reduction in traffic growth in the East Midlands has occurred in the twelve months 2004/2005; and
- encouraging results have been obtained from initial policy modelling by Ptolemy.

These factors, in our opinion, do not constitute a strong analytical underpinning or a robust validation of the policy as required by PPS11. Our view on this is reinforced as there is no evidence to support the zero

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423 Pre-examination statement of Nottinghamshire County Council.
424 Non-technical summary, paragraph 140.
425 Oral evidence of Mr Nock.
426 Pre-examination statement of the Highways Agency.
427 Pre-examination statement of Addleshaw Goddard.
428 Pre-examination statements of the Highways Agency and Government Office.
target figure from other sources such as any similar reduction in traffic growth in other regions of England\(^{429}\).

12.31. It has been said that the draft strategy should not be hung up on the zero growth target\(^ {430}\). We have some sympathy with this view. With the amount of new housing already proposed in the draft strategy and the additional pressure for increased housing applied by the Housing Green Paper, given a choice, we think that the traffic growth target should be revised or abandoned.

**Can the policies and priorities for developing the public transport network be realistically implemented during the lifetime of the draft strategy?**

12.32. There is no dispute that, in order to achieve the zero growth target, there will have to be a substantial modal shift to travel by rail and by bus and that this will require a considerable increase in public transport investment\(^ {431}\). It was disappointing that none of the major land based public transport providers (although invited), who will have a key role to play in delivering the regional transport strategy, either submitted evidence or attended the examination.

12.33. In our opinion the need for modal shift is weakened in the draft strategy by the apparently heavy presentational bias given to road priorities in the regional transport strategy’s Appendix 6. Only a small proportion of committed projects identified in Appendix 6 are related to public transport improvements compared with the number of identified road improvement schemes\(^ {432}\). We find it difficult to understand how a project such as the upgrading of the West Coast main line could have a significant impact on modal shift at the regional and sub-regional level in the East Midlands, apart from providing an improved service pattern on the Northampton loop. We wonder if the inclusion of such projects creates an impression that there is a better balance between planned road and public transport priorities than exists in reality.

12.34. Many of the schemes supporting the regional transport strategy will be delivered at local level through the regional funding allocation process\(^ {433}\). We understand this, but we note that of the 12 schemes identified as “approved but not yet underway” in the regional funding allocation list, only one of these, Mansfield bus station, appears to support a modal shift to public transport.

12.35. We share the concern that the public transport network shown in Diagram 6 gives a distorted picture of the situation on the ground, as it does not reflect the reduced level of service in the evenings or at weekends\(^ {434}\). Comment has also been made that, although there are many examples of good working practices in the region, the present...

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\(^{429}\) Oral evidence of Mr Pritchard.

\(^{430}\) Oral evidence of Ms Russell and Dr Hart.

\(^{431}\) Pre-examination statement of Nottinghamshire County Council.

\(^{432}\) Sustainability Appraisal non-technical summary, paragraph 102.

\(^{433}\) Oral evidence of Mr Pritchard.

\(^{434}\) Pre-examination statement of CPRE.
arrangements for providing bus services do not tackle problems of inter-
urban and inter-sub-regional connectivity.  

12.36. There is common acceptance that public transport schemes have
to be factored in to development proposals from the outset and that
retrofit does not work. Developers have suggested that bus schemes
are more easily fundable and probably quicker to deliver through s.106
obligations, than highway infrastructure. Moreover, bus schemes
provide better flexibility to allow upgrading at a later stage.

12.37. There is also consensus that changes in travel behaviour will only
happen when the reliability and comfort of all public transport services
reaches an acceptable standard and that people’s views are influenced
more by reliability than by cost, as time is a key factor in their
considerations. Travellers are happier to use public transport for shorter
journeys but, due to difficulties encountered with having to make multiple
connections, they seem to continue to choose to use their cars for
distances over 150 miles.

12.38. Changing perceptions and attitudes will take a long time. It has
been said that it takes some three to four years for people to recognise
that there is a bus service that can provide for their needs, but the better
the quality of user information the sooner will be the take up of
services. The quality of bus service information in the East Midlands is
poor. Park and ride facilities can reduce car dependency and congestion
in urban areas but they do not necessarily reduce travel outside urban
areas. People will drive long distances to park at railway stations where
they can travel by rail using cheaper advance booking fares. There also is
a need for integrated and simplified bus and rail fare structures.

12.39. Some have commented that the substantial increase in rail
subsidy has not yielded tangible improvement in the East Midlands. In
our view, given the lead time involved with heavy or light rail schemes
and the limited capacity for increasing patronage on most of the existing
rail network, the modal shift required in the region will largely have to
be delivered by a considerably increased number of better quality bus
services.

12.40. We fully understand that all of these additional services will be
provided in small increments all over the region, below the level of the
regional funding allocation threshold, through the local development plan
process. We accept that it would be very difficult to define this provision,
other than by setting policy guidance at the strategic level. We
appreciate that many initiatives are underway such as texting bus time-

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435 Pre-examination statement of Travel Watch East Midlands.
436 Pre-examination statement of South Derbyshire District Council.
437 Oral evidence of Ms Russell.
438 Oral evidence of Ms Russell.
439 Oral evidence of Ms Russell.
440 Oral evidence of Mr Stephen Abbott on behalf of Travel Watch East Midlands.
441 Oral evidence of Ms Bettina Lange on behalf of CPRE.
442 Oral evidence of Mr Abbott.
443 Oral evidence of Mr David Thornhill on behalf of Nottinghamshire Transport 2000.
444 Oral evidence of Mr Jim Froggatt on behalf of East Midlands Transport Activists’ Round
   Table.
445 Oral evidence of Mr Pritchard.
tables and provision of real time passenger information. We realise that objectives such as the development of bus priority routes in Nottingham are reflected in the local transport plan process and are not identified in Appendix 6. We are nonetheless extremely concerned that “soft” measures to encourage modal shift, which have been around for some time, seem to have been ineffective. The regional transport strategy appears to rely largely on substantially increased bus service provision which is an approach that seems to have failed, notwithstanding the improvement opportunities available through the Transport Act 2000 such as bus quality contracts and bus quality partnerships.

12.41. Because of the small scale of these improvements, delivery will be in the hands of local authorities who will be responsible only for their own patch. We accept that bus de-regulation has caused difficulties with the provision of integrated services and consequently we wonder how the essential integration of public transport services will be achieved across the region. It seems to us that there has been no overall analysis of the quantum of public transport improvements necessary or proposals for any mechanism to coordinate and monitor their delivery, which we suggest has to be at the regional level.

12.42. We are particularly concerned to note from the Assembly’s annual monitoring report 2005/06 that, whilst the number of public transport journeys undertaken in 2005/06 was up on the number undertaken in 2004/05, it was down on the number undertaken in 2000/01. We have also noted that rail patronage has increased in the East Midlands by 60%, compared with a 38% figure for England as a whole. However, we would like to better understand these figures and we would prefer to see regional rail patronage dis-aggregated from the total rail patronage, which includes passengers who travel only through the region.

12.43. We understand that many bus infrastructure improvements will not be capital expenditure oriented and that it is not in the remit of the regional transport strategy to identify bus revenue priorities. However, concern has been expressed that some low capital cost projects have high revenue demands and that revenue funding can be subject to blocking by the Treasury. We would have liked to have seen evidence to indicate what the total expenditure has been on modal shift over the last five years and what level of modal shift would be required to achieve the regional transport strategy objectives. What order of total expenditure on public transport would be needed to deliver the regional transport strategy’s zero growth target, and from where would such funding come?

12.44. Such an analysis could provide some understanding of the scale of the problem to be tackled and the likelihood of it being solved. Without
such information, as is required by PPS11, it seems to us that the regional transport strategy is unconvincing.

12.45. We believe a much more radical approach is necessary and we consider that the Assembly’s own policy commentary in their annual monitoring report 2005/06:

“The national target of 12% growth in bus and light rail patronage is lower than the growth anticipated in road traffic over a comparable period and therefore represents a decline in the mode share of the former. It seems extremely unlikely that growth levels of the order necessary to achieve an actual increase in public transport mode share will occur without substantial changes involving both regulatory and financial reforms. The most effective reforms will require active support from Government, involving changes to the transport and planning regimes, as well as in other area of activity”

goes to the heart of the matter and in fact provides robust contradictory evidence that the modal shift necessary is likely to be achieved. We understand why the view has been expressed that it might be better to set modal shift targets rather than traffic growth reduction targets454.

12.46. We accept that should the Draft Local Transport Bill, May 2007 be implemented some of the above uncertainties, regarding delivery mechanisms, would be resolved455. Irrespective of this, the Government needs to recognise that whether or not new road building is indeed to remain a last resort measure a major investment in public transport will be essential to support its housing growth agenda.

Is the strategy for a sustainable framework for freight distribution well enough developed?

12.47. Much has been said about the importance of freight to the economy of the region456. Improving access to the east coast ports has been presented, in part, as justification for some major highway priorities such as the A14 improvements. We are puzzled by the acknowledgement that there is very little understanding of existing freight movements457, and that there has been no assessment of the impact on traffic growth by transferring freight from road to rail458. We believe that this should have been examined in more detail, possibly through the Department for Transport road traffic estimates which provide data on different freight vehicle types. We consider that the regional transport strategy should have set out some methodology for monitoring freight traffic as a separate element of the overall zero traffic growth target.

Conclusions

12.48. In summary, we see that the regional transport strategy’s key policy is to focus on a target of zero traffic growth. This target will be delivered by an unquantified amount of modal shift driven by a very

454 Oral evidence of Ms Lange and Mr Ian Stuart of DNS Stuart on behalf of Jesus College.
455 Oral evidence of Mr Oscroft.
456 Pre-examination statement of emda.
457 Oral evidence of Mr Nock and Mr Pritchard.
458 Oral evidence of Mr Harley.
considerable number of unidentified and uncosted public transport projects. These projects will comprise mostly bus schemes but will also include the introduction of as yet unproven urban traffic management interventions.

12.49. Although we appreciate why a zero growth target has been selected, we question whether the future development of the East Midlands should depend on achieving a target that has been derived in such an apparently arbitrary way.

12.50. We consider that there is insufficient evidence to demonstrate how the policies and the priorities in the regional transport strategy support the draft strategy. In our opinion, the expressions of growing confidence we have heard fall far short of the strong analytical underpinning required to support the policies. We also are of the view that the analysis of transport priorities and related land-use proposals is not sufficiently robust, and that it is unsatisfactory that there is no demonstration that funding is available to realistically implement the regional transport strategy over the lifetime of the plan.

12.51. Our overall conclusion is that the regional transport strategy requires a comprehensive reappraisal covering all of the issues discussed above.

**Recommendations**

12.52. **We recommend** [R12.1] that the regional transport strategy element of the draft plan be accepted on an interim basis only to allow the remainder of the plan to proceed to publication and that a comprehensive reappraisal of the regional transport strategy should be undertaken. We think it would be helpful if we set out a possible methodology for such a reappraisal which, if undertaken in this fashion would, in our view, provide us with a much more satisfactory evidence base. This is described below.

12.53. The robustness of the transport proposals in support of the draft strategy needs to be tested and we believe that the first five year plan period would be a sensible time scale over which to do this. Our view is that it would not be prudent to embark on any longer term analysis until the draft strategy’s fundamental concepts have been ratified.

12.54. The priorities set out in Appendix 6, covering the first five year plan period, need to be re-examined. A clearer understanding has to be established with regard to what the transport priorities will deliver by way of supporting land-use allocations and in particular housing growth. There has to be further consultation with local authorities to identify which of their transport schemes they consider are really critical to the delivery of land-use allocations in their area. Thereafter the priorities and the associated costs stated in Appendix 6 should be re-compiled in terms of committed transport interventions. With regard to costs we suggest that some estimate of the likely level of private sector contributions to infrastructure development needs to be established. The land-use proposals and associated committed transport priorities should be modelled together to identify the impact on traffic growth reduction.

12.55. Several actions are necessary with regard to the traffic growth reduction target:
a profile of projected traffic growth reduction should be established over the period of the plan and we suggest that setting interim targets at the end of each five year period would be appropriate;

an assessment should be undertaken as to what constitutes traffic growth in the region. As we see it, there are two relevant components of traffic growth. Firstly, there is the growth that arises from activities within the region, and secondly there is traffic growth in the region that occurs as a result of activity elsewhere. This requires differentiation;

an overall traffic growth reduction target at regional level is too blunt an instrument and we suggest that the additional setting of sub-regional targets is necessary;

effort needs to be committed to obtain a better understanding of freight traffic movements in the region and how the expected growth in freight movement would influence overall traffic growth figures; and

to inform the above actions additional and improved gathering of traffic data will be required.

12.56. The land-use and transport modelling results should then be compared with the revised five year traffic growth reduction targets and corresponding growth reduction profile at the regional and sub-regional level.

12.57. It seems to us that the outcome of this comparison could result in three possible scenarios:

scenario 1, the results could be on target;

scenario 2, the results could be adrift, but not substantially adrift from target; or

scenario 3, the results could be substantially adrift from target.

**Scenario 1: the results could be on target**

12.58. In the unlikely event that this is the resulting scenario, no corrective action would be required.

**Scenario 2: the results could be adrift, but not substantially adrift from target**

12.59. As the regional transport strategy envisages a substantial element of modal shift this scenario seems to us to be a much more realistic possibility. However, to determine whether this scenario is credible or not, it would first be necessary to establish the magnitude of the modal shift required and the quantum of investment in public transport to achieve it. In establishing modal shift targets we suggest that the same sort of detailed assessment should be undertaken, as we have already suggested as being necessary to better understand traffic growth reduction targets. This would include setting a modal shift target profile at five year intervals, dis-aggregation of through regional figures and regional and sub-regional target differentiation.
12.60. To appreciate the likelihood of achieving the necessary modal shift and associated investment required, it would be essential to benchmark these figures against, for example, what has been achieved in terms of modal shift and at what cost over the last five years. In establishing the cost, regard should be paid to the emerging funding mechanisms that are on trial in Nottingham. We are also acutely aware of the sort of proposals that have been set out in the Draft Local Transport Bill and we would suggest that these measures should be factored in as a supplement to any cost estimate analysis.

12.61. Although we understand why the Assembly has said that responsibility for delivery of modal shift rests largely with local authorities, we do not accept that control and monitoring of such a vital component of delivery of the draft strategy can be completely devolved. Delivery of essential integrated public sector transport improvements will require substantial coordination and in our view some means has to be introduced for an executive body to have a “hands on” responsibility in this delivery.

12.62. Having established whether or not the degree of modal shift required is likely to be achieved, then a decision should be made on the appropriateness of the extent of the planned land-uses. This may result in some iterative analysis.

**Scenario 3: the results could be substantially adrift from target**

12.63. Again this scenario seems to us to be a distinct possibility. If this indeed is the outcome of the modelling exercise then there are several options:

- as with scenario 2 it would be necessary to establish the magnitude of the modal shift required and the quantum of investment in public transport to achieve it;
- if the magnitude of modal shift and associated investment is far beyond realistic investment expectations then, as with scenario 2, land-use plans may have to be throttled back; or
- a more radical approach may be required which might involve either reconsideration or abandonment of the traffic growth reduction target and the setting of modal shift targets as an alternative.

12.64. **We recommend** [R12.2] that a review of the regional transport strategy should be undertaken when the reappraisal has been completed.

**Recommendations**

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Chapter 13: Milton Keynes and South Midlands Sub-Regional Strategy

Milton Keynes South Midlands Sub-Regional Strategy; scope of the Panel considerations of the Milton Keynes South Midlands sub-region; Northampton Implementation Area housing figure; North Northamptonshire and West Northamptonshire housing figure 2021-26; issues regarding the Upper Nene Valley gravel pits pSPA; joint working approach; Rugby Radio Station.

Milton Keynes South Midlands Sub-Regional Strategy

13.1. The Milton Keynes and South Midlands Sub-Regional Strategy\(^{459}\) was adopted by the Secretary of State in March 2005. It provides guidance for the whole of the Northamptonshire, and constituted a revision to RSS8. The Introduction, Part A and Part B for Northamptonshire were reproduced in the approved RSS8.

13.2. The Government Office has advised\(^{460}\) that the Milton Keynes South Midlands Sub-Regional Strategy will be revised as a separate document and its monitoring will take place in a wider inter-regional scope. It was argued that the matters regarding the housing provision could be looked at within this process. The review timetable was originally intended to be on a five year basis, although as yet no project plan has been drawn up for the review. We see the Milton Keynes South Midlands Sub-Regional Strategy as an important planning tool, providing guidance that looks across the traditional regional boundaries to consider the linkages and interactions between regions. The Government should make clear its intention for this strategy as soon as possible to provide some certainty to the future planning of the area. We believe the Milton Keynes South Midlands Sub-Regional Strategy plays a useful role in the strategic planning of this and neighbouring regions, and \textbf{we recommend} [R13.1] it is carried forward to review within an appropriate timescale.

Scope of the Panel considerations of the Milton Keynes South Midlands sub-region

13.3. As is stated in the draft strategy, the guidance for this sub-region remains largely unaltered by this review of the approved RSS8, with the changes comprising two alterations to the housing provision. At the time the draft strategy was submitted (September 2006) work was still underway in relation to a proposed housing figure for the Northampton Implementation Area 2001-2026. This technical work was completed by the Assembly, and the finalised proposed amendments to the Milton Keynes South Midlands Sub-Regional Strategy went out for consultation in December 2006.

13.4. In our consideration of this sub-region we have therefore taken the proposed amendments to RSS8 put forward by the Assembly as being those within the December 2006 consultation\(^{461}\). This includes

\(^{459}\) Core document REG51.
\(^{460}\) At the examination.
\(^{461}\) Letter from the Assembly to consultees dated 8 December 2006.
amendments to Northamptonshire Policy 1 and the second and third paragraphs of Northamptonshire Policy 2.

13.5. We therefore concentrate on the issues of the housing provision for North and West Northamptonshire housing market areas 2021-2026 (the roll forward), and the Northamptonshire Implementation Area housing provision 2001-2026. The Government Office confirmed to us that from their perspective these were the two issues that they were concerned with. They note that the figures for Northamptonshire up to 2021 were examined in public in 2004, and in their view there was no reason to doubt their validity for use as minimum district figures.

13.6. As can be seen, we have a limited scope in reviewing the guidance for this area, due in part to the restricted nature of the consultation carried out by the Assembly. Initially, the only element due to be examined was the housing provision for Northamptonshire for the period 2021-2026 to bring the housing provision in line with the rest of the region. The scope of our examination was broadened by the successful legal challenge to the adoption by the Secretary of State of the Northampton Implementation Area housing provision. Given the resultant policy gap that arose, it was deemed appropriate for this examination to examine this issue.

13.7. In terms of the principle of rolling forward the housing figures to 2026, the Assembly considered it important that there was a consistent end date in the draft strategy for all parts of the region. We agree that given the importance of the Milton Keynes South Midlands sub-region in terms of its growth potential it would be inappropriate for Northamptonshire to have a shorter timescale in terms of housing provision than the rest of the region. We therefore consider it appropriate that the draft strategy should include housing provision for Northamptonshire up to 2026 in line with the rest of the housing figures.

**Northampton Implementation Area housing figure**

13.8. Adjustments are proposed to the Northampton housing figure for 2001-2006 and also the 2011-16 and 2016-21 figures from that in the original MKSM SRS Northamptonshire Policy 1. We were told that the additional housing was to allow for the 1,500 additional houses sought, bringing the total up to 31,500 in the period 2001-2021. As it is more difficult to achieve this additional housing before 2011, it has been added to the later part of the plan period, with the 2021-2026 period then reflecting the earlier five year period (8,875 over the five year period).

13.9. The figures in the first five year band (2001-06) have also been altered to reflect the completions that have actually occurred over that period. This approach could have been carried out for the other districts’ housing provision, but given that their 2001-2021 figures are not proposed for amendment within this review, we do not consider it
appropriate to recommend any amendment prior to a review of the Milton Keynes South Midlands Sub-Regional Strategy as recommended below.\textsuperscript{465}

13.10. In terms of the overall provision proposed between 2001-26 the Baker Report\textsuperscript{466} provides the background justification for the inclusion of this figure. We have not seen any evidence that would lead us to conclude that this report is not sound. We do not agree with the view that the housing provision should be increased in line with 2004 household projections, to maintain the so-called “MKSM effect”\textsuperscript{467}. It was pointed out\textsuperscript{468} that the Milton Keynes South Midlands Sub-Regional Strategy was very policy driven, and although it is feasible to take account of the latest demographic forecasts, the simple roll-forward approach taken in the draft strategy is appropriate. As long as the roll-forward is in line with the Sub-Regional Strategy approach Northamptonshire County Council considers that there is no need to reopen the debate.

13.11. Some participants at the examination argued that given the higher than expected level of job creation in Northamptonshire over the last few years, the housing figures should also increase to reflect this growth. The Baker Report questions whether this growth can continue indefinitely\textsuperscript{469} and we would also raise questions over whether this growth can continue in the long term.

13.12. We note that the Milton Keynes South Midlands Sub-Regional Strategy policy driven approach is based on linking key infrastructure and employment figures in line with housing growth. We have not heard convincing evidence to divert from the approach of the Sub-Regional Strategy and to do so from the limited evidence we heard would undermine the previous examination process into the Sub-Regional Strategy. To significantly alter the housing figures for the Northern Implementation Area at this stage would impact on successful delivery of the growth already proposed, in terms of the work already started on delivering the provision since the Sub-Regional Strategy was approved.

13.13. Although we are recommending the updating of the housing figures outside of this sub-region in line with the 2004 projections, given our limited remit we consider there would be problems with doing this for the whole area and it would be inconsistent to do this for just the Northampton Implementation Area. However this should be carried out at the earliest opportunity as part of the full review of the Milton Keynes South Midlands Sub-Regional Strategy.

13.14. It is recognised that the 30,000 figure quashed by the High Court appears not just in Part B, Northamptonshire Policy 1 and 2, but also in Part A. \textbf{We recommend} [R13.2] appropriate adjustments be made to ensure consistency between Part A and B.

\textsuperscript{465} However, for illustration only, Table 1 in the Appendix to Chapter 4 shows what the effect would be at HMA level of taking account of completions 2001-6 in setting a figure for 2006-26.

\textsuperscript{466} \textit{Identification of a Replacement Housing Provision Figure for the Northamptonshire Implementation Area – Final Report}, November 2006 – Baker Associates, Core document HOU19.

\textsuperscript{467} See Pegasus Planning Group pre-examination statement for Ensign Group Ltd.

\textsuperscript{468} By Northamptonshire County Council.

\textsuperscript{469} Paragraph 5.15.
13.15. We note earlier the comments by the Government Office that the Milton Keynes South Midlands Sub-Regional Strategy is to be reviewed in its own right. Given the scope of that strategy, and that it deals with the wider growth issues, not just in Northamptonshire but also the other regions, we consider that any major review of growth potential in the area should occur in that forum. We have simply not heard sufficient evidence to provide a convincing case for altering the housing provision from the figures in the Sub-Regional Strategy.

13.16. We have only been asked to review the housing figures in the Milton Keynes South Midlands Sub-Regional Strategy; the rest of the Sub-Regional Strategy will still stand whatever our recommendation on the appropriate figure for the Northampton Implementation Area. Furthermore, we do not consider it appropriate to recommend a major change to the housing figure in isolation, without proposing changes to other parts of the Sub-Regional Strategy such as transport issues, social and environmental infrastructure etc. The Assembly referred to this point during the examination, stating that the partial review was to address the roll-forward and the legal challenge, and doing this in a way which did not impact on Part A of the Sub-Regional Strategy, which applies to the three regions. We agree with the approach they have taken.

13.17. **We recommend** [R13.3] that the total housing provision for the Northamptonshire Implementation Area in the period 2001-2026 is 40,375 and that the draft strategy should be amended as the Assembly propose in their December 2006 consultation with regards to Northamptonshire Policy 2.

**North Northamptonshire and West Northamptonshire housing figure 2021-26**

13.18. The Assembly proposes that the figure for the North Northamptonshire housing market area between 2021-26 is 2,795 houses per annum (13,975 over the five year period); while the figure for West Northamptonshire housing market area is 2,645 (13,225 over the five year period). These figures have been described as “the roll forward” as they simply take the same figures from the previous five year period and apply them to the 2021-26 period. The Assembly argues that the provision for North Northamptonshire is consistent with the policy approach set out in existing Milton Keynes South Midlands Sub-Regional Strategy, and it is noted that Policy 4 of the Sub-Regional Strategy provides an uncommitted planning assumption for 28,000 additional dwellings in the period 2021-2031, which if provided at a consistent rate within the period would provide 14,000 over the 2021-26 period.

13.19. Some participants considered that there should be provision in the latter plan period (2021-26) to make up for the under-provision in the 2001-06 period. We share the concerns raised regarding under-provision, but in line with our approach set down previously, any alterations of this kind should be carried out as part of a review of the Milton Keynes South Midlands Sub-Regional Strategy. Any under-provision should be made up at the earliest possible opportunity rather than being left to the later plan periods.
13.20. It was argued by some that the housing provision for Northamptonshire should be increased to take into account the latest household projections, and that the simple approach of rolling forward the housing provision may create a significant under provision in the area. We have commented above on the approach taken in the Milton Keynes South Midlands sub-region, and give our support to the policy based approach of the Sub-Regional Strategy. We have not heard any convincing evidence as to why this policy approach is not appropriate for the latter plan period, and therefore consider that the roll forward approach applied by the Assembly is appropriate. This provision in the latter plan period should be re-assessed in any review of the Milton Keynes South Midlands Sub-Regional Strategy. We recommend [R13.4] accordingly.

13.21. The Environment Agency raised concerns on water cycle infrastructure, and that any increases in the housing provision over that proposed at present may lead to an increased risk of environmental damage. They already have concerns over the delivery of infrastructure for the housing provision proposed up to 2021, with the practicality of getting that infrastructure in place. For the 2021-26 period work has taken place with the joint planning units to identify any issues that may arise. We have acknowledged in Chapter 8 that this infrastructure provision is a very important issue.

13.22. It was noted\textsuperscript{470} that Policy 14 and the supporting text seems to exclude East Northamptonshire in its title and description. The Assembly acknowledged that East Northamptonshire should be included, and agreed that an appropriate adjustment would be to rename the housing market area simply “North Northamptonshire HMA”.

**Issues regarding the Upper Nene Valley gravel pits pSPA**

13.23. The issue was raised as to whether the draft strategy should provide guidance on the proposed Special Protection Area around the gravel pits in the Upper Nene Valley that would encourage local planning authorities to produce supplementary planning documents with regard to the approach that should be taken to development. It was argued that given the inter-district nature of this issue, there should be common principles established, and the draft strategy was the appropriate place to highlight these concerns.

13.24. Given the limited remit we have been given with regards to alterations we can recommend to the Milton Keynes South Midlands Sub-Regional Strategy, we do not consider we can make a recommendation that this advice should be included in Part 2 of the draft strategy.

13.25. It was suggested\textsuperscript{471} that Policy 12 (Part 1) might be the appropriate place to require that local authorities produce supplementary planning documents regarding this site. Policy 12 already refers to the Upper Nene Valley gravel pits\textsuperscript{472} in its sixth bullet point. In our view this issue is best dealt with in the local development framework but we also

\textsuperscript{470} Oral evidence of Ms Rebecca Yee on behalf of Corby Borough Council.

\textsuperscript{471} By Natural England.

\textsuperscript{472} It is noted that Policy 12 should be updated to reflect the current designation of this site as a proposed SPA and Ramsar site.
recognise the advantages of a common approach to development around this site. It would not be appropriate to include a requirement for supplementary planning documents to be produced, but we suggest that further supporting text should be included to indicate that the issue will need to be addressed in a co-ordinated way at the local development framework level.

**Joint working approach**

13.26. We have already mentioned our approval of the way that joint working has been taken forward by some authorities in this area. The Milton Keynes South Midlands Sub-Regional Strategy has brought together regions to look at the wider picture and consider issues outside their own particular region. We would wish to see this continue and an early review of the Sub-Regional Strategy would continue this good start.

13.27. We also note how the Sub-Regional Strategy has brought local authorities within regions together, and pushed them towards joint working, which to our mind can only be a good thing, producing more sustainable solutions to the issues faced, and improve decision making. Joint core strategies are being produced in the Northamptonshire area which, we are sure, will bring many benefits and should be encouraged wherever possible.

13.28. Some concerns were raised by participants at the examination to this joint working approach. These included the difficulty in stimulating a meaningful debate with the community on housing market area figures rather than district figures, and the potential delay in prolonging the core strategy process whilst the housing market area figure is divided up. We understand these concerns, but still consider the benefits of joint working can far outweigh the disadvantages.

13.29. With regards to the housing provision figures, Northamptonshire County Council suggests that it would make sense to have a single housing market area housing figure rather than individual district figures. PPS11\(^{473}\) allows for this approach, and states that:

> "Where districts are preparing joint DPDs to cover a functional housing market area it may be appropriate for the RSS to provide a figure for that area, rather than for the individual districts, provided that the means of implementing the policy is clear."

13.30. The district figures in the draft strategy are a useful guide to the allocation of provision among the districts, and have been through the examination process in the Milton Keynes South Midlands Sub-Regional Strategy. However, in view of the advanced stage reached in the production of joint core strategies, and the policy exception set out above, we find there to be no practical value in district level figures being included in RSS. Indeed, it may unduly limit the opportunity for the consideration of alternative patterns of development in the examination of the core strategies and on the basis of a more detailed local evidence base.

\(^{473}\) Paragraph 1.5.
13.31. **We recommend** [R13.5] that the district figures are deleted from the draft strategy, leaving the housing market area figures only for the North Northamptonshire Housing Market Area and the West Northamptonshire Housing Market Area. The dividing up of these figures should then be left to the joint core strategies.

**Rugby Radio Station**

13.32. Although we are sure that the examination process should not look into site specific issues, the Rugby Radio Station site was discussed in the context of the need for joint working between the East Midlands and West Midlands Assemblies with regards to this location because the site straddles the regional boundary. The same issue was raised at the Milton Keynes South Midlands Examination in Public\(^{474}\), but since then it has been argued\(^{475}\) that there has been little progress on any joint working.

13.33. The two Assemblies have not ruled out looking at this site, but its development is only one of the options, with regards to growth around Rugby, should growth be needed.

13.34. Policy 18 of the draft strategy provides guidance on where housing market area joint working will be expected. We comment on this guidance in paragraphs 4.86-87 of our report. At this stage we do not consider that the draft strategy should include the requirement for joint working, but good planning practice would suggest that a regional boundary should not stop discussion as to the suitability of this site in the future if the strategy warrants this.

**Recommendations**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
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<tbody>
<tr>
<td>R13.1</td>
<td>13.2.</td>
<td>That the Milton Keynes South Midlands Sub-Regional Strategy plays a useful role in the strategic planning of this and neighbouring regions, and that it is carried forward to review within an appropriate timescale.</td>
</tr>
<tr>
<td>R13.2</td>
<td>13.14.</td>
<td>That appropriate adjustments be made to ensure consistency between the two Part A and B of the Milton Keynes South Midlands Sub-Regional Strategy.</td>
</tr>
<tr>
<td>R13.3</td>
<td>13.17.</td>
<td>That the total housing provision for Northamptonshire Implementation Area 2001-2026 is 40,375 and the draft strategy is amended as the Assembly propose in their December 2006 consultation with regards to Northamptonshire Policy 2.</td>
</tr>
<tr>
<td>R13.4</td>
<td>13.20.</td>
<td>The draft strategy MKSM Northamptonshire SRS Policy 1 should be amended in accordance with the amendments proposed by the Assembly in their December 2006</td>
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\(^{474}\) See paragraph 2.17 of the MKSM SRS Panel Report, Core document OREG17.

\(^{475}\) By Professor David Lock for David Lock Associates.
<table>
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<th>Recommendation Number</th>
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<tr>
<td></td>
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<td>consultations (although only total housing market area figures should be included in the table). This housing provision in the 2021-26 plan period should be re-assessed in any review of the Milton Keynes South Midlands Sub-Regional Strategy.</td>
</tr>
<tr>
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Chapter 14: The Three Cities Sub-Regional Strategy

The Three Cities growth point; the Nottingham - Derby Green Belt; Nottingham and its surroundings; Leicester and its surroundings; Derby and its surroundings; Burton, Swadlincote and Coalville.

The Three Cities growth point

14.1. The granting of New Growth Point status to the Three Cities attracted a great deal of criticism as to the details of where growth should, or should not take place but little as to its general principle. The principal criticisms in this regard are reported later in this chapter, but it can be said here that we consider the concept of the Three Cities as a growth point to be wholly in accordance with the overall strategy of concentration and generally acceptable. Indeed, growth point status should significantly assist in the provision of essential infrastructure for this strategically important proposal.

14.2. The New Growth Point agenda is not, in fact, a proposal of the draft strategy, though it could be, and so it is quite properly referred to in the supporting text\(^{476}\). We therefore recommend [R14.1] no change be made to the draft strategy in this respect.

The Nottingham — Derby Green Belt

The Green Belt around Nottingham

14.3. The Nottingham – Derby Green Belt encircles Nottingham and surrounds the towns lying between Nottingham and Derby but it constrains only the east side of Derby. In the draft strategy its retention is proposed in principle, but subject to review at the local level\(^ {477}\). Its review was in fact a requirement of the approved RSS8. Policy 14 of the approved strategy set out the components for the review, while Policy 16 made it clear that the review should be within the context of a sub-regional strategy for the Three Cities Sub-area.

14.4. This review of the whole Belt\(^ {478}\) was completed in August 2006. Its starting point was that the Green Belt, widely supported by the public as protection of the countryside, would remain. Nevertheless, a stated aim of the review was to reconcile the aims of the regional strategy in providing for new development in the Three Cities Sub-Region during the plan period\(^ {479}\).

14.5. The review carefully examined the boundaries of the Belt, sector by sector, marking them according to their value to each of the five green belt policy criteria – checking unrestricted sprawl, preventing neighbouring towns from merging, safeguarding the countryside from encroachment, preserving the setting and special character of historic towns and assisting

\(^{476}\) At paragraph 2.3.11.
\(^{477}\) Three Cities SRS Policy 2.
\(^{479}\) Ibid., paragraph 18.
in the recycling of derelict land. In our view, this methodology inevitably tended toward giving a higher score to the areas that satisfied more than one criterion. Moreover, implicit in its conclusions and recommendations is that the criterion of preventing neighbouring towns from merging is of greater value than safeguarding the countryside from encroachment. This is not explicitly stated in the Review itself, although the need to prevent coalescence is given priority in the draft strategy itself480.

14.6. While the published work is manifestly thorough and sound according to the remit set, its methodology permits the identification of areas for excision from the Belt in terms of Green Belt criteria only. It does not, nor does it attempt to, identify areas for development on the basis of all recognised sustainability criteria, including, for example sustainable accessibility.

14.7. The Planning White Paper481, published after the review, confirms the importance in national policy of Green Belts while advising that:

“To ensure that future development takes place in the most appropriate and sustainable locations it is also important that planning authorities should, where appropriate, continue to review Green Belt boundaries when they are drawing up their development plans, as current planning policy allows them to do, and as has already been undertaken in some areas.”

14.8. The Green Belt Review, rightly in our view, attempts to take account of the overall strategy of concentrating development in and immediately around the principal urban areas by allowing for urban extension to the south of Nottingham. But in not permitting the location of urban extension to be decided on the basis of all recognised sustainability criteria, it is in our opinion, insufficiently radical.

14.9. This leads us to the consideration of two options. The first option, which might be considered more in line with Government policy, is to leave the Green Belt as it is in the approved regional strategy, and to amend it only after a more thorough review embracing all recognised sustainability criteria has been undertaken.

14.10. The second option is the one which, in our professional opinion, will lead more easily and quickly to the most sustainable solution. This is to accept the Assembly’s view that the most important aspect of the Belt is to keep separate the urban areas of Derby and Nottingham and to recast the Belt so that, as regards Nottingham it becomes, as it were, the mirror image of Derby, providing for a generous green block – more than a wedge – separating the two cities of Nottingham and Derby. This would allow for necessary urban expansion to be planned on the basis of balancing all recognised sustainability criteria which do, of course, include the recycling of urban land, the avoidance of both urban sprawl and the profligate use of land resources.

480 In Three Cities Sub-Regional Strategy at paragraph 4.9 and in Policy 2.
14.11. We are not unmindful of the difficulties this will cause in terms of public perception, but in our considered professional opinion we believe it to be the right course.

14.12. While, in our opinion, the retention of the Belt between Nottingham and Derby is well argued, we do not see the same force in the very slim wedge between Nottingham and Hucknall. We see little strategic value in this area: what should become of the land concerned is, in our view, a matter for local planning.

14.13. We therefore recommend [R14.2] that the review required by Three Cities SRS Policy 2 be widened so that is not solely related to the Nottingham principal urban area and that in undertaking that review the Green Belt should be recast so as to provide a separation between Nottingham and Derby without surrounding the city of Nottingham.

14.14. Given this strategic steer, we expect the detailed boundaries to be settled in the course of the current round of local planning.

**Extending the Green Belt in South Derbyshire and North West Leicestershire**

14.15. The draft strategy permits, but does not propose, extension of the Belt to the south and south west of Long Eaton\(^{482}\). We see little of strategic value to the Green Belt in this area, and so recommend [R14.3] that reference to the extension of Green Belt in this area be excised.

**Nottingham and its surroundings**

**Location of sustainable urban extensions**

14.16. The draft strategy refers to substantial capacity in the Nottingham Principal Urban Area, but also to the need for a number of sustainable urban extensions. Particular controversy has been caused by a policy proposal to develop a “major sustainable urban extension to the south of Clifton”\(^{483}\). This one proposal attracted almost a quarter of all the representations made in respect of the strategy.

14.17. We have earlier made two matters clear:

that the location of urban extensions are for planning at the local level; and

that this is a matter for one or more local “core strategies” based on joint working by local authorities.

14.18. So notwithstanding the stalwart defence of the draft strategy by the Assembly\(^{484}\) we recommend [R14.4] that all reference to the location of a sustainable urban extension at Clifton be removed from the draft strategy’s policy and from the preceding spatial analysis.

14.19. We also recommend [R14.5] that the draft strategy be amended so as to state clearly that a full sub-regional study be undertaken jointly by the six local planning authorities in the Nottingham Housing Market Area. In implementing this recommendation we would expect the

\(^{482}\) Three Cities SRS Policy 2 and Part 2, paragraph 4.9.

\(^{483}\) Three Cities SRS Policy 4 and paragraph 5.13.

\(^{484}\) In their pre-examination statement and oral evidence of Mr Andrew Pritchard.
assistance of Nottinghamshire County Council as s.4(4) authority as necessary. The sub-regional study should review housing land availability and the need for and location of sustainable urban extensions and should have regard to all recognised sustainability criteria.

14.20. We are clear in our own minds that this is the right way forward in this area of sub-regional planning, and we note the willingness of the officers of the authorities in this regard.

14.21. In our view, friendly, co-operative joint working at the local level is much to be preferred to the imposition of a sub-regional strategy by the Assembly and Secretary of State through the medium of an “add-on” revision to the draft strategy.

Housing provision by district

14.22. Were it not for the national policy requirement that regional spatial strategies should set out the level of overall housing provision for each region, distributed among constituent housing market areas and individual local planning authority areas\(^{485}\), it would be sufficient to leave the distribution of the total for the Nottingham housing market area to the joint working by the six local authorities concerned. We are persuaded\(^{486}\), however, that figures are essential in order to satisfy national policy.

14.23. Examining the soundness of the distribution given in the draft strategy has not been so easy. In the first place, a revised Appendix 2 (Housing Provision) was tabled by the Assembly\(^{487}\). Then, in a “Joint Position Statement”, revised figures were agreed for the five local authority areas included in the principal urban area by the district councils concerned and the s.4(4) authority, Nottinghamshire County Council. These figures, reproduced below from the Joint Position Statement are based on a strategic housing availability assessment for the principal urban area\(^{488}\).

| Table 3: Calculation of PUA distribution based on whole RSS period (2001-2026) |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|
| Proposed Distribution            | Completions*    | Original RSS Annual Provision | Proposed New RSS Annual Provision |
| Nottingham                       | 1000            | 5032            | 945             | 1001            |
| Broxtowe                         | 168             | 646             | 170             | 160             |
| Erewash                          | 100             | 598             | 55              | 104             |
| Gedling                          | 227             | 1090            | 225             | 225             |
| Rushcliffe                       | 134             | 620             | 445             | 132             |
| Remainder                        | n/a             | n/a             | n/a             | 218             |
| PUA                              | 1641            | 7986            | 1840            | 1840            |

*See table 5.3 of Nottingham Principal Urban Area SHLAAA, 2007. In some instances the totals vary slightly from completions rates listed in tables 5.7 to 5.14.

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\(^{485}\) PPS3 “Housing”, paragraph 34.

\(^{486}\) By Mr Chris Bentley on behalf of the Government Office.

\(^{487}\) Core document HOU43.

\(^{488}\) Core document RES86.
14.24. Central to the land availability assessment is the urban capacity of the City of Nottingham, and in particular to deliverability of recycled land. This assessment was roundly challenged by various landed and building interests. We see some force in these representations in that the Nottingham Urban Capacity Study is some six years old, its methodology is questionable and that current market trends do not appear to favour small city centre apartments. Nevertheless, the annualised supply rate shown in the table above (1,000 dwgs/yr) does relate well to the current annual build rate in the City (also 1,000 dwgs/yr). If the finer points of calculating urban capacity are set aside in favour of a rough, but possibly more robust, approach based on a rate of urban recycling then, in our opinion, this figure is good enough for the broad brush of strategic planning. Indeed, it is to be hoped that, as the years go by, the rate of urban recycling will increase, rather than decrease, though we acknowledge that this is a hope rather than an evidenced forecast.

14.25. If one thing is clear, however, it is that our examination could not possibly audit the urban capacity study on a site by site basis in the timescale allowed.

14.26. Such a more accurate assessment may well be needed however for the more precise requirements of local planning. If so, it should be undertaken in consultation with the building industry, among others. For this reason, as well as the fact that the outcome of the recommended joint undertaking of a sub-regional study of the location of urban extension may affect the distribution to districts of the housing figures, we would not expect local planning to rely unequivocally on any of the figures produced so far except in default of agreement between the local authorities.

14.27. We are not convinced that the constraints in Broxtowe justify a reduction in this district’s annual allocation and we see no reason why the slightly increased capacity identified in Nottingham should result in diminution of the allocation elsewhere in the housing market area. The result of this will be of course slightly to increase the total for the housing market area, and increase plainly in accordance both with national policy and the generality of regional strategy. However we have no problem in accepting the Joint Position Statement increase for Erewash.

14.28. Nevertheless, it is clear to us that a major urban extension in the later part of the plan period is likely to be necessary, and in default of agreement otherwise, (but only in default) it should continue to be allocated to Rushcliffe.

14.29. We therefore recommend [R14.6] that the draft strategy be amended by the distribution to districts of the housing figures for the Nottingham Principal Urban Area part housing market area as follows:

489 Led by the Home Builders’ Federation.
490 Oral evidence Mr Tony Bateman of Pegasus Planning.
491 As urged in Broxtowe Borough’s representations and oral evidence.
<table>
<thead>
<tr>
<th>Area</th>
<th>Dwgs/yr in or adjoining PUA (1)(2)</th>
<th>Total dwgs/yr (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nottingham Housing Market Area (including Hucknall)</td>
<td>1945</td>
<td>2425(1)</td>
</tr>
<tr>
<td>Nottingham City</td>
<td>1000 (3)</td>
<td>1000</td>
</tr>
<tr>
<td>Broxtowe</td>
<td>170</td>
<td>270</td>
</tr>
<tr>
<td>Erewash</td>
<td>105 (5)</td>
<td>290</td>
</tr>
<tr>
<td>Gedling</td>
<td>225</td>
<td>310</td>
</tr>
<tr>
<td>Rushcliffe</td>
<td>445 (4)</td>
<td>555</td>
</tr>
</tbody>
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Notes: (1) these figures have not been adjusted from the 2003 based to the 2004 based projections; (2) partly from table at paragraph 14.23 above; (3) from Appendix 2 of draft RSS, Part 1 with the Nottingham total and grand total adjusted to the table above; (4) see column 4 at table in paragraph 14.23 above; (5) rounded.

14.30. **We further recommend** [R14.7] that the Nottingham part of Three Cities SRS Policy 4 should include a proviso that, in the event of the joint preparation of a core strategy producing a revised distribution of the housing market figure based on better evidence of the urban capacity of Nottingham and a revised locational pattern of urban extension, such revised figures should be used instead of the figures in the said policy.

**Leicester and its surroundings**

*The distribution of housing within Leicester Housing Market Area*

14.31. In this section of the report we consider in more detail the distribution of housing within the Leicester Housing Market Area as set out in Three Cities SRS Policy 4.

14.32. Somewhat unusually Leicestershire County Council has made representation\(^{492}\) that they wish to see the distribution amended. They have termed this “revised advice” but due to the late stage in the process the Assembly has not taken any formal view on the revised figures.

14.33. The revised advice derives in part from the conclusions of the Leicester Principal Urban Area Housing Land Availability Assessment\(^{493}\) and in part from more detailed assessment of the transportation implications.

\(^{492}\) Representation No. 831 dated 20.12.06, details in Appendix 3.

\(^{493}\) Roger Tym and Partners for Leicester City Council and Leicestershire County Council, Core document HOU48.
of proposed sustainable urban extensions as well as a sustainability appraisal.

14.34. Although the revised advice would not alter the overall provision in the Leicester housing market area of 3,780 dwellings per annum it would result in a marginal shift (35 dwellings a year) away from the principal urban area. This would be primarily because of an increase from 760 to 860 dwellings a year allocated to Charnwood including an increase from 195 to 320 dwellings a year (4,875 to 8,000 in total) for a sustainable urban extension at Loughborough. We note that the advice does not provide for a number of smaller urban extensions to Leicester and we do not consider these options.

14.35. We recognise concerns that the housing land availability assessment has not taken proper account of new development at Harborough and reservations concerning what may be somewhat conservative estimates for capacity arising from former employment sites outside the intervention areas. Nevertheless, this latter point is counter-balanced to a certain extent by the assumption of an above-trend contribution from brownfield sites in Leicester overall. There must inevitably be a degree of uncertainty in any assumptions about the contribution of previously developed land, including windfall sites, particularly in view of the nature of the housing market in central Leicester and the significant increase in the build rate for the city in the draft strategy. Even should urban capacity be higher than assumed, we agree that although this might affect the timing of delivery of the urban extensions they will still be required to meet the planned provision for the principal urban area. It is a matter of “when” not “if” and this should be shown in the housing trajectory.

14.36. The additional work undertaken by Leicestershire County Council to examine the sustainability of possible urban extensions is impressive. We are content that this work broadly supports the choice of locations to the west and north of the city in preference to alternatives put forward by various development interests, but the degree of locational specificity in paragraph 5.10 goes beyond what we think is reasonable to include in draft strategy. We recommend the deletion of the detailed locations included in brackets in that paragraph.

14.37. Whereas we would have no difficulty in accepting minor adjustments to the figures, where supported by evidence on sustainability

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496 Leicestershire County Council statement, 1,150 dwellings.
497 Government Office “Statement of Common Ground”.
498 Points raised by the Home Builders’ Federation and Redrow Homes.
499 1,180 dwellings per annum compared to an average completion rate of 852, 2001-6.
500 In the Tym report, Core document HOU50.
501 With David Lock Associates.
502 See also Chapter 4, paragraph 4.43 and [R4.6].
503 These include the Co-operative Group, David Wilson Homes, Miller Homes, Maximus, Stamford Homes and Persimmon Homes.
impact, the significant increase suggested for the sub-regional centre of Loughborough, which is not contiguous with the principal urban area, gives us cause for concern.

14.38. There is, firstly, the point of principle about the introduction of a major change at a late stage in the process\(^{504}\) without proper consultation with the local community. Secondly, the decision by the County Council appears to have been influenced by the recommendations arising from the transport studies which conclude that a larger urban extension will be required in order to fund an eastern bypass for the town to reduce congestion in the centre.

14.39. Quite apart from the very valid point about the lack of local consultation, it is evident to us that the options for the development of a self-contained development of an 8,000 dwelling extension to Loughborough would be limited\(^{505}\). We agree that, while transport is clearly an important element in considering sustainability, this has been given undue weight in the County Council’s conclusions.

14.40. The provision in the submitted draft strategy was drawn up after full consultation and provides much scope for all options to be considered through the local development framework process. There is a need to adjust the figures for the Leicestershire housing market area in order to reflect the 2004 population projections\(^{506}\) but other than that we do not agree to the revised distribution put forward by the County Council and we recommend \([R14.9]\) no change in this respect.

**The treatment of sub-regional centres in the Leicester HMA**

14.41. In Chapter 2 we have identified the differences between the sub-regions in the approach taken in Part 2 of the regional strategy. The Three Cities SRS Policy 4 has been drawn up following advice from three county councils and three unitary city councils. It is only in the section dealing with the Leicester housing market area that specific figures are given for provision below district level outside the principal urban area, i.e. to specify the size of sustainable urban extensions in the sub-regional centres of Loughborough, Hinckley, Melton Mowbray and Coalville.

14.42. The overall scale of development and expansion of the principal urban areas is a strategic matter which falls properly within the ambit of regional strategy. Where urban extensions are required which go beyond the administrative boundaries of the central (City) authority within the principal urban area then, in order to provide the necessary level of guidance for local development framework core strategies, a figure must be given for the proportion of the district provision which should be adjacent to the principal urban area. As in the Nottingham area we consider that although the figures given for each district abutting the Leicester principal urban area, that is the “PUA/non-PUA split”, are based on a credible evidence base and are acceptable at a strategic level, they will need to be reassessed through the local planning process taking account of the more detailed studies appropriate at that level.

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\(^{504}\) As raised by Charnwood Borough Council which covers Loughborough.

\(^{505}\) Oral evidence of Mr Guy Longley on behalf of Charnwood Borough Council.

\(^{506}\) See table attached to paragraph 4.6, Chapter 4.
14.43. We have strong reservations, however, about the value and necessity of including figures for sustainable urban extensions to the sub-regional centres. We recognise that this reflects the strengthening of the role of these centres as a part of the fundamental strategy of urban concentration but in our view adequate guidance for the local development framework process is given in Policy 4 in Part 1 of the regional strategy where the same centres are named in part c). We agree\(^{507}\) that there should be greater flexibility to allow the most appropriate pattern of development away from the principal urban areas to be discussed and tested through the examination of core strategies. If the most sustainable pattern is for one or more urban extensions of the sub-regional centres then that should be the outcome of the process which will also allow for full local involvement. We do not consider this should delay the delivery of these developments in view of the progress being made on core strategies nor is there reason to think it will result in dispersal to smaller settlements as that would run counter to the fundamental regional strategy. We therefore **recommend** [R14.10] the deletion of the figures in Three Cities SRS Policy 4 for sustainable urban extensions at Loughborough, Hinckley, Melton and Coalville and in relation to Hinckley, Melton and Coalville the words “should be a sustainable urban extension to” be replaced by “which should be directed towards.”

14.44. We agree\(^{508}\) that the wording in the section dealing with Harborough is misleading and confusing. It appears to be inconsistent with paragraph 5.2.18 of the Housing Policy Justification Paper\(^{509}\) which states that there is not to be any major development either adjoining the Leicester principal urban area or Market Harborough although the main focus is on the latter. **We recommend** [R14.11] the deletion of the words “of which should be within or adjoining Leicester PUA and”.

14.45. We accept that there is clearly a need for the scale of development at Hinckley to recognise and take account of development across the regional boundary in nearby Nuneaton but consider that this cross-boundary issue is most appropriately dealt with in discussion on local development framework core strategies, taking account of the test of soundness (vi) in PPS12\(^ {510}\).

14.46. The final paragraph of the Leicester section of Three Cities SRS Policy 4 refers to the development of urban extensions in the same sub-regional centres. As we discuss below, in the context of Three Cities Policy 3, we consider that paragraph 4.12 is sufficient and **we recommend** [R14.12] deletion of the final paragraph of this section of Three Cities SRS Policy 4.

**Green wedges**

14.47. Green wedges have a long history in Leicestershire and they are provided for in Strategy Policies 5 and 6 of the adopted Structure Plan\(^ {511}\). There is general support for their continuation but that does not mean to

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\(^{507}\) With Charnwood Borough Council and Harborough District Council.

\(^{508}\) With Harborough Borough Council.


\(^{510}\) See PPS12, paragraph 4.24.

\(^{511}\) The Leicestershire, Leicester and Rutland Structure Plan, Core document DP9.
say that regional strategy, even sub-regional strategy, is the right place for a policy relating to them.

14.48. Green wedges do not have the national policy status of the Green Belt and it seems to us that there is justifiable concern that they should not be regarded as unduly restrictive and must be subject to review in order to accommodate new development.

14.49. The Three Cities SRS Policy 3 as it stands in the draft strategy is somewhat contradictory. On the one hand it indicates that the existing wedges shown on the spatial diagram “will be maintained” and the objectives, particularly b), are somewhat similar to those for the Green Belt. On the other hand, the policy also provides for review of the detailed boundaries through local development documents as well as suggesting in the final paragraph that new ones should be defined.

14.50. We accept that green wedges are not “local landscape designations” as referred to in PPS7 but they are essentially a local policy tool. Green wedges clearly fulfil a useful function in helping to define the structure of urban areas. However, we consider that the justification for the retention of existing green wedges, as well as for the creation of new ones in association with new development and urban extensions, should be a matter for local development framework core strategies in the context of draft strategy Part 1 Policy 4. They need also to be related to green infrastructure in the terms of Policy 27.

14.51. **We recommend** [R14.13] the deletion of Three Cities SRS Policy 3 but that paragraph 4.12 should remain with the addition of a sentence to state “A review of existing green wedges or the creation of new ones in association with development will be carried out through the local development framework process.”

**Derby and its surroundings**

*Has the urban capacity of Derby been adequately addressed?*

14.52. The urban capacity study for Derby follows DCLG practice guidance, and is generally reckoned to be better than its Nottingham equivalent, though stakeholders were not involved in its preparation and it appeared very late in the day. It is possibly conservative in its estimates, though doubts were expressed as to whether it allowed for sufficient urban green spaces to be provided in the redevelopment of previously used land.

14.53. Such are the conceptual problems involved in their construction that no urban capacity study, in our view, can be regarded as a wholly reliable guide to future performance. Nevertheless, this one appears to be as good as any, and in our view may be taken as a reasonable guide for the strategic planning of the area.

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512 Statements by the Home Builders Federation and Government Office
513 Core document HOU55.
514 Oral evidence of Ms Russell.
515 Oral evidence of Ms Lisa Hopkinson on behalf of the Derbyshire & S Derbyshire Friends of the Earth and CPRE.
516 Oral evidence of Ms Hopkinson.
14.54. But, should better figures appear as a result of monitoring urban capacity, then timely adjustments should be in the local planning of both Derby and the surrounding districts.

**Location of urban extensions**

14.55. In setting out the targets for additional housebuilding in South Derbyshire, in Three Cities SRS Policy 4, the draft strategy requires that 255 dwellings per year should take the form of sustainable urban extensions to the Derby principal urban area and the remainder of the 605 allocated should be focussed on the Swadlincote area.

14.56. Although this locational guide is criticised on the basis that the location of new development should be left to local planning, our own view is that the general policy of consolidation makes it important that the regional spatial strategy clearly indicates that the bulk of the allocation should be directed to the Derby Principal Urban Area in the first instance and to the district’s only sub-regional centre – Swadlincote – afterwards. As an analogy, the expression “focussed” is too vague for use in a policy, and we prefer that it be said in plain words that the remainder should be located mainly at Swadlincote. What is clear to us is that the district’s allocation should not be spread about the district in contravention of the fundamental policy of concentration.

14.57. We therefore recommend that Three Cities SRS Policy 4 in respect of South Derbyshire, the words “focussed primarily” be replaced by “located mainly in”.

14.58. We make a similar recommendation in respect of the Amber Valley in the Three Cities SRS Policy 4.

**Burton, Swadlincote and Coalville**

14.59. We questioned the extent to which these settlements function as a single corridor roughly following the line of Burton-Leicester freight railway line on which the re-introduction of passenger services was agreed in 1992 but has never been progressed. We consider that there is considerable potential for future development in this area but accept that it does not function as a single corridor at present. Indeed, from what we heard Coalville and Ashby look to Leicester whereas Swadlincote is closely associated with Burton upon Trent.

14.60. As indicated above, we do not consider it appropriate for the draft strategy to be so specific as to indicate a figure for a sustainable urban extension at Coalville, although we agree that for there to be sustainable development there would probably have to be in the region of up to 5,000 dwellings to achieve the necessary thresholds for service and infrastructure provision. This also has to be balanced by a programme for the regeneration of the central areas of the town. The issues are properly for consideration at local development framework level.

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517 Written and oral evidence of Mr Ian Bowen on behalf of South Derbyshire District Council.
518 “The National Forest Line”.
519 As informed by Ashby-de-la-Zouch Civic Society.
520 Oral evidence of Mr Steve Bambrick on behalf of North West Leicestershire District Council.
14.61. We heard much about the relationship between Burton upon Trent and Swadlincote and the large brownfield site of the disused Drakelow power station\textsuperscript{521} just across the River Trent in South Derbyshire. We are in full accord with the general opinion, accepted by the Assembly, that more is needed in the draft strategy to facilitate cross-boundary working between East Staffordshire and South Derbyshire districts; indeed the role of Burton as a new growth point and its likely identification as a “sub-regional focus” are matters which are currently under review in the West Midlands strategy.

14.62. We consider that it would be premature to make specific provision in this regional strategy for what would amount to “overspill” development from Burton into the East Midlands. Such a decision can only be taken in the context of the West Midlands strategy but this draft strategy should not be seen as limiting options for joint consideration, including the future of Drakelow power station, as it is also clear to us that any provision for housing would be additional to South Derbyshire’s allocation in the draft strategy.

14.63. It would be inappropriate to progress this issue by way of a joint action plan, certainly without up-to-date core strategies in place which fully reflect the appropriate regional strategy. However, we agree that a joint cross-boundary study should be undertaken as soon as the strategic context in the West Midlands is fully resolved and that should cover transport issues such as the A38/A511 “regeneration corridor”\textsuperscript{522} as well as the National Forest rail line. The need for analysing land use proposals and transport priorities together was emphasised in our Chapter 12.

14.64. We recommend [R14.16] that the last sentence in paragraph 5.8 be replaced by the following text\textsuperscript{523}:

“In South Derbyshire consideration should be given to the functional relationship between Burton upon Trent and Swadlincote. This may involve the preparation of a joint study by the respective regional partners to investigate the development potential identified on each side of the regional boundary, including transport improvements such as the A38/A511 corridor and the National Forest rail line. Co-operative working on core strategies in South Derbyshire and East Staffordshire would be appropriate in view of the role being considered for Burton upon Trent through the West Midlands RSS revision and the status of the town as a “new growth point”. As a result of this co-operative working additional provision may be made in South Derbyshire above the levels set out in Policy 14 and Three Cities SRS Policy 4 where this would result in the most sustainable form of development to meet the needs of East Staffordshire as identified in the West Midlands RSS.”

\textsuperscript{521} Courtesy of Professor David Lock.
\textsuperscript{522} As referenced by emda.
\textsuperscript{523} Largely derived from that put forward by the West Midlands Regional Assembly.
### Chapter 14 Recommendations

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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<tbody>
<tr>
<td>R14.1</td>
<td>14.2.</td>
<td>No change in respect of the New Growth Point.</td>
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<td>R14.2</td>
<td>14.13.</td>
<td>That the review required by Three Cities SRS Policy 2 be widened so that it is not solely related to the Nottingham principal urban area and that in undertaking that review the Green Belt should be recast so as to provide a separation between Nottingham and Derby without surrounding the city of Nottingham.</td>
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<tr>
<td>R14.3</td>
<td>14.15.</td>
<td>That reference to the extension of Green Belt in South Derbyshire and North West Leicestershire be excised.</td>
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<td>R14.4</td>
<td>14.18.</td>
<td>That all reference to the location of a sustainable urban extension at Clifton be removed from the regional strategy’s policy and from the preceding spatial analysis.</td>
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<tr>
<td>R14.5</td>
<td>14.19.</td>
<td>That the draft strategy be amended so as to state clearly that a full sub-regional study be undertaken jointly by the six local planning authorities in the Nottingham Housing Market Area.</td>
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<tr>
<td>R14.6</td>
<td>14.29.</td>
<td>That the draft strategy be amended by the distribution to districts of the housing figures for the Nottingham Principal Urban Area part housing market area contained in the table following paragraph 14.29.</td>
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<tr>
<td>R14.7</td>
<td>14.30.</td>
<td>That the Nottingham part of Three Cities SRS Policy 4 should include a proviso that, in the event of the joint preparation of a core strategy producing a revised distribution of the housing market figure based on better evidence of the urban capacity of Nottingham and a revised locational pattern of urban extension, such revised figures should be used instead of the figures in the said policy.</td>
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<td>R14.8</td>
<td>14.36.</td>
<td>The deletion of the detailed locations included in brackets in paragraph 5.10.</td>
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<tr>
<td>R14.9</td>
<td>14.40.</td>
<td>The need to adjust the figures for the Leicestershire housing market area in order to reflect the 2004 population projections but other than that we do not agree to the revised distribution put forward by the County Council and we recommend no change in this respect.</td>
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<td>R14.12</td>
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Chapter 15: The Northern Sub-Regional Strategy

Definition; regeneration; housing – quality and numbers; green wedges/strategic gaps; urban extensions; retail hierarchy; tourism; Growth Points – Newark and Mansfield.

Definition

15.1. The Northern Sub-Region, as defined in the draft strategy, is contiguous with the Northern Sub-Area, and covers the Nottingham Outer housing market area (Ashfield except for Hucknall, Mansfield, Newark & Sherwood) together with parts of the Sheffield/Rotherham housing market area (Bolsover, Chesterfield, North East Derbyshire other than the Peak District and Bassetlaw).

15.2. We heard no complaints about this definition, which appears to us to be logically founded.

Regeneration

15.3. In terms of multiple deprivation this sub-region contains some of the worst affected areas in the region, indeed some of the worst in England and Wales. Regeneration, in all its aspects, is therefore, in our opinion, a matter of the highest priority. It must never be forgotten that the aim of planning is to make things better for the people of an area. At the examination, we heard much about the work that has been done, and is being done, to regenerate the economy of the former coalfield. It is heartening to learn that more people are working in the area now than when coal mining was the major industry. To a lesser extent, we heard also of the continuing necessity to improve the existing housing stock and the urban environment generally. All this is in the draft strategy. But we also heard of the necessity to improve the social infrastructure of the Northern Sub-Region, in particular its schools and its health services. The area has low standards of public health, together with too much alcohol and drug dependency. Plainly, a “more rounded approach” is needed to regeneration. Policy 8 of the draft strategy makes reference in its introduction to social considerations, as does Policy 19, yet neither follows up the references in their detail. And in Part 2 of the draft strategy, apart from a passing reference in paragraph 6.9, the social issues in the sub-region are not mentioned. They should be.

15.4. Although we would have liked to have obtained a response for the providers of social services – primary care trusts, hospital trusts, education and social service authorities and the like, our procedures and the time available did not permit, and so we are unable to make specific recommendations in this area. Nevertheless, we consider it important both that the Assembly engage in dialogue with providers as to the

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525 Oral evidence of Mr Geoff Brown on behalf of emda.
526 Oral evidence of Ms Helen Metcalfe on behalf of East Midlands Planning Aid and of Mrs Valerie Gillespie on behalf of the CPRE.
527 Oral evidence of Mr Andrew Pritchard on behalf of the Assembly.
528 Oral evidence of Mr Pritchard.
importance to the draft strategy of improvement of social infrastructure (if they are not already in such dialogue) and also that local planners engage in such dialogue early in the preparation of local development frameworks529.

15.5. Another problem in the area is lack of aspiration. This can be exacerbated where new people come into a former mining community, only to take the opportunities on offer and thereby reinforcing the lack of hope among the existing population530. As we see it, this is a problem that can be tackled only by concerted programmes involving a number of local agencies531.

15.6. We note also evidence about the special problem of rural deprivation in the more isolated former mining villages from which people would like to move out, but cannot afford to do so532.

15.7. We therefore recommend [R15.1] that text be added to Part 2 of the draft strategy, commenting upon the social needs of the sub-region and that Policy 8 be modified by the addition of a reference to the improvement of the social infrastructure of the sub-area.

Housing – quality and numbers

Quality

15.8. As we have already observed, a key feature in the planning of this sub-region is regeneration, which in all its aspects is a matter of the highest priority. Not least among the regeneration priorities is the regeneration of the housing stock. Good quality housing is needed to attract people to the area, not just for themselves but also as an indicator of the ambience of the locality. Local people deserve better housing too. However, there is limited stock of good quality in the former mining areas and too much that is unattractive533. While Pathfinder schemes such as that at Stoke on Trent appear to be backing away from wholesale demolition534, funded public sector involvement may nevertheless be often necessary to give regeneration a “kick-start”535. Success in regeneration is dependent upon partnership and joint working536.

Numbers

15.9. While some thought that overall the figures of additional housing provision for all authorities in the region were too high and others thought them too low537, discussion at the examination focussed mainly on districts in the Sheffield/Rotherham housing market area. Here, a good case, in
our opinion, was made out\textsuperscript{538} for restricting numbers in the interests of limiting counter-urbanisation of the conurbation. We see this as a greater priority than the sub-region assisting more in making provision for the conurbation\textsuperscript{539}, which, in our opinion would exacerbate counter-urbanisation. In particular discussion centred on the districts of North East Derbyshire and Bassetlaw, both of which adjoin the regional boundary\textsuperscript{540}.

15.10. The draft strategy proposes in North East Derbyshire an annual allocation of 330, a little higher than trend and substantially higher than the current building rate. If it were just a matter of limiting counter-urbanisation in the nearby conurbation, that would be all. Yet North East Derbyshire does not only adjoin the regional boundary, it also wraps around Chesterfield and extends well to the south of that town where there are major areas of despoiled land\textsuperscript{541}. While the location of development within a district is a matter for the local planning process, we agree\textsuperscript{542} that allocations could be in support of the development of Chesterfield, and need not be located so as to detract from the policy of limiting counter-urbanisation in the South Yorkshire conurbation. So we recommend [R15.2] no modification to the numbers for North East Derbyshire in the draft strategy.

15.11. In Bassetlaw the trend figure is high, largely in anticipation of increased inward migration from the conurbation, and the allocation in the draft strategy (330) is roughly at the current annual building rate. Despite the designation of Worksop as a sub-regional centre, the district is one of rural areas and small towns only, and there is little re-usable land. New house building at Worksop appears to have been aimed at the commuter market, rather than at local needs\textsuperscript{543}. Moreover there is a substantial discrepancy between the population of working age (51,000) and that of jobs (45,000), suggesting that there is already substantial out-commuting in the district.

15.12. So, although the draft strategy makes a substantial reduction from trend, we consider it is not enough, and we share the view\textsuperscript{544} that a further annual reduction of 50 would be appropriate. On the basis that this figure should be accommodated within the same housing market area, and that the reduction is being made to reduce the trend to counter-urbanisation in Sheffield and Rotherham, we are of the opinion that adjustment, if needed, should be made in the Yorkshire and Humberside Region.

\textsuperscript{538} By Mr Pritchard in support of the Yorkshire and the Humber Panel Recommendations.
\textsuperscript{539} As urged by Development Land and Planning in writing and in Mr Roland Bolton’s oral evidence.
\textsuperscript{540} The local authorities for both these areas consider that their allocations are too high.
\textsuperscript{541} Oral evidence of Miss Helen Fairfax on behalf of North East Derbyshire District Council.
\textsuperscript{542} With Miss Carol Muston of RPS on behalf of various clients.
\textsuperscript{543} Oral evidence of Mrs Gillespie.
\textsuperscript{544} Oral evidence of Mr Telford.
15.13. **We recommend** [R15.3] that Policy 14 regarding Bassetlaw be modified to substitute a rate of 280 additional units annually for the 330 proposed in the draft strategy\(^{545}\).

**Green wedges/strategic gaps**

15.14. Although there are no green wedges or strategic gaps formally identified in the draft strategy for the Northern Sub-Region, there is such a policy for the Three Cities Sub-Region, and suggestions were made\(^{546}\) that something similar could be provided in the Northern. The separation of the Ashfield towns from Mansfield and Bolsover was given as an example\(^{547}\).

15.15. While we recognise that green wedges, strategic gaps and other manifestations of green infrastructure have an important part to play in preserving and enhancing the pleasantness of the sub-region, we see this entirely as a matter for local planning.

**Urban extensions**

15.16. Although it was argued\(^{548}\) that the location of urban extensions proposed in general terms in Northern SRS Policy 1 should be shown on the spatial diagram, our general view, as expressed in Chapter 1, is that they should not be so shown. This is a matter for local planning.

**Retail hierarchy**

15.17. Complaint was made\(^{549}\) that the town centre of Sutton in Ashfield was not ranked as a sub-regional centre in Northern SRS Policy 3 ("Supporting the Roles of Town and Village Centres"). In its favour is evidence that more than 53% of the local population shop there\(^{550}\). GVA Grimley have identified it as a sub-regional centre, and the Goad Survey shows it above Mansfield\(^{551}\), which is not disputed as a sub-regional centre. It is also a place where local people go to socialise\(^{552}\) and we were impressed on our visit there of the steps taken to improve its urban ambience. We therefore agree that Sutton in Ashfield town centre should be ranked as a sub-regional centre.

15.18. We share doubts\(^{553}\), however, as to whether the question of retail hierarchy is of such strategic importance as to justify a free-standing policy, and agree\(^{554}\) that it could more usefully be drawn into the second part of Northern SRS Policy 1.

15.19. Moreover, as we find\(^{555}\) a clear identification only between sub-regional centres and the remainder, the two categories – "main retail and  

\(^{545}\) This figure will need to be adjusted to take account of the 2004 household projections. See note(c) to the table in paragraph 4.6.  
\(^{546}\) By Ashfield District Council, with the support of Mr Pritchard in oral evidence.  
\(^{547}\) Oral evidence of Mr Allan Whitelaw on behalf of Ashfield District Council.  
\(^{548}\) By Ms Muston of RPS among others.  
\(^{549}\) By Ashfield District Council.  
\(^{550}\) Oral evidence of Mr Whitelaw.  
\(^{551}\) Oral evidence of Mr Pritchard.  
\(^{552}\) Oral evidence of Mrs Gillespie.  
\(^{553}\) Of Mr Pritchard in oral evidence.  
\(^{554}\) With Mr Cooper in oral evidence.  
\(^{555}\) See Chapter 5.
service centres” and “other retail and service centres” should be amalgamated. The distinction, in our opinion, serves no useful purpose.

15.20. We therefore recommend [R15.4] that Northern SRS Policy 3 be deleted, that its material be added to Northern SRS Policy 1 with the addition of Sutton in Ashfield as a sub-regional centre and the amalgamation of “main” and other retail and service centres.

Tourism

15.21. Given that the expansion of tourism is part of the strategy for economic regeneration in the sub-region and also that its great potential for tourism should be protected and not over-exploited, we considered whether an express policy on tourism should be included among the policies for the sub-region. However, we note not only that planning practice for the development of tourism is set out in some detail in national guidance, but also that it is set out on a regional basis in Policy 24, the supporting text to which makes express reference to the internationally recognised tourist attraction of Sherwood Forest.

15.22. We recommend [R15.5] no modification of the draft strategy on this issue.

Growth Points – Newark and Mansfield

Newark

15.23. Newark has been nominated as a new growth point, subject to testing in the process of regional spatial strategy. It has a buoyant economy and the status of a sub-regional centre in the draft strategy. It is also well connected by rail and trunk roads. Although there is some concern that the expansion of Newark would detract from the trade of Mansfield and Ashfield to the west and Lincoln to the east, we consider that such effects are to some degree inevitable in a competitive world and agree that they should not stand in the way of a successful growth point bid.

15.24. There are concerns also at the effect of the bid on the local planning of Newark – on local infrastructure, concentration of new housing on a few large sites and the like – but we do not consider that such problems cannot be dealt with satisfactorily in the local planning process.

15.25. We therefore recommend [R15.6] that continued support be given to Newark as a growth point.

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556 Written and oral evidence of Mrs Gillespie on behalf of the CPRE, and of Mr John Dowson on behalf of the Derbyshire and Nottinghamshire Chamber of Commerce.
558 Oral evidence of Mr Cooper.
559 Policy 4.
560 East Coast Main Line (over 20 trains each way daily) and local lines to Grimsby, Lincoln, Nottingham and Leicester (15-16 trains daily). A1 and A46 trunk roads.
561 Oral evidence of Mr John Gillespie on behalf of Upton Parish Council.
562 With Mr Cooper.
563 Oral evidence of Mr Gillespie.
Mansfield

15.26. Mansfield was an unsuccessful contender for new growth point status, largely, we understand, because it was thought that its economic prospects were poor\textsuperscript{564}. However, this is not the current view of emda, which, in continuing to support the bid, considers that past interventions to improve the economic prospects of the area are now bearing fruit, though there is still much to be done. Among the interventions still required is making best use of the £30 million investment in the Mansfield Area Regeneration Route (unhappily called the “MARR”\textsuperscript{565}, but now renamed as “Sherwood Way”). Inevitably this will require taking greenfield land\textsuperscript{566}, but it need not be in the Nottingham/Derby Green Belt and in any event some loss of greenfield land is, in our opinion, justifiable in the interests of turning round the local economy. It should, of course, be at least matched by the “greening” of isolated former colliery and industrial sites the re-use of which would be unsustainable.

15.27. We share the view\textsuperscript{567} also that enhancement is needed of established industrial estates along Sherwood Way in order to make them more attractive to higher value activities. Also essential is the upgrading of the existing housing stock and the urban environment generally. We see this as every bit as important as adding to the housing stock. Not only is a more attractive town more likely to attract and retain investment, but the present inhabitants deserve it too.

15.28. We note that, although the proposed additional housing provision is only 410 annually\textsuperscript{568}, it is some 270\% higher than current annual provision and some 57\% higher than the current trend\textsuperscript{569}. With the current annual building rate being some 336\textsuperscript{570}, we have no problem with the annual rate rising to the extent necessary to provide the proposed average over the plan period, provided that all necessary actions are taken to underpin the buoyancy of the local economy. Without this underpinning, the result would be either that the builders did not build to the extent proposed, or, if they did, there would be an undesirable increase in commuting into Nottingham.

15.29. While much of the evidence required to evaluate a new growth point proposal is outside the scope of our examination, we are satisfied it will substantially assist the local implementation of the draft strategy, and so we recommend [R15.7] that Mansfield’s bid be reconsidered.

\textsuperscript{564} Oral evidence of Mr Will Rossiter on behalf of emda, and of Mr Rob Routledge on behalf of Mansfield District Council.

\textsuperscript{565} “Mar v.t. Impair fatally, ruin, ... spoil, disfigure, impair perfection of ...” Concise Oxford Dictionary, 6th edn. 1977.

\textsuperscript{566} A point which caused concern to the CPRE.

\textsuperscript{567} Of Mr Rossiter.

\textsuperscript{568} Compared with the criterion for new growth points of 500 annually.

\textsuperscript{569} See Table at Appendix 2 of the draft plan, i.e. 2003 based trend.

\textsuperscript{570} 2001-2005.
### Recommendations

<table>
<thead>
<tr>
<th>Recommendation Number</th>
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<tr>
<td>R15.1</td>
<td>15.7</td>
<td>That text be added to Part 2 of the draft strategy, commenting upon the social needs of the sub-region and that Policy 8 be modified by the addition of a reference to the improvement of the social infrastructure of the sub-area.</td>
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<tr>
<td>R15.2</td>
<td>15.10</td>
<td>No modification to the numbers for North East Derbyshire in the draft strategy.</td>
</tr>
<tr>
<td>R15.3</td>
<td>15.13</td>
<td>That Policy 14 regarding Bassetlaw be modified to substitute a rate of 280 additional units annually for the 330 proposed in the draft strategy.</td>
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<tr>
<td>R15.4</td>
<td>15.20</td>
<td>That Northern SRS Policy 3 be deleted, that its material be added to Northern SRS Policy 1 with the addition of Sutton in Ashfield as a sub-regional centre and the amalgamation of “main” and other “retail and service centres.</td>
</tr>
<tr>
<td>R15.5</td>
<td>15.22</td>
<td>No modification of the draft strategy on tourism.</td>
</tr>
<tr>
<td>R15.6</td>
<td>15.25</td>
<td>That continued support be given to Newark as a growth point.</td>
</tr>
<tr>
<td>R15.7</td>
<td>15.29</td>
<td>That Mansfield’s growth point bid be reconsidered.</td>
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Chapter 16: The Lincoln Policy Area Sub-Regional Strategy

Level of detail; employment; housing; green wedges; City Centre policy; transport strategy; the practicality of the new growth point proposal.

Level of Detail

16.1. In our discussion of variations in the level of detail in the draft strategy in Chapter 1 we observe that the Lincoln Policy Area Sub-regional strategy is plainly at odds with our general view on locational specificity, which is that matters such as the location of urban extensions are for planning at the local level and not for the draft strategy. Nevertheless, locational specificity is a feature of the draft strategy in the Lincoln area and it performs a useful role in the interim period between the approval of regional strategy and the adoption of local planning materials. So we take the view that this sort of material should stay in this revision of the strategy. It is, in our view, a model for a jointly prepared local development core strategy and will, we hope, become a core strategy in the fullness of time. In a future roll forward we expect it to be deleted from regional strategy, but not now. Moreover, analysis at this level has proved to be important in testing the practicality of the new growth point proposal.

Employment

16.2. All the evidence before us suggests that the economy of the Lincoln Policy Area is buoyant, partly as a result of university expansion, partly to the promotion of tourism and partly due to diminishing peripherality as transport links have been improved.

16.3. The debate we had about the provision of figures of employment land area in the region as a whole was repeated in connection with the policy area, but we see no good local reason for departing from our general conclusion in Chapter 5 that local planning should be guided by a policy which requires local authorities, emda and sub-regional strategic partnerships to work together in housing market areas to undertake and keep up to date employment land reviews.

16.4. We therefore recommend that Lincoln Policy Area SRS Policy 5 be excised from the draft strategy.

Housing

16.5. The Lincoln Policy Area is but the central part of the Central Lincolnshire housing market area which comprises not only the City of Lincoln but also the whole of the districts of North Kesteven and West Lindsey, in which an additional 45,750 new dwellings are proposed in the

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571 Oral evidence of Mr Craig Tabb of Drivers Jonas on behalf of Lincoln University and Ms Julie Tanner on behalf of emda.
572 Oral evidence of Ms Tanner.
573 For the inclusion of figures — Lincolnshire County Council and Lincoln City, against — West Lindsey DC and emda.
574 Paragraph 5.23, [R5.3].
plan period\textsuperscript{575}. Rather more than half (28,350) are expected to be built in the Lincoln Policy Area, of which 9,500 were included in Lincoln’s successful bid to be a new growth point.

16.6. Concern was expressed both that the numbers proposed would constrain economic growth in the area\textsuperscript{576} and also that their realisation could be achieved only at the cost of negative environmental impacts and the use of greenfield land\textsuperscript{577}.

16.7. Some comments of ours on the transport planning and the proposed urban extensions of Lincoln may be found in the paragraphs below. Water cycle studies are also needed before too much commitment is made\textsuperscript{578}. But we note the buoyancy of the local economy, the growth of Lincoln University, which will add pressure on family housing\textsuperscript{579} and a perception that much of the housing presently on offer is not likely to be attractive to incomers\textsuperscript{580}. It may be that once the sub-regional planning of the area is put on a firmer footing in preparing the core strategies in local planning that it may be found that numbers may be increased.

16.8. In a later paragraph we recommend against the implementation in their entirety of the Western Growth Corridor proposals. This will have implications for the housing allocation figure for Lincoln given in Part 1 Policy 14. So while we have confidence in the given figure for the Central Lincolnshire housing market area, we consider, and so recommend, [R16.2] that a note should be added to the individual district figures to say that the numbers may be redistributed on the joint preparation of a core strategy or strategies for the area.

**Green wedges**

16.9. Green wedges are a feature of the Lincolnshire Structure Plan which continues to command local authority support, although subject to the criticism that in places, particularly to the north of the City, they amounted to a quasi green belt\textsuperscript{581}. We concur, however, that they serve a useful purpose in shaping the city, preserving important views of Lincoln Minster and important landscape features such as the Canwick escarpment. In the fullness of time, we expect detail like this to be found in local development frameworks rather than regional strategy, and it is in the context of local planning that it could be that the system of green wedges is added to as the city expands into the South East Quadrant\textsuperscript{582}.

16.10. We therefore recommend [R16.3] that no change be made to the green wedge proposals in the draft strategy.

\textsuperscript{575} Part 1 Policy 14.
\textsuperscript{576} Pre-examination statements and oral evidence of Ms Joanne Russell on behalf of the Home Builders’ Federation, and emda among others.
\textsuperscript{577} Pre-examination statements and oral evidence of Ms Ann Plackett on behalf of English Heritage and Ms Caroline Adams on behalf of the East Midlands Environment Link.
\textsuperscript{578} Here we agree with the oral evidence of Mr Graham Wilson of the Environment Agency.
\textsuperscript{579} Oral evidence of Mr Craig Tabb of Drivers Jonas on behalf of Lincoln University.
\textsuperscript{580} Oral evidence of Mr Andrew Pritchard on behalf of the Assembly.
\textsuperscript{581} Oral evidence of Ms Russell.
\textsuperscript{582} Following the oral evidence of Mr Ian Carrington of Canwick Parish Council.
City Centre Policy

16.11. Although an addition to Lincoln Policy Area SRS Policy 4 was advocated in order to require local planning to include every sort of community need in the City Centre, the idea commanded little support, and we see no need for it. We agree that the scale of retail development and the provision of community facilities in the City Centre should be left to the local planning process. We therefore recommend [R16.4] that no change be made in this matter.

Transport strategy

16.12. The transport needs of the Lincoln area have been assessed by the Lincoln Transport Study, the recommendations of which include a Lincoln Eastern Bypass amongst other measures to improve public transport. The Study’s recommendations are reflected in Appendix 6 of the draft strategy, in which the Eastern Bypass appears well down the list of sub-regional transport priorities.

16.13. Much of what we heard at the examination placed the need for the Eastern Bypass at the top of the list of transport priorities in the sub-region to support the land-use proposals. We understand why the capacity of infrastructure within the sub-region is potentially the biggest single obstacle to the delivery of the draft strategy. However, in Chapter 12, we have already expressed concern that Appendix 6 does not reflect the general need for measures to encourage significant modal shift. We also observe that, in the case of the Lincoln Sub-Region, the overwhelming support expressed for the bypass is at odds with the regional transport strategy, where the intention is that provision of additional highway capacity will be provided only when all other measures have been exhausted.

16.14. Proponents of the Eastern Bypass accept that there will be some induced traffic onto it but assert that the impact of the bypass on the City, and what can be achieved in terms of modal shift, will be looked at only once the bypass is in place. This is not our view. We consider these issues need to be understood from the outset. In our opinion it is not sufficient to hope that future modelling will demonstrate that the bypass and other elements of the package will be beneficial to the City and to assisting movement toward zero traffic growth.

16.15. Although much weight was given to road building we also heard about other measures such as developing park and ride within the south-east quadrant of Lincoln. This measure proposes to link surrounding villages by bus services to remove a large element of car traffic that would otherwise drive into the park and ride car parks. We have also been told about how Lincolnshire Road Car had been bought by Stagecoach, who then introduced a weekly travel ticket throughout Lincolnshire and that

583 By CB Richard Ellis on behalf of Taylor Woodrow Developments.
584 Lincoln Transport Study Core document RES129.
585 Oral evidence of Mr Ian Stuart of DNS Stuart on behalf of Jesus College.
586 Oral evidence of Mr David George of Lincolnshire County Council.
this has resulted in a 25% increase in passenger numbers in the past 12 months\textsuperscript{587}.

16.16. Moreover, developers have expressed interest in contributing to both highway infrastructure and public transport to enable development\textsuperscript{588}. Districts and Lincolnshire County Council are working together with developers for the (much needed) redevelopment of the City’s bus station\textsuperscript{589}. However, no information has been presented to indicate what order of private sector funding might be possible to help deliver transport projects. Some mechanism needs to be established to get all stakeholders fully involved quickly. We accept that sustainable development supported by sustainable public transport links is high on the agenda of the sub-region, but we wonder whether the challenge of delivery in the first five to ten years has been taken up.

16.17. Many of the comments we have made in relation to the regional transport strategy\textsuperscript{590} apply equally to the sub-regional transport strategy. No evidence has been presented to demonstrate the effect that the proposed transport priorities will have on traffic growth in the sub-region and what the corresponding reduction in traffic will be in Lincoln City. We do not see, against the back-cloth of the regional zero traffic growth target, how it can just be accepted that growth in the rural areas generally, and in the Lincoln sub-region in particular, will inevitably lead to increased traffic growth without this impact being quantified. As we have said elsewhere, we would have expected that sub-regional traffic growth targets would have been set and that the transport priorities and land-use proposals over the first five years of the plan period would have been tested against these targets in the fashion already described for the region as a whole.

16.18. \textbf{We recommend} [R16.5] that the sub-regional transport strategy be revisited in the light of all these comments and those in Chapter 12.

\textbf{The practicality of the new growth point proposal}

16.19. The partner local authorities’ ambitions in Lincoln’s growth point proposal include:

- a 30 year vision for a regenerated city centre;
- the consolidation and expansion of district mixed use centres;
- an additional 9,500 homes at Lincoln by 2016;
- single carriageway access to the North East Quadrant development area;
- regeneration of the City Centre and brownfield sites identified in an urban capacity study;
- promotion of city centre living; and
- upgrading the inadequate infrastructure to support further employment growth in Lincoln.

\textsuperscript{587} Oral evidence of Mr George.
\textsuperscript{588} Oral evidence of Mr Stuart.
\textsuperscript{589} Oral evidence of Mr George.
\textsuperscript{590} In Chapter 12.
16.20. Of the above, considerable controversy appeared at the examination in respect of the number and location of homes that were practical in the proposed timescale, having regard to their location in relation to flooding, transport and infrastructure and also the proposed eastern bypass road.

16.21. Given the flooding problem in Lincoln\textsuperscript{591}, we were not surprised to discover that the Secretary of State’s provisional approval of the Growth Point proposal was subject to the findings of a strategic flood risk assessment\textsuperscript{592}.

**Location of proposed urban extensions**

16.22. The draft strategy, inherited from the recently approved (2005) Lincolnshire Structure Plan, proposes three urban extensions: the North East Quadrant, the Western Growth Corridor and the South East Quadrant. These extensions have been selected on the basis of a study in which locations were given marks according to a number of sustainability criteria\textsuperscript{593}. Lincoln Policy Area SRS Policy 4 proposes development in each urban extension on the scale following:

- 2001 onwards: Western Growth Corridor, about 4500 dwellings;
- 2001 onwards: North East Quadrant, about 1500 dwellings;
- 2016 onwards: South East Quadrant, about 3000 dwellings.

16.23. Controversy particularly surrounds the Western Growth Corridor in which 3,550 dwellings were proposed in the Structure Plan and 2,000 in the City of Lincoln Local Plan. The Corridor is currently the site of a planning application for 4,250 homes, together with infrastructure and employment uses\textsuperscript{594}.

16.24. However, the Environment Agency consider that much of the area is liable to flooding up to a depth of some 1.8m in places and that this will get worse in the long term. The Agency is of the view that some 70\% of the Western Growth Corridor lies in flood zone 3 and some 10\% in flood zone 2\textsuperscript{595}. On the basis of the “sequential approach”\textsuperscript{596} other areas around Lincoln should now be considered first, even though they were not considered in earlier plans\textsuperscript{597}.

16.25. While the Western Growth Corridor in this draft strategy is a broad location rather than a specific site, it is reasonably well defined by the existing topography and we have little doubt that the degree of flood risk stated is broadly accurate. At the recent examination of the Lincolnshire Structure Plan it was said that the upper part of the area could accommodate some 1,700 dwellings or up to 2,000 if higher densities were adopted\textsuperscript{598}.

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\textsuperscript{591} Brought home to us by the presence of sandbags at every entrance to the examination venue.


\textsuperscript{593} The “ASDA” Study, Core Document RES37.

\textsuperscript{594} Oral evidence of Ms Pippa Aitken of Addleshaw Goddard on behalf of Taylor Woodrow.

\textsuperscript{595} As defined in PPS25, Annex D, Table D1.

\textsuperscript{596} PPS25, paragraphs 14 and 15.

\textsuperscript{597} Oral evidence of Mr Wilson.

\textsuperscript{598} Oral evidence of Mr Wilson and Ms Aitken.
16.26. The location struck us as a good one from the point of view of being fairly close (2km to 4km) to the City Centre, within the existing urban envelope as defined by the existing Western Bypass and available for early development. So we were interested to learn of a proposal to mitigate flooding by the provision of a reservoir which would be kept dry by pumping if necessary – the "bath–tub" approach as described by a Civil Engineer in evidence. But although such an approach has been adopted elsewhere there is always a residual risk of failure which we see little reason to incur in this case.

16.27. While we appreciate the engineering ingenuity of such mitigation, we nonetheless consider it less satisfactory than not building in a flood plain at all. If something can go wrong, it will.

16.28. Of the alternatives, extension of the North East Quadrant, which is in West Lindsey District, is considered locally to be constrained by the line of the proposed Eastern Bypass, flooding, environmental designation, connectivity with the City Centre (the historic centre lies in the way) and the risk of interfering with views of the Lincoln Minster. Nevertheless, an early start on the development of this area is expected.

16.29. Notwithstanding constraints of archaeology and landscape, the South East Quadrant as proposed in the draft strategy could, subject to delivery, accommodate as much as 10,000 dwellings, though its development is also said to be dependent on the construction of the Eastern Bypass, the subject, as we have seen, of possible review. Without development of major infrastructure, development of more than some 1,500 dwellings could not begin until, perhaps, 2011.

16.30. While people in the existing communities are keen to preserve the identity of their communities and value the countryside around them, we do not see that alternatives to the floodable area of the Western Growth Corridor could not be found in the South East Quadrant, particularly if the line of the proposed Eastern Bypass were not regarded as a constraint. Undoubtedly major infrastructure would be needed to improve connectivity in this quadrant, but we do not see that a bypass road is necessarily the best way of improving radial connectivity even if it improved inner circulation by the diversion of north-south traffic. Nevertheless, new infrastructure could include road building, particularly if it were needed to provide and improve bus routes.

16.31. We agree therefore that substantial reduction in the number of dwellings to be built on the Western Growth Corridor need not derail the growth point proposal, which we recommend be confirmed [R16.6].

16.32. While we recognise the disappointment that will come for a reversal of the plan making trajectory following the publication of PPS25 in
December 2006, we are firmly of the opinion that the areas of the Western Growth Corridor that are in flood zones 2 and 3 should not be developed. Nevertheless we are not in a position to substitute in Lincoln Policy Area SRS Policy 4 our own dates and figures for the proposed urban extensions, which we see as something for the authorities concerned to work out in the context of local planning. In this context the timing of the development is important, as we note in Chapter 4. So we recommend [R16.7]:

that the second part of Lincoln Policy Area SRS Policy 4 (that relating to the timing and capacity of the proposed urban extensions) should be excised from the draft plan, and,

that to Lincoln Policy Area SRS Policy 3 be added a fourth bullet point – “avoid areas liable to flood”.

16.33. Because all of the South East Quadrant is in North Kesteven and some of the Western Growth Corridor is in the City of Lincoln, this recommendation will result in a change in the distribution of the housing market area figure to the districts in Policy 14 and the Lincoln Policy Area SRS Policy 4 (see also paragraph 16.8 above, [R16.2].

Recommendations

<table>
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<tr>
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Chapter 17: Grantham and the Eastern Sub-Area (outside the Lincoln Policy Area)

A sub-regional strategy for the Eastern Sub-Area? Grantham as a Growth Point; Spalding and Peterborough; Gainsborough; coastal flooding – Boston, Spalding and the East Lindsey Coast.

A sub-regional strategy for the Eastern Sub-Area?

17.1. We have said in Chapter 1 that we see no need for sub-regional coverage of the whole area of the region. In that chapter and in Chapter 16 we also see utility in the separate sub-regional treatment of the Lincoln Policy Area. We share the view\textsuperscript{605} that, while there is a “clearly recognised policy deficit”\textsuperscript{606} in the Lincoln Policy Area, this is not the case with the rest of the Eastern Sub-Area, that is, the rest of Lincolnshire and Rutland, although there are particular issues concerning parts of it.

Grantham as a Growth Point

17.2. There is but a passing reference in paragraph 2.3.11 of the draft strategy to the fact that Grantham has been chosen by the Government as one of a number of new growth points, subject to testing in the regional spatial strategy examination process. The town is identified in the commentary on the Eastern sub-area, paragraph 2.5.4, as having a sub-regional role, along with Boston and Spalding, but saying that it has significant potential for growth. There is also a reference to “significantly” strengthening the town’s sub-regional role on page 24 under the Peterborough Partial Housing Market Area. But that is as far as it goes, there is no figure given for the scale of the growth proposed for the town which is subsumed within the Policy 14 total allocation of 630 houses a year for South Kesteven district.

17.3. There were calls for the draft strategy to specify the level of growth in the town with particular concern that otherwise it would be open to the local development framework process to consider options within the southern part of the district, such as at Bourne, which would cause increased commuting to Peterborough\textsuperscript{607}. It was even suggested that the housing market area be split\textsuperscript{608}.

17.4. From what we heard\textsuperscript{609} we are satisfied not only that Grantham is suitable for the scale of growth proposed (275 dwellings per year over 10 years but with much greater potential beyond) but there is recognition by the District Council of the need for balanced employment growth\textsuperscript{610} and transport improvements to ensure sustainable development. There is no flooding risk and a water cycle study should resolve any problems on wastewater treatment\textsuperscript{611}.

\textsuperscript{605} Oral evidence of Mr Anthony Northcott on behalf of West Lindsey District Council.
\textsuperscript{606} PPS11, paragraph 1.13.
\textsuperscript{607} Concern for Peterborough City Council.
\textsuperscript{608} Statement by Ms Jane Gardner of Smith Stuart Reynolds.
\textsuperscript{609} Oral statement of Mr Mark Harrison on behalf of South Kesteven District Council.
\textsuperscript{610} According to emda the town has equal prospects to Newark.
\textsuperscript{611} Evidence from the Environment Agency.
17.5. We consider that the commitment to the funding of infrastructural improvements signalled by the new growth point initiative is likely to guarantee, far more effectively than mere words in a planning document, that the necessary focus of development will be on Grantham rather than elsewhere in the district. The detail as to precise scale and location of any urban extensions is a matter for the local development framework. Indeed, as a general approach, we do not consider that the regional strategy should set figures for sub-regional centres. For practical reasons the housing market area must include the whole district.

17.6. We therefore recommend [R17.1] that continued support be given to Grantham as a growth point. To this end, to strengthen the strategy, we also recommend [R17.2] that the words “assisted by the town’s recognition as a new growth point” be added at the end of paragraph 2.5.4.

**Spalding and Peterborough**

17.7. Spalding and other parts of South Holland District lie in the Peterborough housing market area. Peterborough is identified as a key centre for development and change in the draft East of England strategy where a policy of urban concentration applies. Within this area, Spalding has a sub-regional role612, although there is some concern that development – much of it already committed – in the rural areas of southern South Kesteven could undermine the policy of concentration613.

17.8. We agree614 that the policy of concentration should not deny growth to other towns in the housing market area, but this should not be of such a scale as to increase commuting to Peterborough. In our view, the local planning of towns and villages should recognise the principle of concentration as much as regards Peterborough as it does the principal urban areas of the East Midlands. This is the clear policy of this region’s Assembly, but it is not all that apparent in the draft strategy itself. In Chapter 15 we have already noted a similar policy deficiency as regards the planning of that part of the Sheffield Rotherham housing market area in the East Midlands.

17.9. So we recommend [R17.3] an addition to Policy 4 of the draft strategy (“Concentrating Development in Urban Areas”) to the effect that its policy of concentration should apply to the partial housing market areas of Peterborough (and Sheffield and Rotherham) as to the region’s five principal urban areas.

**Gainsborough**

17.10. While the approach in most of the smaller towns in inland Lincolnshire outside the Lincoln Policy Area is for the earlier policy of dispersed growth to be reversed615, a special case is made out for Gainsborough616, a small industrial town of some 20,000 population.

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612 Policy 6 and paragraph 2.5.4.
613 Oral evidence of Mr Harj Kumar of Peterborough City Council.
614 With Mr Steve Williams of South Holland District Council.
615 Oral evidence of Mr David George on behalf of Lincolnshire County Council.
616 By Mr Northcott with the support of Mr Steve Harley on behalf of emda.
17.11. Although between 1981 and 2001 Gainsborough experienced population decline, in the last few years the town has seen record levels of growth and investment and has a “masterplan” for expansion based on town centre regeneration, a long standing manufacturing base, an inland port and agricultural-allied manufacturing and the refurbishment of existing dwellings as well as the building of new. Over 20km from Lincoln, the nearest major centre, and nearly 40km from Rotherham, around 57% of people living in Gainsborough work there. Whilst adjacent to the River Trent, most of the town is on higher ground above the flood plain.

17.12. Undoubtedly, Gainsborough has a lot going for it, and we agree that regeneration at Gainsborough does not need to be housing led, nor would it lead to excessive unbalanced commuting. Nevertheless, we share concerns that greater growth in the West Lindsey District, beyond that already provided for in the draft strategy, would be in danger of leading to the diversion of inward migration from other parts of Lincolnshire, particularly from Lincoln. How much of the allocated growth in this district goes to Gainsborough is, of course, a matter for local planning. It may be that careful monitoring of the obviously thriving housing growth at Gainsborough may show these concerns to be overstated. If so, the matter can be re-addressed at a future review.

17.13. So we recommend no change to the housing allocations in Policy 14 for West Lindsey.

Coastal Flooding – Boston, Spalding and the East Lindsey Coast

Problem and practice

17.14. We have already noted that: 38% of land in East Lindsey District; 71% of land in South Holland District; and 96% of land in the Borough of Boston is in the coastal floodplain and in flood zone 3 as set out in PPS25. This is all land in which the “sequential approach” to development is advised. We have already noted and welcomed an agreed statement by the Assembly, the Environment Agency and the Government Office.

17.15. In our view it is inconceivable that coastal defences in the area should ever be deliberately abandoned, whatever the financial implications might be. Not only are several substantial towns at risk, so would be some of the best agricultural land in the country. The worry rather is that there might be “abandonment by stealth”.

617 Oral evidence of Mr Northcott.
618 Oral evidence of Mr Graham Wilson on behalf of the Environment Agency.
619 Expressed by Mr Pritchard and Mr George.
620 Chapters 2 and 8.
622 PPS25, Table D3 and paragraphs 14-15.
623 Core document EXAM44.
624 Oral evidence of Mr Stuart Burkitt on behalf of Boston Borough Council.
17.16. All of the towns in the coastal zone have housing needs and to a greater or lesser extent have regeneration needs. These are particularly acute in the East Lindsey towns of Skegness and Mablethorpe. The coastal zone is also home to some 30,000 holiday caravans. It is very important also that business confidence is not lost. From all these points of view we agree that the strategy should ideally be a coordinated one of maintaining and enhancing coastal protection while permitting urban expansion in accordance with local needs having regard to appropriate risk assessment.

17.17. Solution of the problem could benefit from spatial disaggregation, as follows.

**Spalding and the South Holland towns**

17.18. Spalding is a sub-regional centre in the draft strategy. Coastal flooding here and in the smaller towns and villages to the east is not a matter of danger of sudden inundation, though there could be trouble at Spalding if flooding on the River Welland were to coincide with exceptional high tides. We agree that local planning here should be on the basis of a shoreline management plan and flood risk assessments. The current building rate in the district is some 608 annually and there is existing planned provision nearly 7,350 in total. The draft strategy proposes additional house building at an annual rate of 550, some of which no doubt could be built outside the areas of greatest risk.

**Boston**

17.19. Boston is an historic borough of some 58,000 people and also a sub-regional centre. There is a scheme for a barrage at Boston which would give it protection against a 1 in 200 year event, but funding for it has yet to be found. The current building rate is some 367 annually and there is existing planned provision for 2,681 in total. While the draft strategy proposes additional house building at an annual rate of 290, there is little prospect of most of the houses being built other than in areas of risk.

17.20. As can be seen from our appraisal of the provision for affordable housing in Chapter 4, we do not agree that a substantial volume of market housing is needed to provide a percentage for affordable housing.

**The East Lindsey Coast – Skegness to Mablethorpe**

17.21. Skegness and Mablethorpe are long established holiday resorts which, like cold-water resorts the world over, are looking for a new role. Skegness in particular has some of the worst deprivation in the country which, among other factors, has led it to be recommended as the location of a small casino under the Gambling Act 2005. Economic regeneration is therefore a matter of priority. Between the two towns is a string of

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625 Oral evidence of Mr Burkitt, Mr S Machen of East Lindsey District Council and Mr Steve Williams of South Holland District Council.
626 Oral evidence of Mr Williams (of South Holland District Council).
627 Oral evidence of Mr Wilson.
628 With Boston Borough Council in written and oral evidence.
smaller settlements and caravan sites. Both residents and local businesses are very concerned about their future\textsuperscript{630}.

17.22. Yet this area is most at risk from sudden inundation, with possible loss of life if an unusually high tide with high waves driven by an onshore wind were to overtop the sea defences\textsuperscript{631}.

17.23. The current building rate in the District is some 582 annually and there is existing planned provision for nearly 6,000 in total. While the draft strategy proposes additional house building at an annual rate of 650, many of the houses could be built other than in areas of risk, even if this did mean an exception to the policy of concentration. To our mind, there is clearly here some scope for imaginative planning, though planning will have to await the outcome of the work that will follow the Agreed Statement.

17.24. Meanwhile we do not agree\textsuperscript{632} that the regeneration of the coastal towns is dependent upon substantial numbers of additional houses, nor that past trends ought to be continued. High building rates in the coastal area are fuelled mostly by migration of elderly retirees, but the more urgent need in the area is more job opportunities\textsuperscript{633}.

The way forward?

17.25. The large volume of existing planned commitments in all three local government areas suggests to us that there is no great urgency to allocate more. Meanwhile, there is work to be done in implementing the Agreed Statement. So that the strategy proposed in the Agreed Statement should be used to guide the preparation of local development documents, we make this a recommendation [R17.5]. \textbf{We recommend} also [R17.6] that an additional policy be added to the draft strategy, following Policy 6 to which it would relate, not only to mandate a coastal strategy, but also that it should be a guide to the preparation of local development documents until such time as the regional strategy itself is rolled forward.

17.26. Until such a strategy is complete, the Policy 14 housing targets for all three local government areas should include only existing planned commitments and be based on an appropriate annualisation of them, and we so recommend [R17.7]. A worked example of such a calculation is given in an appendix to this chapter. It should be stressed, however, that we would not expect house building rates to reduce at once to these figures, but rather continue at much the same as the present rates until fresh figures may be derived from the proposed coastal strategy.

Recommendations

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<tr>
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<tr>
<td>R17.1</td>
<td>17.6.</td>
<td>That continued support be given to Grantham as a growth point.</td>
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</table>

\textsuperscript{630} Oral evidence of Mr Machen and Mr Harley.

\textsuperscript{631} Environment Agency (2007).

\textsuperscript{632} With Ms Joanne Russell of the Home Builders’ Federation and others.

\textsuperscript{633} Oral evidence of Mr George.
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<tr>
<td>R17.2</td>
<td>17.6.</td>
<td>That the words “assisted by the town’s recognition as a new growth point” be added at the end of paragraph 2.5.4.</td>
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<tr>
<td>R17.3</td>
<td>17.9.</td>
<td>An addition to Policy 4 of the draft strategy (“Concentrating Development in Urban Areas”) to the effect that its policy of concentration should apply to the partial housing market areas of Peterborough (and Sheffield and Rotherham) as to the region’s five principal urban areas.</td>
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<tr>
<td>R17.4</td>
<td>17.13.</td>
<td>No change to the housing allocations in Policy 14 for West Lindsey.</td>
</tr>
<tr>
<td>R17.5</td>
<td>17.25.</td>
<td>That the strategy proposed by the Assembly, the Environment Agency and the Government Office in the Agreed Statement should be used to guide the preparation of local development documents.</td>
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Appendix

Worked examples of one way of annualising existing planned commitments.

**Boston**
- Planned development: 1,788
- Further capacity: 893
- Total planned development: 2,681
- Annualised over 20 years (2006-26) = 134
  - Rounded up to 135 (Total: 2,700)

There were 1837 completions 2001-6 making the figure for 2001-26 4518 dwellings, or an annual average of 181.

**East Lindsey**
- Planned development: 5,999
- Annualised over 20 years (2006-26) = 300 (Total: 6,000)

There were 2910 completions 2001-6 making the figure for 2001-26 8909 dwellings, or an annual average of 356.

**South Holland**
- Planned development: 5,443
- Further capacity: 1,905
- Total planned development: 7,348
- Annualised over 20 years (2006-26) = 367
  - Rounded up to 370 (Total: 7,400)

There were 3041 completions 2001-6 making the figure for 2001-26 10,089, or an annual average of 404.
Chapter 18: The Peak Sub-Area

Background considerations; the scope of Policies 9 and 10; the provision of housing in the park and sub-area; the treatment of national and regional transport routes across the park.

Background considerations

18.1. The text in paragraphs 2.5.21 – 2.5.24 and Policies 9 - 11 and 42(iii) of the draft strategy is very little changed from that in the approved RSS8 at paragraphs 3.5.19 - 22 and Policies 10 - 12 and 43(iii). The policies have been reworded slightly to recognise the wider spatial function of regional strategy which, compared with the former regional planning guidance, is no longer restricted to the land-use planning system. Modest additions are to add a criterion in Policy 9 referring to natural and cultural heritage and to refer, in Policy 10, to the Derwent Valley Mills World Heritage Site.

18.2. As the Secretary of State approved these policies as recently as 2005 it seems to us that they should be regarded as essentially sound and that there would need to be a clear-cut case for any significant amendment.

The relationship of the sub-area to the rest of the region

18.3. The Peak sub-area is atypical within the region in terms of its limited geographical extent and peculiar administrative arrangements, covering only two districts of Derbyshire but with the Peak District National Park at its core, with the special legislative framework which applies to that Authority and the particular planning issues faced in a national park.

18.4. We also need to take account of the fact that the Peak District National Park, and hence the sub-area, extends beyond the boundaries of Derbyshire and hence beyond the East Midlands into parts of Staffordshire, Cheshire, Greater Manchester and Yorkshire. Unfortunately, the extent of the sub-area is not clearly shown on the key diagram – a matter which should be remedied – see Chapter 1, paragraph 1.25 and our recommendation [R1.3]. In so far as the draft strategy is part of the statutory planning system the relevant policies of this draft strategy form part of the development plans for the adjacent local planning authorities. This unique situation must influence the framing of policy. Unfortunately, as we were informed634, other local authority functions, including education and housing, do not cross regional boundaries. Neither the Regional Economic Strategy nor the Regional Housing Strategy applies beyond the regional boundary which makes the co-ordination of spatial policy more difficult.

Sub-area or Sub-region?

18.5. The demise of the Structure Plan for the national park area gave rise to calls635 for the preparation of a sub-regional strategy for the Peak, in part to deal with the cross-regional issues identified above. There are

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634 By Mr Peter Abbott from the Peak District National Park Authority.
635 From the Friends of the Peak District.
sub-regional strategies in Part 2 of the draft strategy covering a large part of the region with suggestions that the eastern sub-area, or at least the Lincolnshire Coast, might also be subject to such a strategy and, if it were, so might the Peak sub-area 636.

18.6. We consider that to be an unconvincing argument. It is clear from the guidance in PPS11 that sub-regional strategies may be justified only where there is a clear policy deficit in their absence. Under the Act proposals for such strategies need to be made by the s.4(4) authority, in this case the National Park Authority, but no support has been forthcoming. Cross-regional issues have been considered in the formulation of this draft strategy and will be a test of the soundness of local development documents. We consider that there is an insufficient policy deficit such as to justify the preparation of a sub-regional strategy with all of the resource implications that would have.

The scope of Policies 9 and 10

18.7. The discussion at the examination was helpful in clarifying the way that Policies 9 and 10 complement one another. At first glance it may appear that Policy 9 applies primarily within the Park and Policy 10 outside it but that is not the case. As stressed by the Assembly Policy 9 is intended to influence actions and decisions across the whole sub-area with special focus in the first two bullet points on the effect on the national park. It would not be appropriate, therefore, for Policy 9 to apply only to the national park and Policy 10 to the rest of the sub-area outside it 637.

18.8. There was some discussion at the examination about the limitation of the scope of the policies to “development”. As we have indicated elsewhere this term has a particular meaning in the legislation and although we understand the point 638 that this, and other, sub-area policies may be used directly in development control decisions this seems to us to be a narrow view which does not align with the concept of spatial planning. Indeed, we consider this to be a retrograde step when compared to the wording of the approved RSS8 which refers to economic development strategies as well as local development frameworks.

18.9. For example, the second bullet point refers to addressing the social and economic needs of the Park’s communities. This is a reflection of the duty of the National Park Authority under s.62 of the Environment Act 1995 but has the effect of extending such considerations to those authorities in and around the sub-area. As indicated above, the fact that the national park extends beyond the regional boundaries makes it important that social programmes, including housing and education, as well as economic programmes are properly planned and co-ordinated on a sub-area basis although it is not necessary to repeat the statutory requirements 639 in the policy.

636 Suggested by the Government Office.
637 As favoured by the Country Land and Business Association, Council for National Parks and Friends of the Peak District.
638 Made by the Assembly.
639 To have regard to the purposes of the Park as defined in s.61 of the 1995 Act.
18.10. For these reasons we consider important that the *in and around* terminology be retained. We also agree\(^{640}\) that the policy should refer to the *preparation of programmes and policies* not *development*. This applies equally to Policy 10 under which some of the actions listed, such as reducing past levels of in-migration, are more relevant as a context for lower level policy-making. Consequently we consider that the headings should revert to *Spatial Priorities* as in the approved RSS8 and that for Policy 9 should explicitly state *in and around*.

18.11. It was also suggested that the second bullet should refer to the social and economic well-being of the communities in the whole sub-area, not just that of the Park. Although this found favour with the Assembly we consider it to be a step too far which would tend to dilute the message of Policy 9 that decision-makers in the rest of the sub-area *around* the Park should consider this aspect; for example affordable housing may be in Buxton, Glossop or even Ashbourne. The needs of areas outside the Park are covered by Policy 10.

18.12. We have considered\(^{641}\) whether the statement in paragraph 2.5.22 relating to major development in the Park should be included in Policy 9. This is undoubtedly worded as a policy but it does no more than reflect the national policy guidance in paragraph 49 of Circular 12/96.

18.13. Subject to what we say above about the application of Policy 10 we consider that the policy sets the right context for the provision of housing and employment in the sub-area and the protection of the environment. The policy is supported by all of the local authorities concerned. We agree that the strategy should be to resist the pressure which must exist for increased housing provision in the towns of the sub-area particularly to complement the strategies for the north-west and Yorkshire which seek to retain population in their areas. Housing development not supported by local employment growth would encourage unsustainable commuting patterns. We heard nothing convincing to support the contention\(^{642}\) that the policy is unduly restrictive especially as the second bullet point would allow for modest growth where local need is identified. Minor wording changes of the kind sought by Natural England would achieve little in practice.

18.14. With regard to Policy 11 the National Trust make the point that they have an important role to play in managing tourism and visitor pressure in the Park and do not fit into the description of an “other public body”. We note that the Trust is not listed either as a “responsible organisation” for the implementation of Policy 11 in Appendix 1 to Part 1. This oversight is easily remedied.

\(^{640}\) With Mr John Holden representing Pegasus Planning Group during discussion on Matter 12.

\(^{641}\) As urged by the Government Office.

\(^{642}\) By Pegasus Planning Group and the Country Land and Business Association.
18.15. Accordingly we recommend [R18.1] the following wording amendments to Policies 9-11:

- the headings for both policies should refer to Spatial Priorities rather than Development and Policy 9 should state; “in and around the Peak Sub-area”
- in Policies 9 and 10 the first word Development should be replaced by The preparation of policies and programmes;
- in Policy 11, first line, the words relevant public bodies should be replaced by responsible organisations which will then cross-reference to the implementing bodies listed in Appendix 1 which should include the National Trust.

The provision of housing in the park and sub-area

The zero-provision figure for the national park

18.16. The focus of discussion at the examination was on the realism on the inclusion, in Policy 14, of a zero figure for the Park, as part of the total provision of 420 dwellings a year in the Peak, Dales and Park housing market area. This is despite the fact that a figure of 43 dwellings is given in Appendix 2 and the nominal provision of 50 dwellings per annum in Policy 17 of the approved RSS8. The inclusion of such a nominal figure is advocated by the Government Office.

18.17. The actual provision of residential units within the Peak Park in the 2001-6 period has totalled 438 dwellings (87 a year) with the majority having unrestricted occupancy but 58.9% (258 units) have been through conversions, particularly in the conversion of redundant mills – which is not likely to recur.

18.18. We heard about the policies which have operated in the Park since the 1991 Structure Plan and that it is envisaged that the majority will continue to be through the operation of the rural exceptions site policy to provide affordable housing with a continuing trickle of conversions and agricultural dwellings. As the Assembly stressed, they do not consider it appropriate to signal through the inclusion of a figure for the Peak Park in Policy 14 that the area should accommodate any of the regional strategic housing provision as the housing will be for local needs only.

18.19. There clearly is a pressing need in the sub-area for more affordable housing and we agree that this should be the number one priority. This may not be quite the same thing as “local needs” housing secured through occupancy condition but it is clear that the operation of Policy 9 has not been seen to conflict with the Structure Plan policies in the national park. We therefore see no need to amend the wording of the policies to broaden their scope.

18.20. We recognise the PPS3 imperative for the creation of mixed and balanced, sustainable, communities but, taking account of the statutory purposes of the Park, there is not the option available in the rest of the

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643 Revised to 48 in Core document HOU43.
644 Excluding those for holiday purposes.
645 2006 Annual Housing report, Annex B Table 3, Core document HOU60.
646 As suggested by the Home Builders’ Federation and Pegasus Planning Group.
sub-area (the housing market area) to provide a proportion of open-market housing on the few suitable sites in order to cross-subsidise the provision of affordable, including intermediate, housing.

18.21. From discussion during the examination about the implementation of the figures in Policy 14 it transpires that they are not seen as “targets” nor “minima” but more in the nature of guidelines. It is also clear to us that the indicative figure in the approved RSS8 has not in any way constrained or even influenced decisions on housing applications by the National Park Authority. In the circumstances it is difficult to see what benefit there would be in the inclusion of a notional figure of 50 dwellings each year. Indeed, we agree with the Assembly that it could give the wrong message, for example it would represent a 5 year “requirement” for 250 dwellings for the purpose of PPS3 and could weaken the ability of the National Park Authority to resist proposals for open-market housing. In our view, the key to the creation of balanced and sustainable communities in areas such as the national park is in the provision of affordable housing to help young people to remain. A strict policy also minimises any hope value there may be and thus assists in bringing forward rural exception (100%) affordable sites. Consequently, the inclusion of a zero figure in Policy 14 is the most appropriate way forward.

18.22. **We recommend** [R18.2] no change to the zero figure for housing provision in the Peak District in Policy 14 of the draft strategy.

**Housing provision in High Peak and Derbyshire Dales**

18.23. The provision in these two districts is well below the “DCLG trend” but rightly so in our view in recognition of their special position in relation to the national park and their relationship with the adjoining regions of the North West and Yorkshire in particular from which there is continuing pressure for development. Nevertheless, as the Assembly point out the provision in the draft strategy is above that of the approved RSS8 and significantly above that which would be required for “nil net migration”.

18.24. Nevertheless we recognise the affordability problems faced by the two districts. Bearing in mind that the National Park Authority is not a housing authority there is clearly a need for a co-ordinated approach across the whole sub-area. We were informed\(^{647}\) that a housing needs survey suggests that nearly 200 dwellings a year will be required in Derbyshire Dales and 300 in High Peak. These would be modest increases in provision but we accept that they would go some way towards making up the identified backlog of need pending further work on full housing market assessments.

18.25. We recognise that the Peak Park will make some contribution to the provision of affordable housing in the Peak, Dales and Park housing market area although that is not, in our view, a reason to include a specific figure for the National Park in isolation. On balance we consider that it would be appropriate to increase the provision for the Derbyshire Dales and High Peak districts on the basis that the increase will be entirely within the affordable categories, otherwise any increases could undermine the strategy of adjoining regions. In this context, it is important to

\(^{647}\) By Derby Dales District Council and High Peak Borough Council.
recognise that the Policy 15 figure applies to the housing market area as a whole; it is not a site-by-site “target”, which is a matter for local development framework policy. It is a necessary caveat for this additional provision that funding must be forthcoming to ensure the proper management of the affordable stock by registered social landlords or by other means but the number of affordable homes in the housing market area will need to be calculated in line with our recommendations [R4.9] and [R4.10] on Policy 15.

18.26. Subject to this caveat we recommend [R18.3] that the figures for housing provision in Policy 14 be increased for the Derbyshire Dales from 150 to 200 and for High Peak from 270 to 300, with a housing market area total increasing from 420 to 500. This also allows for the adjustment to take account of the revised 2004 projections.

The treatment of national and regional transport routes across the park

The A628 Woodhead route and the Mottram-Tintwistle bypass

18.27. The A628 Mottram-Tintwistle bypass was included in the 1998 Roads White Paper and entered the targeted programme of improvements in 2003. The principle has already been discussed at a number of different fora including the examination in public of the regional spatial strategy for the North West of England (RSS13). Furthermore, a Public Inquiry into the details of the scheme was under way at the time of our own examination. That will provide an opportunity for the detailed impact of the scheme, including the environmental impact on the national park, to be considered and reported upon jointly to the relevant Secretaries of State.

18.28. In the circumstance we consider it inappropriate to include the scheme as “within the programme” committed in the regional transport strategy, Appendix 6. We recommend [R18.4] that this be amended to read “Subject to Inquiry and further consideration”.

The South Pennine Integrated Transport Study (SPITS)

18.29. The last part of Policy 9 is completely unaltered from the words contained in the equivalent Policy 10 of the approved RSS8. That spatial strategy also includes (in Policy 43) the same four objectives for the Peak Sub-area of which P1 states that transport strategies should look to implement key proposals of the South Pennine Integrated Transport Study (SPITS). Thus it can be said that these elements of the regional strategy already represent the approved policy of the Secretary of State.

18.30. Furthermore, it was stressed strongly by the Assembly that the South Pennine Integrated Transport Strategy includes a balanced package of measures which include demand management and public transport improvements which have been endorsed by key stakeholders. The proposals for the A628 have to be seen in this wider context. The reference to key proposals in objective P1 of Policy 42 is to those bits of the package which need to come forward through the local transport plan process. Other elements are very localised.
18.31. On the understanding that South Pennine Integrated Transport Strategy is an integrated package we acknowledge that the A628 scheme has a part to play despite the conflict with national park objectives. There is not necessarily a conflict between the wording in Policies 9 and 42 and we do not propose any change to this. However, we agree with the Government Office and **recommend** [R18.5] that the draft strategy should include a brief statement as to the rationale behind South Pennine Integrated Transport Strategy to put the statement in Policy 9 in its proper context and to cross-reference to Policy 42. We consider this is best done in a new paragraph to follow 2.5.23.

18.32. We also endorse the concerns voiced on behalf of the Assembly that the South Pennine Integrated Transport Strategy proposals were conceived as an integrated package but that only the road element has achieved funding approval. As we identify in Chapter 12, in our broader consideration of the regional transport strategy it is essential that public transport improvements are fully funded if the region is to achieve other objectives for modal shift, reduction in CO₂ emissions and to minimise the adverse effects of climate change.

**Recommendations**

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Inquiry and further consideration”. |
Chapter 19: Monitoring Implementation and Review

The statutory requirement; monitoring arrangements/machinery; policy targets and indicators; the relationship between monitoring and plan preparation; implementing the draft strategy.

The statutory requirement

19.1. The Assembly is required to produce a monitoring report each year to evaluate the implementation of the spatial strategy. Key policies should be written in such a way that they can be supported by targets and indicators. Wherever possible, data from previous monitoring reports should be included to look at trends over time to indicate areas in which progress is being made and areas which may require intervention. It is important to continue to build-up a consistent set of data from which to work in the future, advise other organisations, assist inter-regional discussions on cross border issues, and contribute to the wider work of monitoring the East Midlands Integrated Regional Strategy.

Monitoring arrangements/machinery

19.2. We heard that a lot of work had already taken place with regard to monitoring, but due to differing data collection arrangements around the region, collecting consistent data from the 39 district/city and six county councils has proved challenging for all involved. Collecting data from other agencies was also proving somewhat problematic.

19.3. We note the work the Assembly has carried out to improve data gathering over the last five years and their annual monitoring report for 2005-2006 goes a long way to meeting a general requirement by Government about analysing data. For the first time all local authorities had returned their questionnaires to feed into the report, which is significant progress.

19.4. We agree that continued joint working between the Assembly, the Monitoring and Review Advisory Group and other advisory groups will be needed to ensure the indicator framework is strengthened and, where not already in place, arrangements can be made at the appropriate level to collect the data.

19.5. In the light of what we heard of data collection systems and the use of technical resources to ensure that data duplication is avoided we consider that the data monitoring arrangements are adequate. We recognise that much monitoring work will take place at the local level even though the regional strategy has policies and proposals which are free standing and not necessarily dependent upon local planning for their

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649 Oral evidence of Mr Andrew Pritchard of the Assembly.
650 With Mr Pritchard.
652 The Assembly’s pre-examination statement and oral evidence of Mr Richard Cooper on behalf of Nottinghamshire County Council.
implementation\textsuperscript{653}. Further improvements may need to be carried out though, particularly with regards to the gathering of environmental information perhaps through the medium of an environmental observatory\textsuperscript{654}. We therefore recommend [R19.1] additional supporting text in the draft strategy that will indicate that much of the information, including essential environmental information, will be collected at the local level.

**Policy targets and indicators**

19.6. Government guidance is that targets can “provide yardsticks for assessing the extent to which RSS objectives and policies are being achieved and implemented respectively” \textsuperscript{655} and that regional planning bodies should define “targets for each policy objective and associated policy/policies, quantifiable wherever practical or at least indicating a direction of change in a specified time period” \textsuperscript{656}. Clear targets, indicators and timescales are needed to be attached to policies and included in the implementation framework to ensure the accurate monitoring of policies.

19.7. There were concerns\textsuperscript{657} that some of the policies do not contain targets, and if they had been written with one eye on their future monitoring, a more focused and regionally specific approach might have emerged. Many of the policies in the draft strategy will be implemented at the local level, and therefore local development documents and similar will be the appropriate level to set indicators and targets and ensure the implementation of strategic policies. Nevertheless, we agree that it is difficult in some cases to know how some policies in the draft strategy will be monitored as they have no targets or the targets have not been developed. But equally we have not had the time to get evidence as to whether it is practical to attach any further targets or indicators.

19.8. In the case of targets that are in the form of annual figures, there is the likelihood or the possibility of apparent low delivery at the start of the plan period and then an upturn in later years of the period. We agree\textsuperscript{658} that the draft strategy should be broken into periods/phases for targets such as these (example Policy 14 and Policy 37) and then ensure that development targets/numbers are met in the various periods to make up the target and overall figures set for the whole plan period. It should also be stated in the draft strategy that, at the early plan periods, there may be low delivery that will rise in subsequent periods in order to meet the overall figures. We recommend [R19.2] additional supporting text be included in this regard.

**The relationship between monitoring and plan preparation**

19.9. Monitoring\textsuperscript{659} is essential to compare trends against existing policies and targets to determine their effectiveness and need, if any, for

\textsuperscript{653} Oral evidence of Mr Steve Birkinshaw on behalf of the Government Office.
\textsuperscript{654} Oral evidence and pre-examination statement of Ms Karen Davenport on behalf of Natural England and East Midlands Environmental Link.
\textsuperscript{656} DCLG ‘Regional Spatial Strategy Monitoring: A Good Practice Guide’ (December 2005).
\textsuperscript{657} Raised by the Government Office.
\textsuperscript{658} With the oral evidence of Ms Joanne Russell on behalf of the Home Builders’ Federation.
\textsuperscript{659} DCLG ‘Regional Spatial Strategy Monitoring: A Good Practice Guide’ (December 2005).
policy change\textsuperscript{660}. The current annual monitoring report\textsuperscript{661} was produced concurrently with the draft strategy and therefore a relationship between monitoring and the plan making has been established.

19.10. Through the monitoring and review process, issues have emerged in relation to policies in the draft strategy. The expectation for the implementation of policies is that\textsuperscript{662} the review mechanism of the draft strategy should be built in such a way as to take account of all emerging circumstances. We so recommend [R19.3].

**Implementing the draft strategy**

**Funding**

19.11. The draft strategy is very light as to the availability of resources for implementation, but in our view this information is essential. We consider that it is necessary to include the financial implications of delivering the policies in the draft strategy. This is particularly important with regard to transport infrastructure and working systems, and their funding. We therefore recommend [R19.4] that, wherever possible, the funding element and implications of the delivery of policies should be outlined in the appropriate text and stated in respect of each proposal within the implementation framework.

**Implementation framework (Appendix 1)**

19.12. In our opinion the implementation framework needs to be improved. In many instances it lacks timescales and trajectories for implementation and delivery. PPS11 paragraph 3.2 notes the importance of timescales in the delivery of policies. It is important to provide as much certainty as possible in terms of the delivery of key infrastructure, and to achieve this key delivery agencies need to be identified and “on-board” at the earliest opportunity. We therefore recommend [R19.5] the nomination of key delivery agencies and the inclusion of timescales and trajectories for implementation and delivery in the implementation framework.

19.13. The implementation framework has been included in the draft strategy as Appendix 1 to Part One. This is not the only place for such material as Government guidance advises that\textsuperscript{663}:

“A regional spatial strategy must therefore include or have as a separate document cross-referenced in the regional spatial strategy, an implementation plan which sets out for each policy and priority proposal how, by whom and when it is to be implemented.”

19.14. Many of the participants at the examination considered that the implementation framework should not be part of the draft strategy. Reasons in support of separating it out include:

\textsuperscript{660} The Assembly’s pre-examination statement.
\textsuperscript{661} Oral evidence of Mr Cooper.
\textsuperscript{662} Oral evidence of Mr Birkinshaw.
\textsuperscript{663} DCLG ‘Regional Spatial Strategy Monitoring: A Good Practice Guide’ (December 2005) paragraph 2.4.
that it would enable changes to be made more readily to the implementation mechanisms in response to the evidence of future monitoring reports, and

that it would allow for a continuous refinement of targets and indicators which might otherwise be fixed until the draft strategy is reviewed.

19.15. The opposing point to this was that a separate document would not be subject to a full sustainability appraisal\footnote{East Midlands Environment Link pre-examination statement.} and would not have a statutory status.

19.16. Directive 2001/42/EC requires \textit{"formal strategic environmental assessment of certain plans and programmes which could possibly have significant effects on the environment."} The implementation framework would fall within this process and would therefore also be subject to a full sustainability appraisal.

19.17. The implementation framework should be produced concurrently with the draft strategy and, as national guidance advises, should either be incorporated within the draft strategy or as a separate document\footnote{PPS11, paragraphs 3.2 and 3.6.}. If it is produced as a separate document, it should be cross-referenced in the draft strategy and submitted to the Secretary of State along with the draft strategy. It would then have a status comparable to the draft strategy.

19.18. The issues are finely balanced, but in the light of the evidence we heard we consider that Appendix 1 being removed from the draft strategy would not lessen its status, because of the statutory requirement for monitoring. Making an improved Appendix 1 into a self standing implementation plan that is positioned alongside the draft strategy would have considerable benefits in terms of flexibility and ease of review. We therefore \textbf{recommend} \footnote{Oral evidence of Mr Richard Cooper on behalf of the Regional Assembly.} accordingly.

19.19. Finally we agree that\footnote{Oral evidence of Mr Richard Cooper on behalf of the Regional Assembly.} the implementation process is a partnership exercise and that it is essential for partners, stakeholders and the community to be working together to ensure the delivery of policies in the draft strategy. Monitoring and implementation is a continuous process and resources need to be provided to ensure the delivery of the draft strategy’s vision and objectives. It would then be most unfortunate if, after the draft strategy has been approved, the developments of the implementation process and system would have to stop, due to the lack of resources. We leave this as a comment which we hope will be noted by all concerned with the monitoring of regional strategy in the future.

\textbf{Recommendations}

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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<tbody>
<tr>
<td>R19.1</td>
<td>19.5.</td>
<td>Additional supporting text in the draft strategy that will indicate that much of the</td>
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<td>Report Paragraph Number</td>
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<td>information, including essential environmental information, will be collected at the local level.</td>
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<tr>
<td>R19.2</td>
<td>19.8.</td>
<td>Additional supporting text stating that, at the early plan periods, there may be low delivery that will rise in subsequent periods in order to meet the overall figures.</td>
</tr>
<tr>
<td>R19.3</td>
<td>19.10.</td>
<td>That the review mechanism of the draft strategy should be built in such a way as to take account of all emerging circumstances.</td>
</tr>
<tr>
<td>R19.4</td>
<td>19.11.</td>
<td>That the funding element and implications of the delivery of policies should be outlined in the appropriate text and stated in respect of each proposal within the implementation framework.</td>
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<tr>
<td>R19.5</td>
<td>19.12.</td>
<td>The nomination of key delivery agencies and the inclusion of timescales and trajectories for implementation and delivery in the implementation framework.</td>
</tr>
<tr>
<td>R19.6</td>
<td>19.18.</td>
<td>Remove Appendix 1 from the draft strategy and replace with a self-standing implementation plan that is positioned alongside the draft strategy.</td>
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</tbody>
</table>
Introduction

20.1. At the end of the examination, participants were invited to give their views on two questions:

If the Panel were to conclude that provision should be made for fewer homes in the region, where, broadly speaking, should the deletions from the draft strategy be?

If the Panel were to conclude that provision should be made for more homes in the region, where, broadly speaking, should the additions to the draft strategy be?

20.2. In the light of our conclusions on housing numbers recorded in Chapter 4, there is little point in proceeding further with the first question, although we found its discussion to be both useful and illuminating.

20.3. In Chapter 4, we arrive at two conclusions on housing numbers. The first is that wherever trends are to be followed, then the figures should be updated from the 2003 based projections to those based on 2004 data. This conclusion does not raise any difficult land-use issues. Our second conclusion, however, is that the draft strategy seriously underestimates the volume of housing that needs to be provided in the region. As we can see from Chapter 4, this is because the strategy has two complementary aims: to make provision for housing in accordance with current trends in the region and also to make additional provision in Northamptonshire to meet the needs of the south east of England.

20.4. Undoubtedly the global totals in the whole regional strategy show an increase above trend, but that, as we detail in Chapter 4, is not to take account of the addition required to meet the needs of the south east of England. Or, put another way, while the figures for Northamptonshire, are congruent with the additional provision, those for the rest of the region are deficient. So in our view, more radical proposals are needed.

20.5. Nevertheless, given the scope of the examination and the limitations of the evidence, we feel unable to make serious proposals as to the location of the extra housing required. Our conclusions from the discussions on the last day can but at best offer pointers to set going the necessary procedures for consultation, environmental assessment and the like. We hope that they are found helpful.

Where should more homes be provided

Adaptation to the 2004 based trend projections

20.6. Given our support for the fundamental strategy of urban concentration in the draft strategy (Part 1 Policy 4), we consider that the additional housing numbers required according to the 2004 based trend
should be located primarily in and around\(^{668}\) the five principal urban areas of Derby, Leicester, Lincoln, Northampton and Nottingham. So far as is practical and deliverable, this will most likely involve additions to, or additional, sustainable urban extensions to these cities. Then additional development at a smaller scale should be located in the sub-regional centres currently proposed as “Growth Points”\(^ {669}\) – Grantham and Newark - and also possibly in Loughborough\(^ {670}\) and Mansfield. Nevertheless the scale of development at each of these sub-regional centres is a matter for the local planning process. Suitable proposals for additional development might be candidates for growth point status. After this, other selected sub-regional centres should be considered, beginning, according to the general strategy of concentration, with those in the Three Cities Sub-area – Coalville, Hinckley, Hucknall, Ilkeston, Market Harborough, Melton Mowbray and Swadlincote.

20.7. Locations for smaller additions should also be looked for in Daventry, Chesterfield and Worksop.

20.8. In our view, additions should not be made in the parts of the Rotherham-Sheffield housing market area closest to that urban area, nor in the parts of the Peterborough housing market area in this region. This is to complement the policies of concentration in the adjacent regions. Although the recommended provision in the Northern housing market area is somewhat higher than that in draft Policy 14 this is to recognise the needs of those parts of the area less subject to influence from within the Yorkshire and Humber region. It should not undermine the policy imperative identified in paragraph 15.12 of this report.

20.9. Nor should additions be made to the allocations for Boston and Spalding, despite their being sub-regional centres, because of the unresolved issues about coastal flooding reported in Chapter 8.

20.10. Our quantified recommendations about the distribution of additional housing, including our recommendations for the Northamptonshire housing market areas are to be found in Chapter 13. **Additions beyond the 2004 based trend projections**

20.11. Here again we consider that the additional housing required should be allocated with appropriate infrastructure and other uses in accordance with the fundamental strategy of concentration. In particular we consider that the first area of search should be within the general area of the Three Cities – that is, at the core of the region.

20.12. We have already noted\(^ {671}\) that despite their linking for strategic planning purposes, the three cities do not at present act as a single polycentric city, nor do they seem likely to so act in the next few decades. Nevertheless, there is both economic and environmental advantage in size, and development in the centre of the general area of the three cities would tend toward the creation of a polycentric city if it did nothing more.

\(^{668}\) See Chapter 3, paragraph 3.1, footnote 53, for the definition of “in and around”.

\(^{669}\) See Chapter 3 for an account of this Government initiative in relation to the region.

\(^{670}\) Though not necessarily to the extent proposed by Leicestershire County Council in Core document HOU48 and reviewed in Chapter 14.

\(^{671}\) In Chapter 14.
Given support for the expansion of Coalville\textsuperscript{672} and Swadlincote\textsuperscript{673} and the proposal in the emerging draft of the West Midlands regional spatial strategy for the expansion of Burton upon Trent we suggest the consideration of a major expanded settlement of this Burton-Leicester corridor.

20.13. At present it is clear that Swadlincote looks toward Burton as a centre and Coalville to Leicester, while Ashby-de-la-Zouch is somewhere in the middle. A major expansion of the corridor, possibly based on the resuscitation of the National Forest rail line\textsuperscript{674} and taking advantage of the development of the National Forest would be well located for economic development, encourage necessary regeneration and bring together the present separate towns as a principal urban area in its own right, adding to the overall strength of the three cities.

**Next Steps**

20.14. It is clear to us from what the Green Paper has on offer – eco-towns, more growth points and the like – that much seeking of proposals and consultation will be necessary before firm proposals can be made to add substantially to the region’s housing figures. All this could be accommodated within the framework of our examination only at the expense of much additional work and inexcusable delay to 2004 Act plan preparation at the local level. Fortunately the Green Paper proposes “mini-reviews” to add additional material to approved regional spatial strategies.

20.15. For this reason, in addition to those earlier identified, we are not in our recommendations pursuing the topic of expansion beyond additions required by the adoption of the 2004 based trend projections. Such additions should, in our view, be the subject of either ad-hoc proposals such as the Growth Point initiative, or of a mini-review\textsuperscript{675}.

\textsuperscript{672} By Leicestershire County Council’s officers at the examination.

\textsuperscript{673} By Derbyshire County Council’s officers at the examination.

\textsuperscript{674} Studies by the Leicestershire County Council were carried out on this route in the early 1990s. A business case for the re-instatement of passenger services between Leicester and Burton has not been made, it being likely that that considerable investment in infrastructure would be needed, and, in the circumstances pertaining at the time, subsidy to the operator also. (House of Commons Written Answer, 22 June 2004, col.1341W)

\textsuperscript{675} We think that the term “mini-review” could well turn out to be a grave under-statement, given the need to consider not just housing but all the matters in the strategic planning spectrum.
# SCHEDULE OF RECOMMENDATIONS

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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<tbody>
<tr>
<td><strong>Chapter 1 Introduction</strong></td>
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<tr>
<td>R1.1</td>
<td>1.15.</td>
<td>A continuous numbering series throughout the draft strategy, both of pages and paragraphs.</td>
</tr>
<tr>
<td>R1.2</td>
<td>1.25</td>
<td>To emphasise the importance of motorways, and main railway lines to the strategic planning of the region these features should be added to the Regional Key Diagram, as in the approved RPG8.</td>
</tr>
<tr>
<td>R1.3</td>
<td>1.25</td>
<td>That the boundary of the Peak Sub-area is clarified in the Regional Key Diagram.</td>
</tr>
<tr>
<td>R1.4</td>
<td>1.41</td>
<td>That the draft strategy be approved subject to the modifications recommended throughout.</td>
</tr>
<tr>
<td>R1.5</td>
<td>1.43</td>
<td>Each appendix should be clearly linked to a policy in the main text, and that policy should equally clearly set out the status of the relevant appendix.</td>
</tr>
<tr>
<td><strong>Chapter 2 Overview</strong></td>
<td></td>
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<tr>
<td>R2.1</td>
<td>2.3.</td>
<td>The box expounding the vision was so headed and an addition to the vision on the lines that in the next two decades development should be concentrated to re-fill and regenerate the towns and cities, developing sustainable, polycentric patterns of cities and towns that retain their distinctive identity, while working together as mutually supporting urban systems.</td>
</tr>
<tr>
<td>R2.2</td>
<td>2.4.</td>
<td>The insertion of “building a strong and healthy society” in the first paragraph of the vision box.</td>
</tr>
<tr>
<td>R2.3</td>
<td>2.6.</td>
<td>Appendix 1 to Part 1 should be expanded to spell out exactly in what way each policy gives effect to the objectives.</td>
</tr>
<tr>
<td>R2.4</td>
<td>2.7.</td>
<td>The replacement of the words “the following core objectives should be met” by “all strategies, plans and programmes should meet the following core objectives”.</td>
</tr>
</tbody>
</table>
| R2.5                   | 2.10.                   | A stand-alone core objective under Policy 1 to read "to ensure that the
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<td><strong>existing and future housing stock meets the needs of all communities in the region.”</strong></td>
</tr>
<tr>
<td>R2.6</td>
<td>2.11.</td>
<td>The addition of “especially by car” at the end of the third bullet point under objective e).</td>
</tr>
<tr>
<td>R2.7</td>
<td>2.12.</td>
<td>The addition of a reference to cultural assets to the first bullet point under f).</td>
</tr>
<tr>
<td>R2.8</td>
<td>2.14.</td>
<td>Objective b) needs to stress the desire within communities for a clean, safe and crime-free environment and objective c) should refer not just to health, but to the mental, physical and spiritual well-being of the population. It should be clear that the third bullet covers cultural activity also.</td>
</tr>
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</table>
| R2.9                   | 2.20.                   | A new paragraph before Policy 1 to read:  
  
  **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 mitigation in some way, and 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:**  
  - 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 41-54). |
<p>| R2.10                  | 2.21.                   | The introduction to objective h) should refer to cutting CO₂ emissions over time in line with the trajectories which should look to achieve at least a 60% cut by 2050. |
| R2.11                  | 2.22.                   | The inclusion of policy measures needed to achieve a particular trajectory. |
| R2.12                  | 2.23.                   | That the last bullet under objective h) |</p>
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<td>should read “ensuring that new development, particularly major traffic generating uses, are located so as to reduce the need to travel, especially by private car.”</td>
</tr>
<tr>
<td>R2.13</td>
<td>2.25.</td>
<td>A policy be included to accommodate the enhancement and extension of natural habitats to accommodate species migration allowing the biosphere to adapt to climate change especially through the reduction of the heating impact of urban development, to act as carbon sinks and to absorb flood water.</td>
</tr>
<tr>
<td>R2.14</td>
<td>2.26.</td>
<td>Reference should be included to the Climate Change Programme of Action commissioned by the East Midlands Climate Change Partnership and include commitment to the implementation of proposals arising aimed at mitigation and adaption.</td>
</tr>
</tbody>
</table>
| R2.15                 | 2.32.                   | That the wording in the bullet points in Policy 3 be amended as follows:—  

the third bullet point to read ensuring that new buildings (other than dwellings) are compliant … ’very good’.  
Add a new bullet point to read ensuring that all new housing accords with the standards set in the Code for Sustainable Homes and is capable of being adapted …  
the sixth bullet point to read making the most efficient use of land in line with national guidance; |

### Chapter 3 The Spatial Strategy

| R3.1                 | 3.6.  
3.12.  
3.27.  
3.28. | That Policy 4 be modified by clarification that it applies to all sorts of economic activity as well as development in the statutory sense; the inclusion of a statement in sub-paragraph (a) according priority to concentration on the principal urban areas; that sub-paragraph (d) be replaced by a new sub-paragraph taken from the first five lines of Policy 5; and the insertion of a new sub-paragraph (e) stating in respect of the location of all forms of development a strong preference for previously developed land. |
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<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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<tbody>
<tr>
<td>R3.2</td>
<td>3.12. 3.28.</td>
<td>That Policies 2 and 5 be deleted from the draft strategy.</td>
</tr>
<tr>
<td>R3.3</td>
<td>3.6. 3.27. 3.28.</td>
<td>A more full explanation of the strategy and a cross reference to Planning Policy Statement 7 (PPS7) should be given in the supporting text to Policy 4 in Chapter 2.</td>
</tr>
<tr>
<td>R3.4</td>
<td>3.17. 3.28.</td>
<td>A fuller explanation of the four New Growth Point proposals and their relationship to the fundamental strategy of concentration should be given in Chapter 2 of the draft strategy.</td>
</tr>
<tr>
<td>R3.5</td>
<td>3.19. 3.24 3.28.</td>
<td>References be made also in the supporting text of Chapter 2 to regeneration in its fullest, holistic sense being part of the fundamental strategy of the draft strategy; and to the role of the Three Cities together working as the “Core City” of the region.</td>
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**Chapter 4 Housing**

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<tr>
<th>Recommendation Number</th>
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<tbody>
<tr>
<td>R4.1</td>
<td>4.6.</td>
<td>That the relevant local planning authorities within each housing market area should agree with the Assembly the distribution of housing provision between their authorities to total the 2004 adjusted figures as shown in the table below paragraph 4.6. When agreed the revised figures should be shown in Policy 14 and relevant sub-area policies. This table takes account of the additional policy interventions which we recommend in this report, as explained in the table footnotes a-f.</td>
</tr>
<tr>
<td>R4.2</td>
<td>4.26.</td>
<td>That Policy 14 and the equivalent policies in the sub-regional chapters of part 2 should be replaced by a table in the format of that used in the Milton Keynes South Midlands sub-regional strategy.</td>
</tr>
<tr>
<td>R4.3</td>
<td>4.27.</td>
<td>That Table 1 in Appendix 2 be moved forward in the text of the draft strategy to immediately precede the Policy 14 in its amended form. This should show actual completions 2001-6 and the “residual” required to meet revised figures for 2026 with totals given as well as annual averages. We do not suggest any resetting of the figures at a 2006 base because any under-provision since 2001...</td>
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<tr>
<td>R4.4</td>
<td>4.29.</td>
<td>The inclusion of a regional trajectory as a replacement for the summary tables in Appendix 2 which should be made available separately as part of the evidence base.</td>
</tr>
<tr>
<td>R4.5</td>
<td>4.36.</td>
<td>That the wording in Policy 18 should be strengthened to say that joint development plan documents in the named areas will be expected.</td>
</tr>
<tr>
<td>R4.6</td>
<td>4.43.</td>
<td>That the total figure for the sustainable urban extension, when complete, should be given, rather than simply expressed as an annual average provision within each district figure.</td>
</tr>
<tr>
<td>R4.7</td>
<td>4.47.</td>
<td>The deletion from Policy 14 of the final paragraph commencing “Housing provision will be monitored annually ….” and the bullet points which follow and their inclusion as supporting text.</td>
</tr>
<tr>
<td>R4.8</td>
<td>4.64.</td>
<td>That the percentages be replaced by numbers which should be recalculated in the light of our recommendations on the Policy 14 figures.</td>
</tr>
<tr>
<td>R4.9</td>
<td>4.65.</td>
<td>The inclusion of a single figure for each housing market area as an overall, and interim, target for monitoring purposes.</td>
</tr>
<tr>
<td>R4.10</td>
<td>4.68.</td>
<td>The insertion of a new policy on Affordable Rural Housing to follow Policy 15 based on (and replacing all but the first two sentences of) paragraph 3.1.11. It should commence with the words: “Local authorities and housing providers should use all available mechanisms to secure affordable housing in rural areas by:” and continue with the bullet points in paragraph 3.1.11 except that in the seventh bullet point the words “rather than” be replaced by “as well as”.</td>
</tr>
<tr>
<td>R4.11</td>
<td>4.78.</td>
<td>That the accommodation assessment figures for the Leicestershire and Rutland authorities should be substituted for the corresponding interim figures in Appendix 3 of the draft plan, but that in other respects plan Policy 16 and the rest of Appendix 3 be confirmed.</td>
</tr>
<tr>
<td>R4.12</td>
<td>4.83.</td>
<td>That the first bullet point be subsumed</td>
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<tr>
<td>R4.13</td>
<td>4.85</td>
<td>The deletion of paragraph 3.1.20 and the replacement of the first sentence in paragraph 3.1.19 by the following: “PPS3 indicates that a density of 30 dwellings per hectare (net) should be used as a national indicative minimum to guide policy development and decision making until local density policies are in place.”</td>
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<td>into Policy 4 and the remainder of Policy 17 be deleted.</td>
</tr>
<tr>
<td>R4.14</td>
<td>4.86</td>
<td>That the correct format would be “Derby HMA and the West Midlands” and that such an addition be made to Policy 18.</td>
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</table>

**Chapter 5 Economic Strategy**

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<thead>
<tr>
<th>Recommendation Number</th>
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<tbody>
<tr>
<td>R5.1</td>
<td>5.7</td>
<td>A new policy to be inserted before Policy 19 on the lines of: Local authorities in all parts of the region should work together with emda and others with relevant responsibilities to encourage and foster the redevelopment of the regional economy by way of raising skill levels so that the region is better placed to enhance economic performance.</td>
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<tr>
<td>R5.2</td>
<td>5.17</td>
<td>Additions to Policy 19: making it clear that concerted action is needed across the whole spectrum of local governance and that local development documents should translate this message into the action required locally; making it clear that regeneration of all the priority areas must conform with the strategy of concentration set out in Policy 4.</td>
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<tr>
<td>R5.3</td>
<td>5.23</td>
<td>The replacement of Policy 20 by the following: 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.</td>
</tr>
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<td>Recommendation Number</td>
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<td></td>
<td><strong>These allocations will:</strong></td>
</tr>
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<td>- be responsive to market needs and the requirements of potential investors, including the needs of small businesses;</td>
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<td></td>
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<td>- 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;</td>
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<td></td>
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<td>- serve to improve the regeneration of urban areas;</td>
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<td>- ensure that the needs of high technology and knowledge based industries are provided for;</td>
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<td>- promote diversification of the rural economy;</td>
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<td></td>
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<td>- assist the development of sites in the Priority Areas for Regeneration;</td>
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<td>- be of a scale consistent with the essential policy of concentration as set out in Policy 4.</td>
</tr>
<tr>
<td>R5.4</td>
<td>5.28.</td>
<td>The addition of a new Policy to follow Policy 20 of the draft strategy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Policy 20a</strong></td>
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<td></td>
<td><strong>Strategic distribution</strong></td>
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<td></td>
<td></td>
<td>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:</td>
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<tr>
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<td>- West Northamptonshire housing market area</td>
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<td></td>
<td></td>
<td>- Derby housing market area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Nottingham Core housing market area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- North Northamptonshire housing market area</td>
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<tr>
<td></td>
<td></td>
<td>- Leicester and Leicestershire housing market area</td>
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<td><strong>In allocating sites in local development documents local authorities should give</strong></td>
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<td>priority to sites which can be served by railfreight, and operate as inter-modal terminals. Consideration should be given to the following criteria: at least 50 hectares of developable land; good rail access with a generous loading 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, intermodal 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 good access to labour.</td>
</tr>
<tr>
<td>R5.5</td>
<td>5.36.</td>
<td>That Policy 21 should be modified by the inclusion of all appropriate town centre uses in its first bullet point, and that the introduction to the extended paragraph 3.2.14 be replaced by text to the effect that: <em>In the absence of a clear hierarchy, the distribution of additional retail floorspace to town centres in the region should be in line with Policy 4. The focus for major growth is to be on maintaining the roles of the existing principal urban areas which function as the main retail and service centres and are already well served by transport and other infrastructure. There are also opportunities for some sub-regional centres and rural market towns to consolidate and develop their roles in their sub-areas. Below this level, some local centres and rural towns will also need through positive action to ensure they continue to serve</em></td>
</tr>
<tr>
<td>Recommendation Number</td>
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<tr>
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<td></td>
<td>the needs of local communities. The following sections identify the priority centres for additional retail development...</td>
</tr>
<tr>
<td>R5.6</td>
<td>5.41.</td>
<td>That a note be attached to the end of Policy 23 making it clear that local development documents should develop the policy according to local circumstances, and also that an addition to the supporting text be made to the end that it should be clear that the policy refers to all aspects of the diversification of rural economies and not only to farm diversification.</td>
</tr>
</tbody>
</table>

**Chapter 6 Tourism**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
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</thead>
<tbody>
<tr>
<td>R6.1</td>
<td>6.4.</td>
<td>Clarification of the term tourism in the supporting text to 3.2.19.</td>
</tr>
<tr>
<td>R6.2</td>
<td>6.6.</td>
<td>That no modification be made to Policy 24 itself, but that the supporting text at paragraph 3.2.20 be expanded to refer also to the Lincolnshire Coast towns, to the Dukeries, to Rockingham Forest, the Nene Valley Regional Park and the Northamptonshire historic towns and villages, and, in the Three Cities Sub-area, to the historic houses and parklands such as Kettleston, Melbourn and Cork.</td>
</tr>
<tr>
<td>R6.3</td>
<td>6.9.</td>
<td>An addition to the text supporting Policy 24 to the effect that the development of tourism is not only desirable from the economic benefits obtained, but is also important in improving the quality of life in the region.</td>
</tr>
<tr>
<td>R6.4</td>
<td>6.9.</td>
<td>To locate Policy 24 and the related Policy 23 (Casinos) and their supporting material next to the policies for culture, leisure and sport (Policy 40).</td>
</tr>
</tbody>
</table>

**Chapter 7 Natural and Cultural Heritage**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
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</thead>
<tbody>
<tr>
<td>R7.1</td>
<td>7.1.</td>
<td>That the policies are put to no detriment by their current form and that there be no change in this regard.</td>
</tr>
<tr>
<td>R7.2</td>
<td>7.2.</td>
<td>The addition of “within Local Development Frameworks” to the fourth bullet point, Policy 27.</td>
</tr>
<tr>
<td>R7.3</td>
<td>7.4.</td>
<td>Insertion of “waterways” after “river corridors” in paragraph 3.3.8.</td>
</tr>
<tr>
<td>R7.4</td>
<td>7.5.</td>
<td>That a map such as Map 31A from ENV13 should be considered for incorporation</td>
</tr>
<tr>
<td>Recommendation Number</td>
<td>Report Paragraph Number</td>
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</tr>
<tr>
<td>R7.5</td>
<td>7.7.</td>
<td>The insertion of ‘Climate change seems likely to increase pressure on such habitats’ as a penultimate sentence in paragraph 3.3.12.</td>
</tr>
<tr>
<td>R7.6</td>
<td>7.12.</td>
<td>The inclusion of ‘including recognition of the value of tranquillity and dark skies’ to the end of the third bullet point in Policy 30.</td>
</tr>
<tr>
<td>R7.7</td>
<td>7.13.</td>
<td>Merging Diagrams 3 and 5 for the sake of reflecting Policy 26 more accurately and holistically.</td>
</tr>
<tr>
<td>R7.8</td>
<td>7.15.</td>
<td>That Policy 29 adequately protects ancient woodland and that there be no change to the draft strategy.</td>
</tr>
<tr>
<td>R7.9</td>
<td>7.16.</td>
<td>That the final paragraph of Policy 30 be deleted</td>
</tr>
<tr>
<td>R7.10</td>
<td>7.17.</td>
<td>Amendment of the second bullet point to “neither direct nor indirect damage to EU designated Natura sites will be permitted”.</td>
</tr>
<tr>
<td>R7.11</td>
<td>7.18.</td>
<td>Providing an explanation as to what is meant by the first bullet point of Policy 26 “the Region’s internationally and nationally designated natural and historic assets” in the supporting text.</td>
</tr>
<tr>
<td>R7.12</td>
<td>7.20.</td>
<td>That Policy 26 remains in the draft strategy.</td>
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</tbody>
</table>

**Chapter 8 Water Management**

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<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
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</thead>
<tbody>
<tr>
<td>R8.1</td>
<td>8.4.</td>
<td>That no targets should be added to the draft strategy in respect of reducing water supply leakage.</td>
</tr>
<tr>
<td>R8.2</td>
<td>8.7.</td>
<td>That the relevant part of Policy 32 be strengthened to read: “promote improvements in water efficiency in new development and in regeneration to achieve a regional target of a minimum of 25%”.</td>
</tr>
<tr>
<td>R8.3</td>
<td>8.15.</td>
<td>No further modifications to Policy 32.</td>
</tr>
<tr>
<td>R8.4</td>
<td>8.18.</td>
<td>That a clause in Policy 35: “Development should not be permitted if ... it would ... create ... an unacceptable risk (of flooding) elsewhere:” should be supported by a suitable explanation in the supporting text.</td>
</tr>
</tbody>
</table>

**Chapter 9 Minerals**

<table>
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<tr>
<th>Recommendation Number</th>
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</thead>
<tbody>
<tr>
<td>R9.1</td>
<td>9.9.</td>
<td>No modification be made to Policy 36 in respect of aggregate production.</td>
</tr>
<tr>
<td>Recommendation Number</td>
<td>Report Paragraph Number</td>
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</tr>
<tr>
<td>R9.2</td>
<td>9.14.</td>
<td>That a brief (but explicit) reference to the regional situation regarding building stone and slate, brick clay and limestone for cement production, should be included in the supporting text, in order to underpin the all-embracing Policy 36.</td>
</tr>
<tr>
<td>R9.3</td>
<td>9.16.</td>
<td>That the way forward is the excision of the words “non-energy minerals” from Policy 36 and that the word “energy” is thereby included.</td>
</tr>
<tr>
<td><strong>Chapter 10 Waste Management</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R10.1</td>
<td>10.6.</td>
<td>An addition to Policy 37, to be placed before the paragraph beginning “In rural areas...” on the lines of: &quot;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. 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. In the Southern Sub-area, there should be a centralised pattern based around the expanding urban centres. In the Three Cities Sub-area a centralised pattern of large facilities should be developed.&quot;</td>
</tr>
<tr>
<td>R10.2</td>
<td>10.7.</td>
<td>The further modification of Policy 37 by the omission of the text “taking into account the following criteria” and the four bullet points following, also the paragraph beginning “In rural areas...”.</td>
</tr>
<tr>
<td>R10.3</td>
<td>10.8.</td>
<td>The addition of policy on aftercare at the end of Policy 37.</td>
</tr>
<tr>
<td>R10.4</td>
<td>10.9.</td>
<td>An appendix to connect the figures to policy, in substitution for Table 3 and the paragraph in Policy 37, beginning “Waste local development frameworks should...”, should read on the following lines: &quot;Waste planning authorities should make provision for waste management capacity equal to the amount of waste generated and requiring management...&quot;</td>
</tr>
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<td>Recommendation Number</td>
<td>Report Paragraph Number</td>
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</tr>
<tr>
<td>R10.5</td>
<td>10.17.</td>
<td>No change to the draft strategy on the subject of locational specificity.</td>
</tr>
<tr>
<td>R10.6</td>
<td>10.19.</td>
<td>No changes to take account of the subject of centralisation v. localisation.</td>
</tr>
<tr>
<td>R10.7</td>
<td>10.21.</td>
<td>No change to the draft strategy in respect of cross-boundary movements.</td>
</tr>
<tr>
<td>R10.8</td>
<td>10.22.</td>
<td>No change to the draft strategy in respect of behavioural change.</td>
</tr>
<tr>
<td><strong>Chapter 11 Energy</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R11.1</td>
<td>11.4.</td>
<td>Supporting text is added to explain the monitoring role of the Assembly to ensure delivery of the regional targets.</td>
</tr>
<tr>
<td>R11.2</td>
<td>11.7.</td>
<td>No change to the overall indicative regional target of 6.4% for renewable energy.</td>
</tr>
<tr>
<td>R11.3</td>
<td>11.8.</td>
<td>That the Assembly’s suggestion of 1,315GWh/year for 2010; 3,000GWh/y for 2020; and 3,483GWh/y by 2026 be included separately in the supporting text to Policy 39 and noted within Appendix 5.</td>
</tr>
<tr>
<td>R11.4</td>
<td>11.11.</td>
<td>That the national targets be included in Policy 39 (adjusted to exclude the offshore wind element).</td>
</tr>
<tr>
<td>R11.5</td>
<td>11.12.</td>
<td>That it is made clear within the supporting text that the targets in Appendix 5 are indicative and that major changes will be required within the region if they are to be reached.</td>
</tr>
<tr>
<td>R11.6</td>
<td>11.14.</td>
<td>That supporting text be added to state how much of a sea-change will be needed if the targets are to be reached.</td>
</tr>
<tr>
<td>R11.7</td>
<td>11.18.</td>
<td>An early review of the Energy section of the draft strategy is carried out to include sub-region assessments to ascertain how each sub-regional can contribute to a regional target.</td>
</tr>
<tr>
<td>R11.8</td>
<td>11.20.</td>
<td>A footnote is added to Appendix 5 to explain the inclusion of landfill gas, and paragraph 3.3.73 is expanded to state the position in terms of coal mine methane.</td>
</tr>
<tr>
<td>R11.9</td>
<td>11.22</td>
<td>No change to Policy 39 with regard to the criteria for onshore wind energy and new facilities required for other forms of renewable energy.</td>
</tr>
<tr>
<td>Recommendation Number</td>
<td>Report Paragraph Number</td>
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</tr>
<tr>
<td>R11.10</td>
<td>11.23</td>
<td>No change to the draft strategy as the background detail to the energy policies is adequately set out in the supporting text to the policies.</td>
</tr>
<tr>
<td>R11.11</td>
<td>11.25</td>
<td>The supporting text should highlight the need for local development documents to strongly encourage micro-generation schemes.</td>
</tr>
<tr>
<td>R11.12</td>
<td>11.27</td>
<td>No change to Policy 38 but the supporting text should include a definition of carbon neutral development and operational carbon neutrality.</td>
</tr>
</tbody>
</table>

**Chapter 12 Regional Transport Strategy**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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</thead>
<tbody>
<tr>
<td>R12.1</td>
<td>12.52</td>
<td>That the regional transport strategy element of the draft plan be accepted on an interim basis only to allow the remainder of the plan to proceed to publication and that a comprehensive reappraisal of the regional transport strategy should be undertaken.</td>
</tr>
<tr>
<td>R12.2</td>
<td>12.64</td>
<td>That a review of the regional transport strategy should be undertaken when the reappraisal has been completed.</td>
</tr>
</tbody>
</table>

**Chapter 13 Milton Keynes and South Midlands Sub-Regional Strategy**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
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</thead>
<tbody>
<tr>
<td>R13.1</td>
<td>13.2</td>
<td>That the Milton Keynes South Midlands Sub-Regional Strategy plays a useful role in the strategic planning of this and neighbouring regions, and that it is carried forward to review within an appropriate timescale.</td>
</tr>
<tr>
<td>R13.2</td>
<td>13.14</td>
<td>That appropriate adjustments be made to ensure consistency between the two Part A and B of the Milton Keynes South Midlands Sub-Regional Strategy.</td>
</tr>
<tr>
<td>R13.3</td>
<td>13.17</td>
<td>That the total housing provision for Northamptonshire Implementation Area 2001-2026 is 40,375 and the draft strategy is amended as the Assembly propose in their December 2006 consultation with regards to Northamptonshire Policy 2.</td>
</tr>
<tr>
<td>R13.4</td>
<td>13.20</td>
<td>The draft strategy MKSM Northamptonshire SRS Policy 1 should be amended in accordance with the amendments proposed by the Assembly in their December 2006 consultations (although only total housing market area figures should be included in the table).</td>
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<tr>
<td>Recommendation Number</td>
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<td>This housing provision in the 2021-26 plan period should be re-assessed in any review of the Milton Keynes South Midlands Sub-Regional Strategy.</td>
</tr>
<tr>
<td>R13.5</td>
<td>13.31.</td>
<td>That the district figures are deleted from the draft strategy, leaving the housing market area figures only for the North Northamptonshire Housing Market Area and the West Northamptonshire Housing Market Area. The dividing up of these figures should then be left to the joint core strategies.</td>
</tr>
</tbody>
</table>

**Chapter 14 The Three Cities Sub-Regional Strategy**

<p>| R14.1                  | 14.2.                  | No change in respect of the New Growth Point. |
| R14.2                  | 14.13.                 | That the review required by Three Cities SRS Policy 2 be widened so that is not solely related to the Nottingham principal urban area and that in undertaking that review the Green Belt should be recast so as to provide a separation between Nottingham and Derby without surrounding the city of Nottingham. |
| R14.3                  | 14.15.                 | That reference to the extension of Green Belt in South Derbyshire and North West Leicestershire be excised. |
| R14.4                  | 14.18.                 | That all reference to the location of a sustainable urban extension at Clifton be removed from the regional strategy’s policy and from the preceding spatial analysis. |
| R14.5                  | 14.19.                 | That the draft strategy be amended so as to state clearly that a full sub-regional study be undertaken jointly by the six local planning authorities in the Nottingham Housing Market Area. |
| R14.6                  | 14.29.                 | That the draft strategy be amended by the distribution to districts of the housing figures for the Nottingham Principal Urban Area part housing market area contained in the table following paragraph 14.29. |
| R14.7                  | 14.30.                 | That the Nottingham part of Three Cities SRS Policy 4 should include a proviso that, in the event of the joint preparation of a core strategy producing a revised distribution of the housing market figure based on better evidence of the urban capacity of Nottingham and a revised |</p>
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<tr>
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<td>locational pattern of urban extension, such revised figures should be used instead of the figures in the said policy.</td>
</tr>
<tr>
<td>R14.8</td>
<td>14.36</td>
<td>The deletion of the detailed locations included in brackets in paragraph 5.10.</td>
</tr>
<tr>
<td>R14.9</td>
<td>14.40</td>
<td>The need to adjust the figures for the Leicestershire housing market area in order to reflect the 2004 population projections but other than that we do not agree to the revised distribution put forward by the County Council and we recommend no change in this respect.</td>
</tr>
<tr>
<td>R14.10</td>
<td>14.43</td>
<td>The deletion of the figures in Three Cities SRS Policy 4 for sustainable urban extensions at Loughborough, Hinckley, Melton and Coalville and in relation to Hinckley, Melton and Coalville the words “should be a sustainable urban extension to” be replaced by “which should be directed towards.”</td>
</tr>
<tr>
<td>R14.11</td>
<td>14.44</td>
<td>The deletion of the words “of which should be within or adjoining Leicester PUA and”.</td>
</tr>
<tr>
<td>R14.12</td>
<td>14.46</td>
<td>The deletion of the final paragraph of the Leicester section of Three Cities SRS Policy 4.</td>
</tr>
<tr>
<td>R14.13</td>
<td>14.51</td>
<td>The deletion of Three Cities SRS Policy 3 but that paragraph 4.12 should remain with the addition of a sentence to state “A review of existing green wedges or the creation of new ones in association with development will be carried out through the local development framework process.”</td>
</tr>
<tr>
<td>R14.14</td>
<td>14.57</td>
<td>That Three Cities SRS Policy 4 in respect of South Derbyshire, the words “focussed primarily” be replaced by “located mainly in”.</td>
</tr>
<tr>
<td>R14.15</td>
<td>14.58</td>
<td>That Three Cities SRS Policy 4 in respect of the Amber Valley, the words “focussed primarily” be replaced by “located mainly in”.</td>
</tr>
<tr>
<td>R14.16</td>
<td>14.64</td>
<td>That the last sentence in paragraph 5.8 be replaced by the following text: “In South Derbyshire consideration should be given to the functional relationship between Burton upon Trent and Swadlincote. This may...”</td>
</tr>
<tr>
<td>Recommendation Number</td>
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<td>involve the preparation of a joint study by the respective regional partners to investigate the development potential identified on each side of the regional boundary, including transport improvements such as the A38/A511 corridor and the National Forest rail line. Co-operative working on core strategies in South Derbyshire and East Staffordshire would be appropriate in view of the role being considered for Burton upon Trent through the West Midlands RSS revision and the status of the town as a &quot;new growth point&quot;. As a result of this co-operative working additional provision may be made in South Derbyshire above the levels set out in Policy 14 and Three Cities SRS Policy 4 where this would result in the most sustainable form of development to meet the needs of East Staffordshire as identified in the West Midlands RSS.”</td>
</tr>
</tbody>
</table>

**Chapter 15 The Northern Sub-Regional Strategy**

<p>| R15.1 | 15.7. | That text be added to Part 2 of the draft strategy, commenting upon the social needs of the sub-region and that Policy 8 be modified by the addition of a reference to the improvement of the social infrastructure of the sub-area. |
| R15.2 | 15.10. | No modification to the numbers for North East Derbyshire in the draft strategy. |
| R15.3 | 15.13. | That Policy 14 regarding Bassetlaw be modified to substitute a rate of 280 additional units annually for the 330 proposed in the draft strategy. |
| R15.4 | 15.20. | That Northern SRS Policy 3 be deleted, that its material be added to Northern SRS Policy 1 with the addition of Sutton in Ashfield as a sub-regional centre and the amalgamation of “main” and other” retail and service centres. |
| R15.5 | 15.22. | No modification of the draft strategy on tourism. |
| R15.6 | 15.25. | That continued support be given to Newark as a growth point. |
| R15.7 | 15.29. | That Mansfield’s growth point bid be |</p>
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<td></td>
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<td>reconsidered.</td>
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</table>

**Chapter 16 The Lincoln Policy Area Sub-Regional Strategy**

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<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
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</thead>
<tbody>
<tr>
<td>R16.1</td>
<td>16.4.</td>
<td>That Lincoln Policy Area SRS Policy 5 be excised from the draft strategy.</td>
</tr>
<tr>
<td>R16.2</td>
<td>16.8.</td>
<td>That a note should be added to the individual district figures to say that the numbers may be redistributed on the joint preparation of a core strategy or strategies for the area.</td>
</tr>
<tr>
<td>R16.3</td>
<td>16.10.</td>
<td>That no change be made to the green wedge proposals in the draft strategy.</td>
</tr>
<tr>
<td>R16.4</td>
<td>16.11.</td>
<td>That no change be made to the draft strategy in respect of City centre policy.</td>
</tr>
<tr>
<td>R16.5</td>
<td>16.18.</td>
<td>That the sub-regional transport strategy be revisited in the light of all these comments and those in Chapter 12.</td>
</tr>
<tr>
<td>R16.6</td>
<td>16.31.</td>
<td>That substantial reduction in the number of dwellings to be built on the Western Growth Corridor need not derail the growth point proposal, which we recommend be confirmed.</td>
</tr>
<tr>
<td>R16.7</td>
<td>16.32.</td>
<td>That the second part of Lincoln Policy Area SRS Policy 4 (that relating to the timing and capacity of the proposed urban extensions) should be excised from the draft strategy, and, that to Lincoln Policy Area SRS Policy 3 be added a fourth bullet point – “avoid areas liable to flood”.</td>
</tr>
</tbody>
</table>

**Chapter 17 Grantham and the Eastern Sub-Area (outside the Lincoln Policy Area)**

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>R17.1</td>
<td>17.6.</td>
<td>That continued support be given to Grantham as a growth point.</td>
</tr>
<tr>
<td>R17.2</td>
<td>17.6.</td>
<td>That the words “assisted by the town’s recognition as a new growth point” be added at the end of paragraph 2.5.4.</td>
</tr>
<tr>
<td>R17.3</td>
<td>17.9.</td>
<td>An addition to Policy 4 of the draft strategy (“Concentrating Development in Urban Areas”) to the effect that its policy of concentration should apply to the partial housing market areas of Peterborough (and Sheffield and Rotherham) as to the region’s five principal urban areas.</td>
</tr>
<tr>
<td>R17.4</td>
<td>17.13.</td>
<td>No change to the housing allocations in Policy 14 for West Lindsey.</td>
</tr>
<tr>
<td>R17.5</td>
<td>17.25.</td>
<td>That the strategy proposed by the Assembly, the Environment Agency and the Government Office in the Agreed</td>
</tr>
<tr>
<td>Recommendation Number</td>
<td>Report Paragraph Number</td>
<td>Recommendation</td>
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<tr>
<td></td>
<td></td>
<td>Statement should be used to guide the preparation of local development documents.</td>
</tr>
<tr>
<td>R17.6</td>
<td>17.25.</td>
<td>That an additional policy be added to the draft strategy, following Policy 6 to which it would relate, not only to mandate a coastal strategy, but also that it should be a guide to the preparation of local development documents until such time as the regional strategy itself is rolled forward.</td>
</tr>
<tr>
<td>R17.7</td>
<td>17.26.</td>
<td>That until such a strategy is complete, the Policy 14 housing targets for all three local government areas should include only existing planned commitments and be based on an appropriate annualisation of them.</td>
</tr>
<tr>
<td>Chapter 18 The Peak Sub-Area</td>
<td></td>
<td>The following wording amendments to Policies 9 - 11:</td>
</tr>
<tr>
<td>R18.1</td>
<td>18.15.</td>
<td>- the headings for both policies should refer to <em>Spatial Priorities</em> rather than <em>Development</em> and Policy 9 should state; <em>&quot;in and around the Peak Sub-area&quot;</em></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- in Policies 9 and 10 the first word <em>Development</em> should be replaced by <em>The preparation of policies and programmes</em>;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- in Policy 11, first line, the words <em>relevant public bodies</em> should be replaced by <em>responsible organisations</em> which will then cross-reference to the implementing bodies listed in Appendix 1 which should include the National Trust.</td>
</tr>
<tr>
<td>R18.2</td>
<td>18.22.</td>
<td>No change to the zero figure for housing provision in the Peak District in Policy 14 of the draft strategy.</td>
</tr>
<tr>
<td>R18.3</td>
<td>18.26.</td>
<td>That the figures for housing provision in Policy 14 be increased for the Derbyshire Dales from 150 to 200 and for High Peak from 270 to 300, with a housing market area total increasing from 420 to 500.</td>
</tr>
</tbody>
</table>
| R18.4                  | 18.28.                  | That the scheme (Mottram-Tintwistle bypass) as "within the programme" in Appendix 6 be amended to read "Subject
<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Report Paragraph Number</th>
<th>Recommendation</th>
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</thead>
<tbody>
<tr>
<td>R18.5</td>
<td>18.31.</td>
<td>That the draft strategy should include a brief statement as to the rationale behind SPITS to put the statement in Policy 9 in its proper context and to cross-reference to Policy 42; consider this is best done in a new paragraph to follow 2.5.23.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>to Inquiry and further consideration”</td>
</tr>
</tbody>
</table>

**Chapter 19 Monitoring, Implementation and Review**

| R19.1                  | 19.5.                  | Additional supporting text in the draft strategy that will indicate that much of the information, including essential environmental information, will be collected at the local level. |
| R19.2                  | 19.8.                  | Additional supporting text stating that, at the early plan periods, there may be low delivery that will rise in subsequent periods in order to meet the overall figures. |
| R19.3                  | 19.10.                 | That the review mechanism of the draft strategy should be built in such a way as to take account of all emerging circumstances. |
| R19.4                  | 19.11.                 | That the funding element and implications of the delivery of policies should be outlined in the appropriate text and stated in respect of each proposal within the implementation framework. |
| R19.5                  | 19.12.                 | The nomination of key delivery agencies and the inclusion of timescales and trajectories for implementation and delivery in the implementation framework. |
| R19.6                  | 19.18.                 | Remove Appendix 1 from the draft strategy and replace with a self-standing implementation plan that is positioned alongside the draft strategy.
EiT TIMETABLE

Venue will be Devonshire Place, Leicester with the exception of Week 6
Examination start time will normally be 09.30 a.m. Tuesday-Friday with the exception of:
(i) Tuesday 22 May 2007 and (ii) Tuesday 29 May 2007 when the Examination will open at 10.00 a.m.

<table>
<thead>
<tr>
<th>DATES</th>
<th>TOPIC</th>
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</thead>
<tbody>
<tr>
<td>Wk 1</td>
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| Tuesday   | Opening
<pre><code>       | Matter 1 – Style of draft RSS (until 13.00) |
</code></pre>
<p>| 22-25 May |                                            |
| Tuesday 22 May 10.00 |            |
| Tuesday 22 May 14.00 | Matter 2A – Content of draft RSS (Background &amp; Policy 1) |
| Wednesday 23 May 09.30 | Matter 2B – Content of draft RSS (Background &amp; Policy 1) |
| Thursday 24 May 10.00 | Technical Seminar |
| Friday 25 May 09.30 | Matter 3 – Spatial Strategy (Policies 2-13) |
| Wk 2      |                                            |
| Tuesday 29 May 10.00 | Matter 4A – Housing (Policies 14, 17, 18) |
| Wednesday 30 May 09.30 | Matter 4A – Housing (Policies 14, 17, 18) |
| Thursday 31 May 09.30 | Matter 4B – Housing (Policy 14) |
| Friday 1 June 09.30 | Matter 4C - Housing (Policy 15) |
| Wk 3      |                                            |
| Tuesday 5 June 09.30 | Matter 4D – Housing (Policy 16) (09.30-13.00) |
| Tuesday 5 June 14.00 | Matter 5A – Economic Strategy (Policies 19 &amp; 20) |
| Wednesday 6 June 09.30 | Matter 5A – Economic Strategy (Policies 19 &amp; 20) |
| Thursday 7 June 09.30 | Matter 5B – Economic Strategy (Policy 21) |
| Friday 8 June 09.30 | Matter 5C – Economic Strategy (Policy 23) |
| 12 – 15 June | RECESS                                    |
| Wk 4      |                                            |
| Tuesday 19 June 09.30 | Matter 6 - Tourism, Natural &amp; Cultural Resources |
| Tuesday 19 June 14.00 | Matter 6A Tourism (Policy 24) (09.30-13.00) |
| Wednesday 20 June 09.30 | Matter 6C Water Management (Policies 32-35) (14.00-17.00) |
| Wednesday 20 June 14.00 | Matter 6B Natural &amp; Cultural Heritage(Policies 26-31 (09.30-13.00)) |
| Thursday 21 June 09.30 | Matter 7A (14.00-17.00) – Minerals (Policy 36) |
| Thursday 21 June 11.30 | Matter 7B – Waste (Policy 37) |
| Friday 22 June 09.30 | Matter 7C – Energy (Policies 38-39) |
| Wk 5      |                                            |
| Tuesday 26 June 09.30 | Matter 9 – Three Cities Sub-Area |
| Tuesday 26 June 09.30 | Matter 9A (09.30-13.00) |</p>
<table>
<thead>
<tr>
<th>Date</th>
<th>Matter</th>
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<tbody>
<tr>
<td>Tuesday 26 June 14.00</td>
<td>Matter 9B – Nottinghamshire issues</td>
</tr>
<tr>
<td>Wednesday 27 June 09.30</td>
<td>Matter 9B – Nottinghamshire issues (continued 09.30-11.00)</td>
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<tr>
<td>Wednesday 27 June 11.30</td>
<td>Matter 9C – Leicestershire issues</td>
</tr>
<tr>
<td>Thursday 28 June 09.30</td>
<td>Matter 9D – Derbyshire issues</td>
</tr>
<tr>
<td>Friday 29 June 09.30</td>
<td>Matter 9E – Burton/Swadlincote/Coalville issues</td>
</tr>
<tr>
<td>Wk 6 3-6 July (venue: Lincoln University) Tuesday 3 July 09.30</td>
<td>Matter 11A - Lincolnshire Policy Area</td>
</tr>
<tr>
<td>Wednesday 4 July 09.30</td>
<td>Matter 11A - Lincolnshire Policy Area (continued)</td>
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<tr>
<td>Thursday 5 July 09.30</td>
<td>Matter 11B – Newark, Grantham &amp; rest of Eastern Sub-area</td>
</tr>
<tr>
<td>Friday 6 July 09.30</td>
<td>Matter 11B – Newark, Grantham &amp; rest of Eastern Sub-area (continued)</td>
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<tr>
<td>Wk 7 10-13 July Tuesday 10 July 09.30</td>
<td>Matter 10 – Northern Sub-Area</td>
</tr>
<tr>
<td>Wednesday 11 July 09.30</td>
<td>Matter 10 – Northern Sub-Area (continued 09.30-13.00)</td>
</tr>
<tr>
<td>Wednesday 11 July 14.00</td>
<td>Matter 14 – MKSM/Southern Sub-Area</td>
</tr>
<tr>
<td>Thursday 12 July 09.30</td>
<td>Matter 12 – Peak Sub-Area (Policies 9-11)</td>
</tr>
<tr>
<td>Friday 13 July 10.00</td>
<td>Matter 6C – Over-run (Lincolnshire Flooding)</td>
</tr>
<tr>
<td>Wk 8 17-19 July Tuesday 17 July 09.30</td>
<td>Matter 8 – Regional Transport Strategy (Policies 41-54)</td>
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<tr>
<td>Wednesday 18 July 09.30</td>
<td>Matter 8 – Regional Transport Strategy (Policies 41-54) (continued 09.30-13.00)</td>
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<tr>
<td>Wednesday 18 July 14.00</td>
<td>Matter 13 – Monitoring, Implementation and Review (Policy 55)</td>
</tr>
<tr>
<td>Thursday 19 July 09.30</td>
<td>Matter 15 - Plenary Session</td>
</tr>
</tbody>
</table>

Close
EAST MIDLANDS EXAMINATION IN PUBLIC
LIST OF MATTERS AND PARTICIPANTS

Matter 1. Style of the draft Regional Spatial Strategy (2000 words maximum)

(i) Is the style of the policies appropriate, having regard to PPS11, 1.18? Do Sub-Area Priorities relate to the Sub-Regional Strategies? Is it appropriate to this section that it should be hierarchical?

(ii) Is it appropriate that sub-regional strategies cover only parts of the region? Should the whole region be covered by sub-regional strategies?

(iii) Is the Key Diagram appropriately drafted? Does it show the right amount of detail?

(iv) To what extent is uniformity desirable in Part 2?

(v) Are all the Appendices appropriate? What is the status of each of them? Should any be either (a) brought into policy/supporting text or (b) be deleted?

(vi) Is Policy 3 regionally specific and is the Spatial Strategy section the appropriate location for this policy?

(vii) Do Policies 6-8 and 12-13 have a place in the Part One Regional Spatial Strategy or would they more appropriately sit within the relevant Part Two sections?

(viii) Should there be a vision for the region in 2026 (PPS11, 1.7)?

(ix) Would the Objectives be more specifically directed if included in policy or supporting text? Should “decent homes for all” be an objective?

Participants Matter 1

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1</td>
<td>East Midlands Regional Assembly</td>
</tr>
<tr>
<td>2</td>
<td>Government Office for the East Midlands (1118)</td>
</tr>
<tr>
<td>3</td>
<td>Environment Agency (1231)</td>
</tr>
<tr>
<td>4</td>
<td>1 seat for representative(s) of all County/Unitary Authorities (including Peak District NPA) (hot seating will be required)</td>
</tr>
<tr>
<td>5</td>
<td>Highways Agency (1190)</td>
</tr>
<tr>
<td>6</td>
<td>One seat to be shared by all District/Borough Councils perhaps through Planning Officers’ Society</td>
</tr>
<tr>
<td>7</td>
<td>EM Friends of the Earth (1281)</td>
</tr>
<tr>
<td>8</td>
<td>1 seat for Natural England/English Heritage (878/588) (hot seating will be required)</td>
</tr>
<tr>
<td>9</td>
<td>Campaign to Protect Rural England EM (781)</td>
</tr>
<tr>
<td>10</td>
<td>TCPA (1158)</td>
</tr>
<tr>
<td>11</td>
<td>Brethren’s Gospel Trusts (629) (for faith communities)</td>
</tr>
<tr>
<td>12</td>
<td>Redrow Homes (1176)</td>
</tr>
<tr>
<td>13</td>
<td>Home Builders’ Federation (1210)</td>
</tr>
<tr>
<td>14</td>
<td>Arlington Securities (622)</td>
</tr>
<tr>
<td>15</td>
<td>East Midlands Development Agency (1174)</td>
</tr>
</tbody>
</table>
Matter 2. Content of the draft Regional Spatial Strategy (Background and Policy 1)

Matter 2A. Relationship to European and National Policy and trends (2000 words maximum)

(i) Does the overall strategy of the draft RSS adequately reflect national policies and the external relationships of the Region, international and European?

(ii) How do the policies and proposals of the draft RSS relate to the long term economic trends for England as set out in "Regional Futures: England’s Regions in 2030"?

Participants Matter 2A

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<td>1</td>
<td>East Midlands Regional Assembly</td>
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<td>3</td>
<td>East Midlands Development Agency (1174)</td>
<td>4</td>
</tr>
<tr>
<td>5</td>
<td>Environment Agency (1231)</td>
<td>6-7</td>
</tr>
<tr>
<td>8</td>
<td>Highways Agency (1190)</td>
<td>9</td>
</tr>
<tr>
<td>10</td>
<td>East Midlands Environmental Link (780)/Campaign to Protect Rural England EM (781)/ EM Friends of the Earth (1281) (Hot seating will be required)</td>
<td>11</td>
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<tr>
<td>12</td>
<td>English Heritage (588)</td>
<td>13-14</td>
</tr>
<tr>
<td>15</td>
<td>Brethren’s Gospel Trusts (629) (for faith communities)</td>
<td>16</td>
</tr>
<tr>
<td>17</td>
<td>Hallam Land Management (1177)</td>
<td>18</td>
</tr>
</tbody>
</table>
Matter 2B. Climate Change and Sustainable Development (2000 words maximum)

(i) Does the draft RSS provide an appropriate, realisable and sustainable strategy for the region?

(ii) In what way is Regional Core Objective I on climate change taken account of in the locational policies and proposals of draft Regional Spatial Strategy?

(iii) Should there be an over-arching policy on achieving sustainable development?

(iv) Are any planning interventions foreseen that would affect these long-term trends?

Participants Matter 2B

<table>
<thead>
<tr>
<th></th>
<th>East Midlands Regional Assembly</th>
<th></th>
<th>Government Office for the East Midlands (1118)</th>
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<tbody>
<tr>
<td>3</td>
<td>East Midlands Development Agency (1174)</td>
<td>4</td>
<td>1 seat for representative(s) of all County/Unitary Authorities (including Peak District NPA) (hot seating will be required)</td>
</tr>
<tr>
<td>5</td>
<td>Environment Agency (1231)</td>
<td>6-7</td>
<td>Two seats to be shared by all District/Borough Councils perhaps through Planning Officers’ Society</td>
</tr>
<tr>
<td>8</td>
<td>Highways Agency (1190)</td>
<td>9</td>
<td>TCPA (1158)</td>
</tr>
<tr>
<td>10</td>
<td>East Midlands Biodiversity Forum (1224)/(East Midlands Environmental Link (780)/Campaign to Protect Rural England EM (781)/ EM Friends of the Earth (1281) (Hot seating will be required)</td>
<td>11</td>
<td>Natural England (878)</td>
</tr>
<tr>
<td>12</td>
<td>English Heritage (588)</td>
<td>13</td>
<td>Brethren’s Gospel Trusts (629) (for faith communities)</td>
</tr>
<tr>
<td>14</td>
<td>Various clients (304,534,1120, 1144) (David Lock Assocs)</td>
<td>15</td>
<td>Various Landowners (1272, 1273, 1274) (DLP Planning Limited)</td>
</tr>
<tr>
<td>16</td>
<td>Home Builders’ Federation (1210)</td>
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</table>

(i) Does Policy 2 provide adequate guidance; what is its role and function vis a vis Policy 4? Following the issue of PPS3 is it appropriate to include a sequential approach to site allocation?

(ii) What is the relationship between Principal Urban Areas, Sub-Regional Centres and other settlements listed in Policy 4? Does the Regional Spatial Strategy need an urban hierarchy below Sub-Regional Centres? How would the New Growth Points fit into a hierarchy?

(iii) Are rural issues, including the development needs of small towns adequately addressed?

(iv) Are the Sub-Areas correctly identified (section 2.5)?

<table>
<thead>
<tr>
<th>Participants Matter 3</th>
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<tbody>
<tr>
<td>1 East Midlands Regional Assembly</td>
</tr>
<tr>
<td>3 East Midlands Development Agency (1174)</td>
</tr>
<tr>
<td>5 Derbyshire County/Derby City Council (843/833) (hot seating will be required)</td>
</tr>
<tr>
<td>7 Lincolnshire County/Lincoln City Council (298/589) (hot seating will be required)</td>
</tr>
<tr>
<td>9 East Midlands Rural Affairs Forum (327)</td>
</tr>
<tr>
<td>11 Brethren’s Gospel Trusts (629) (for faith communities)</td>
</tr>
<tr>
<td>13 Home Builders’ Federation (1210)</td>
</tr>
<tr>
<td>15 East Midlands Development Group (862) (Barton Willmore)</td>
</tr>
<tr>
<td>17 Midlands Rural Housing and Village Development Assoc Ltd (74)</td>
</tr>
</tbody>
</table>
Matter 4. Housing (Policies 14 – 18)

**Matter 4A: Overall housing provision (2000 words maximum) (Policies 14, 17 & 18)**

(i) Is the overall figure appropriate? What difference would there be if the 2004-based population/household projections were used? Is the spatial strategy of the RSS sufficiently robust to accommodate any resulting additional provision without significant amendment? Is the methodology and evidence base for the regional figure sound?

(ii) How should the Plan respond to these factors? To what extent should the Plan aim to meet demand? In what way has Government policy, notably the Sustainable Communities Plan, shaped the Plan? Are the Plan’s aspirations the right ones for meeting housing need/demand e.g. are they desirable, realistic and defensible and are they clearly and consistently articulated?

(iii) Do the housing policies adequately reflect national guidance in PPS3? Will they help to provide an adequate level of affordable housing and achieve balanced housing markets?

(iv) Are the targets (in Policy 17) for previously developed land and vacancy rates appropriate? Should there be individual targets for sub-areas and/or HMAs?

(v) Are the areas specified in Policy 18 the only areas for cross-boundary working?

**Participants Matter 4A**

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<td>1</td>
<td>East Midlands Regional Assembly</td>
<td>Government Office for the East Midlands (1118)</td>
</tr>
<tr>
<td>3</td>
<td>National Housing &amp; Planning Advice Unit</td>
<td>1 seat for all County/Unitary Authorities (including Peak District NPA) (hot seating will be required)</td>
</tr>
<tr>
<td>4</td>
<td>1 seat for adjoining Regional Assemblies (hot seating will be required)</td>
<td>6-10 District/Borough Council (1 seat for each County totalling 5 seats overall - hot seating will be required)</td>
</tr>
<tr>
<td>5</td>
<td>1 seat for adjoining Regional Assemblies (hot seating will be required)</td>
<td>National Housing Federation (1139)</td>
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<td>11</td>
<td>National Housing Federation (1139)</td>
<td>Home Builders’ Federation (1210)</td>
</tr>
<tr>
<td>13</td>
<td>East Midlands Development Agency (1174)</td>
<td>Various clients (304,534,1120, 1144) (David Lock Assocs)</td>
</tr>
<tr>
<td>15</td>
<td>(East Midlands Environmental Link (780)/Campaign to Protect Rural England EM (781)/EM Friends of the Earth (1281) (Hot seating will be required)</td>
<td>Various clients (1195, 1198) (DPDS)</td>
</tr>
<tr>
<td>17</td>
<td>Brethren’s Gospel Trusts (629) (for faith communities)</td>
<td>Lincolnshire LGA (839)/Lincolnshire Assembly (1135) (Hot seating will be required)</td>
</tr>
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</table>
Matter 4B: Distribution of housing provision around the region (2000 words maximum)

(i) Is the methodology and evidence base underpinning the scale and distribution of housing in Policy 14 sound? Does the amount and distribution of housing reflect and reinforce proposals for the spatial distribution of economic growth and regeneration priorities (including HMAs)? Does the distribution of housing reflect the draft RSS’s regional and sub-regional spatial framework?

(ii) In calculating the capacity of each area to accommodate additional development what assumptions have been made about density and should the RSS contain policy guidance on minimum density?

(iii) Is the breakdown of the overall figure for the region between sub-areas appropriate?

Participants Matter 4B

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<td>5</td>
<td>National Housing Federation (1139)</td>
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<tr>
<td>11</td>
<td>Gotham Parish Council (344)/Barton in Fabis Parish Council (658) (Hot seating will be required)</td>
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<td>13</td>
<td>East Midlands Development Agency (1174)</td>
</tr>
<tr>
<td>15</td>
<td>East Midlands Rural Affairs Forum (327)</td>
</tr>
<tr>
<td>17</td>
<td>Various clients (755-762, 847, 874) (Pegasus Planning Group)</td>
</tr>
</tbody>
</table>
Matter 4C: Affordable housing provision (Policy 15) (2000 words maximum)

(i) Are the proposals on the overall level of need and provision for affordable housing, including various forms of intermediate market housing, soundly based? Is it appropriate to specify % targets at HMA level?

(ii) Are the policies dealing with affordable housing clear in their terminology, internally consistent, monitorable and appropriate for inclusion in the Regional Spatial Strategy given the planning framework at national and local levels?

Participants Matter 4C

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<thead>
<tr>
<th></th>
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<tbody>
<tr>
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</tr>
<tr>
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<td>National Housing &amp; Planning Advice Unit</td>
</tr>
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Matter 4D: Gypsy and traveller provision (Policy 16) (2000 words maximum)

(i) Does Policy 16 deal appropriately with the requirements of Circular 01/2006 – Planning for Gypsy and Traveller Caravan Sites?

Participants Matter 4D

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</table>
Matter 5. Economic Strategy


(i) Is Policy 19 on the general nexus (interconnection) of employment/housing/transport adequately expressed?

(ii) What are the expectations of regeneration in maintaining population and managing contraction? What will happen in these areas?

(iii) Is it right not to have indicative figures for employment land needs? What use should be made of the Roger Tym and other studies in drawing up Local Development Documents?

(iv) Are there adequate policies to steer external proposals to the locations in accordance with the spatial strategy (hierarchies, etc)?

(v) Does the RSS provide adequate context and guidance for strategic distribution sites? Should broad locations for these sites be identified?

Participants Matter 5A

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</table>
Report of the examination in public of draft regional spatial strategy for the East Midlands

Matter 5B: Retail Development (Policy 21) (2000 words maximum)

(i) Does the Policy adequately cover all town centre uses?

(ii) Is there an independent retail hierarchy?

Participants Matter 5B

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Matter 5C: Rural Diversification (Policy 23) (2000 words maximum)

(i) Does the RSS provide sufficient guidance for the preparation of Local Development Documents? Do the policies of this section appropriately reflect the advice in PPS7?

Participants Matter 5C

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</table>
Matter 6. Tourism, Natural and Cultural Resources (Policies 24 – 35)
Matter 6A: Tourism (2000 words maximum)

(i) Should there be an express set of policies for tourism and leisure?

(ii) Are there well defined tourism strategies for the development of tourism in the principal tourist areas?

Participants Matter 6A

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<td>11</td>
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<td>15</td>
<td>Sport England (1268)</td>
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Participants Matter 6A:

1. East Midlands Regional Assembly
2. Government Office for the East Midlands (1118)
3. Environment Agency (1231)
4. East Midlands Tourism (1150)
5. 1 seat for the all County/Unitary Authorities (including Peak District NPA) (hot seating will be required)
6. British Waterways (598)
7. One seat to be shared by all District/Borough Councils perhaps through Planning Officers’ Society
8. Council for National Parks (1199)
9. East Midlands Strategic River Corridors Group (254)
10. English Heritage (588)/Natural England (878) (hot seating will be required)
11. British Holiday & Home Parks Assoc (BH & HPA) (1182)
12. Culture East Midlands (656)
13. National Trust (1206)
14. East Midlands Environmental Link (780)/Campaign to Protect Rural England EM (781)/EM Friends of the Earth (1281) (Hot seating will be required)
15. Sport England (1268)
16-17. Bourne Leisure Ltd (1172) (Nathaniel Lichfield & Partners)/Country Land & Business Association (1137) (hot seating will be required)
Matter 6B: Natural and Cultural Heritage (2000 words maximum)

(i) Does the RSS provide an appropriate steer in relation to green infrastructure and biodiversity aspirations and requirements? How will these policies be implemented?

(ii) Does the RSS introduce additional levels of landscape or other natural/cultural designation that are not appropriate at this level and/or do not have regional specificity?

(iii) Is the RSS sufficiently robust in protecting the Region’s natural and historic heritage?

(iv) Are policies sufficiently regionally specific; do they repeat national policies unnecessarily?

(v) Are the Derwent Valley Mills World Heritage Site/Peak National Park adequately dealt with in the policies of the draft RSS?

Participants Matter 6B

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<td>Natural England (878)</td>
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</table>
Matter 6C: Water Management (2000 words maximum)

(i) Are water resources and the capacity of both water and sewerage infrastructure adequately considered in the draft RSS?

(ii) Is there a need for express flood risk policies beyond PPS25? Is the need rather that they should be within spatial strategy and sub-regional assessments?

(iii) Is the management of the Lincolnshire Coast (policy 34) better a matter for the Sub-Area strategy in Part 1 of the plan?

Participants Matter 6C

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<td>Natural England (878)</td>
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Matter 7A: Minerals (2000 words maximum)

(i) Does Policy 36 add anything useful to MPS1 and the Annexes? Should RAWP targets be incorporated into the Plan, and extended to 25 years?

(ii) What provision should be made in the Plan for coal mining and protection of resources?

Participants Matter 7A

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Matter 7B: Waste Reduction and Management (2000 words maximum)

(i) Should RWS targets be incorporated into the Plan? How will such targets be implemented at the local planning levels?

(ii) Is the waste section (Policy 37 and supporting text) fully compliant with PPS10? If not how could it be amended?

Participants Matter 7B

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Matter 7C: Energy Reduction and Efficiency (2000 words maximum)

(i) Are the renewable energy policies consistent with national guidance?

(ii) Is the draft RSS sufficiently flexible to adapt to any outcomes of the Energy Review?

(iii) Do the policies of the RSS adequately reflect current and future development in this rapidly developing area?

Participants Matter 7C

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Matter 8. Regional Transport Strategy (2000 words maximum)

(i) How can a realistic balance of housing/employment/transport proposals be achieved if transport proposals are not fully accounted for in the proposals of the Plan?

(ii) What is the status of Appendix 6?

(iii) If Appendix 6 is part of the Plan, do the proposals represent an adequate and sustainable response to housing and employment needs and to the spatial strategies generally?

(iv) What is the regional (East Midlands) role of airports located outside the region but close to it? Should they be referred to in the Key Diagram?

(v) Are the proposed traffic reduction and behavioural change policies (Policies 43 and 44) adequate and realistic?

Participants Matter 8

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Matter 9. Three Cities Sub-Area
Matter 9A: General (2000 words maximum)

(i) Is the level of detail appropriate for the preparation of Local Development Documents? Is there consistency as to the level of detail?

(ii) Is the housing provision for the sub-area and distribution between the constituent HMAs appropriate and achievable? Have the HMAs been adequately defined?

(iii) Are cross-boundary issues adequately covered?

(iv) Is the definition in text of the Principal Urban Area adequate?

(v) Is the possibility of releasing surplus employment sites adequately recognised eg in housing allocations?

(vi) Is the Government’s proposal for a Growth Point in the Three Cities Sub-Area covered adequately in the draft Regional Spatial Strategy?

Participants Matter 9A

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Matter 9B: Nottinghamshire issues (2000 words maximum)

(i) Should the Spatial Diagram show broad locations of major areas of proposed new development? If so how should they be shown?

(ii) Is there a real need to review the Green Belt around Nottingham?

(iii) Is there a need to review the Green Belt/Wedges anywhere else?

(iv) Has the urban capacity of Nottingham been adequately assessed? Is the major development proposed south of Clifton (a) necessary (b) in the right place (ie not to the south east, or to the north or north east of Nottingham)?

Participants Matter 9B

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<td>East Midlands Development Agency (1174)</td>
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<td>Nottinghamshire County Council (403)</td>
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<tr>
<td>5</td>
<td>Nottingham City Council (751)</td>
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<td>Rushcliffe BC (107), Gedling BC (230) and one seat for all other Borough/District Councils in the Nottinghamshire (Hot seating will be required)</td>
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<tr>
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<td>2 seats for Parish Councils in Nottingham</td>
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<td>Derbyshire &amp; Nottinghamshire Chamber of Commerce (1277)</td>
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<td>Nottinghamshire Rural Community Council (1264)</td>
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<td>Home Builders’ Federation (1210)</td>
<td>15</td>
<td>Rushcliffe Residents Association (267)</td>
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<td>CPRE EM (781)/Nottinghamshire Birdwatchers (619) (hot seating will be required)</td>
<td>17</td>
<td>Various clients (755, 847) (Pegasus Planning Group)/Various clients (1196) (DPDS)/The Crown Estates (1113) (Entec) (hot seating will be required)</td>
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<td>Various clients (537/1270) (RPS Planning)/Various clients (538) (Stoneleigh Planning)/ Various clients (877/1106) (Addleshaw Goddard) (hot seating will be required)</td>
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676 There will be guaranteed seats for each Parish Council/Meeting for the discussion of south of Clifton.
677 Guaranteed seats for Pegasus Planning and DPDS for the discussion of south of Clifton.
Matter 9C: Leicestershire issues (other than Burton/Swadlincote/Coalville) (2000 words maximum)

(i) Should the Spatial Diagram show broad locations of major areas of proposed new development? If so how should they be shown?
(ii) Is there a need to review the Green Belt/Wedges in Leicestershire?
(iii) Has the urban capacity of Leicester been adequately addressed? Is there a need for further urban extension to this city?
(iv) Does the draft Plan adequately and properly address development questions in north Leicester?

Participants Matter 9C

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<thead>
<tr>
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<td>12</td>
<td>CPRE EM (781)</td>
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<td>14</td>
<td>De Montfort University (223) (RPS Planning)</td>
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<td>Hallam Land Management (1177)/Various clients (562/563) (Boyer Planning) (hot seating will be required)</td>
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</table>

678 Guaranteed seats for all Borough/District Councils
679 Guaranteed seats for all Parish Councils
680 Guaranteed seat for Hallam Land Management for the discussion north of Leicester
Matter 9D: Derbyshire issues (2000 words maximum)

(i) Should the Spatial Diagram show broad locations of major areas of proposed new development? If so how should they be shown?

(ii) Is there a real need to review the Green Belt around Derby?

(iii) Has the urban capacity of Derby been adequately addressed? Is there a need for further urban extension to this city?

Participants Matter 9D

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<td>Derbyshire County Council (843)</td>
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<td>Derby City Council (833)</td>
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<td>3 seats for all Borough/District Councils in Derbyshire (Hot seating will be required)</td>
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<td>9-10</td>
<td>2 seats Town/Parish Councils in Derbyshire (Hot seating will be required)</td>
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<td>Derbyshire &amp; Nottinghamshire Chambers of Commerce (1277)</td>
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<td>South Derbyshire Local Strategic Group (1229)</td>
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<td>Home Builders’ Federation (1210)</td>
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<td>Derby &amp; S Derbyshire Friends of the Earth (1263)/CPRE EM (781) (hot seating will be required)</td>
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<td>Derby Cityscape Ltd (1114)</td>
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Matter 9E: Burton/Swadlincote/Coalville issues (2000 words maximum)

(i) Should the Spatial Diagram show broad locations of major areas of proposed new development? If so how should they be shown?

(ii) Does the draft Plan adequately and properly address development questions in Burton/Swadlincote/Coalville?

Participants Matter 9E

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<td>West Midlands Regional Assembly (1166)/Staffordshire County Council (1226)</td>
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<td>Seats for affected Borough/District Councils including East Staffordshire (820)</td>
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<td>Seats for Parish Councils affected 681</td>
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<td>Leicestershire Chambers of Commerce (311)</td>
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<td>Various clients (773) (Andrew Martin Assocs)</td>
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<td>Ashby de la Zouch Civic Society (621)</td>
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<td>CPRE EM (781)</td>
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<td>Derby County Council (843)</td>
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681 Guaranteed seats for each Parish Council within the affected area
Matter 10. Northern Sub-Area (2000 words maximum)  

(i) Is the level of detail appropriate for the preparation of Local Development Documents? Is there consistency as to the level of detail?

(ii) Is the housing provision for the sub-area and distribution between the constituent HMAs appropriate and achievable? Have the HMAs been adequately defined?

(iii) Are cross-boundary issues adequately covered?

(iv) What is meant in Policy 8 by “providing jobs and services”? Do we mean “attracting them”? If so, how? Is there more to regeneration than “providing jobs”? What is the expected outcome of Policy 8?

(v) Is SRS Policy 1 intended to apply to all forms of “development” or only to housing? Is there sufficient consistency between this policy and Regional Plan Policy 8? Does SRS Policy 1 develop Policy 8 sufficiently to provide adequate guidance for LDF formulation? Should either or both policies link to transport policy? Does SRS Policy 1 deal adequately with rural regeneration issues?

(vi) To what extent do the priorities for employment regeneration set out in SRS Policy 2 relate to the locations for housing development identified in Policy 1? Are the named locations appropriate at sub-regional level? What are the links between economic decline and regeneration and social considerations?

(vii) Should the Spatial Diagram show the locations for urban extensions named in SRS Policy 1?

(viii) To what extent are the areas identified in SRS Policy 2 for site selection compatible with the Green Wedges protected under Policy 3 and shown on the diagram? Are the boundaries shown on the diagram too specific for an SRS?

(ix) Is the reference to the “established strategic gaps” in paragraph 4.13 adequate for policy purposes or should a specific policy be included for this sub-area with general locations shown on the Spatial Diagram?

(x) To what extent is the identification of smaller centres for retail development in SRS Policy 3 compatible with Regional Plan Policy 21 and the “other urban centres” under SRS Policy 1? Is it appropriate to name “village centres” at sub-regional level?

(xi) Should there be a sub-regional policy for tourism linked to Plan Policy 21?

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682 NB: The proposed growth point at Newark will be considered alongside those for Lincoln & Grantham in Matter 11 for the convenience of Newark based participants.
**Participants Matter 10**

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<td>Nottinghamshire County Council (403)</td>
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<td>Derbyshire County Council (843)</td>
<td>6</td>
<td>Nottingham/Derby City Councils (751/833) (hot seating will be required)</td>
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<tr>
<td>7-9</td>
<td>3 seats for all Borough/District Councils in the sub-area (Hot seating will be required)</td>
<td>10-11</td>
<td>2 seats for all Parish Councils in sub-area (Hot seating will be required)</td>
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<td>12</td>
<td>Derbyshire &amp; Nottinghamshire Chamber of Commerce (1277)</td>
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<td>Nottinghamshire Rural Community Council (1264)</td>
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<td>Home Builders’ Federation (1210)</td>
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<td>16</td>
<td>Rippon Homes (324) (RPS Planning)/ Alliance SSP (1271) (DLP Planning Ltd (hot seating will be required)</td>
<td>17</td>
<td>EM Planning Aid (881)</td>
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Matter 11. Lincoln Policy Area/Eastern Sub-Area plus Newark

Matter 11A: Lincoln Policy Area (2000 words maximum)

(i) Is the level of detail appropriate for the preparation of Local Development Documents? Is there consistency as to the level of detail?

(ii) Is the housing provision for the sub-area and distribution between the constituent HMAs appropriate and achievable? Have the HMAs been adequately defined?

(iii) Does the identification of Lincoln as a “new growth point” accord with DCLG criteria and, in particular, are the proposals for each of them sustainable, acceptable environmentally and realistic in terms of infrastructure?

(iv) Are cross-boundary issues adequately covered?

(v) Does the Lincoln sub-regional strategy in the recently adopted Lincolnshire Structure Plan continue to provide adequate guidance for the preparation of plans at the local level?

(vi) Are the general employment proposals satisfactory?

(vii) Should there be a policy governing the scale of retail development in Lincoln Town Centre?

(viii) To what extent are the areas identified in SRS Policy 2 for site selection compatibly with the Green Wedges protected under Policy 3 and shown on the diagram? Are the boundaries shown on the diagram too specific for an SRS?

Participants Matter 11A

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<td>3</td>
<td>East Midlands Development Agency (1174)</td>
</tr>
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<td>4</td>
<td>Lincolnshire County Council (298)</td>
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<tr>
<td>5</td>
<td>Lincoln City Council (589)</td>
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<td>6-8</td>
<td>Seats for all Borough/District Councils in Lincoln Policy Area (Hot seating may be required)</td>
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<tr>
<td>9-10</td>
<td>Seats for each Parish Councils in Lincoln Policy Area (Hot seating may be required)</td>
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<td>Home Builders’ Federation (1210)</td>
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<tr>
<td>12</td>
<td>East Midlands Environment Link (780)/EM Friends of the Earth (1281) (hot seating will be required)</td>
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<tr>
<td>13</td>
<td>University of Lincoln (752)(Drivers Jonas)</td>
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<td>14</td>
<td>Various clients (771) (DNS Stuart)</td>
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<td>15</td>
<td>Various clients (774) (Andrew Martin Assocs)</td>
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<td>16</td>
<td>English Heritage (588)</td>
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<td>Various clients (877) (Addleshaw Goddards LLP)</td>
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</tbody>
</table>
Matter 11B: Newark, Grantham & rest of Eastern Sub-area (2000 words maximum)

(i) Is the level of detail appropriate for the preparation of Local Development Documents? Is there consistency as to the level of detail?

(ii) Is the housing provision for the sub-area and distribution between the constituent HMAs appropriate and achievable? Have the HMAs been adequately defined?

(iii) Does the identification of Newark (in the Northern Sub-area) and Grantham as “new growth points” accord with DCLG criteria and, in particular, are the proposals for each of them sustainable, acceptable environmentally and realistic in terms of infrastructure?

(iv) Are cross-boundary issues adequately covered?

(v) In Policy 6 should there be:

   (a) more recognition of the role of villages as service centres in the more remote rural areas?
   (b) more emphasis on the need to achieve a balance between housing and employment provision in order to reduce the need to travel?
   (c) additional proposals for the regeneration of Gainsborough, Mablethorpe and Skegness?

(vi) Are the general employment proposals satisfactory?

(vii) Does the text in paragraph 2.5.11 strike an appropriate balance between environmental issues affecting the area of the Wash and the objectives for port development set out in Policy 7?
### Participants Matter 11B

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<td>East Midlands Development Agency (1174)</td>
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<td>5</td>
<td>East of England Regional Assembly (1161)/Peterborough City Council (1279)</td>
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<td>7-9</td>
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<td>12</td>
<td>Lincolnshire Wolds Countryside Service (626)/Lincolnshire Wildlife Trust (1238) (hot seat will be required)</td>
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<td>14&lt;sup&gt;684&lt;/sup&gt;</td>
<td>Farndon Residents Environment Group (257)</td>
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<td>16</td>
<td>Home Builders’ Federation (1210)</td>
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<tr>
<td>18</td>
<td>Environment Agency (1231)/Eastern Sea Fisheries Joint Committee (ESFJC)&amp; Natural England (878)&lt;sup&gt;685&lt;/sup&gt;/Anglian Water Services (110)</td>
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<tr>
<td>20</td>
<td>Various clients (1218, 1233) (Smith Stuart Reynolds)</td>
<td>21</td>
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</tbody>
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<sup>683</sup> Guaranteed seat when own area discussed  
<sup>684</sup> Seat available only for Newark area discussion  
<sup>685</sup> ESFJC & Natural England in respect of Question vii only
Matter 12. Peak Sub-Area (2000 words maximum)

(i) Is the draft RSS sufficiently clear about the distinction of policy and proposals between areas within the National Park and those outside it?

(ii) Are the policies for the towns outside the National Park appropriate or excessively restrictive?

(iii) Are the policies for affordable housing in the National Park appropriate and likely to be effective?

(iv) Does the draft RSS deal satisfactorily with national and regional transport routes across the Park?

Participants Matter 12

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<td>4-5</td>
<td>High Peak Borough Council (837) &amp; Derbyshire Dales DC (234)</td>
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<td>Calver Parish Council (340)</td>
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<td>Cheshire County Council</td>
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<td>Council for National Parks (1199)</td>
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<td>Home Builders’ Federation (1210)</td>
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<td>National Trust (1206)</td>
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<td>Friends of the Peak District (1201)</td>
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<td>Highways Agency (1190)</td>
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<td>Country Land &amp; Business Association (1137)</td>
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<td>Litton Properties (1127) (Nathaniel Lichfield &amp; Partners)</td>
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<tr>
<td>20</td>
<td>Various clients (755-762, 847, 874) (Pegasus Planning Group)</td>
</tr>
</tbody>
</table>


(i) Are the monitoring arrangements, including the machinery for monitoring, adequate?

(ii) What is the relationship between monitoring and plan preparation (PPS11 1-5)

(iii) Should the Implementation Framework (Appendix 1) be part of the formal RSS?

Participants Matter 13

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<td>3 seats for all the District/Borough Authorities (hot seating will be required)</td>
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<td>Environment Agency (1231)</td>
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<td>Highways Agency (1190)</td>
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<td>Home Builders’ Federation (1210)</td>
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<td>East Midlands Environment Link (780)/Campaign to Protect Rural England EM (781) (hot seating will be required)</td>
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<td>Natural England (878)</td>
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</table>
Matter 14. Milton Keynes and South Midlands Sub Region - Northamptonshire Implementation Area (2000 words maximum)

(i) Are the proposals in the Draft Plan for rolling forward the housing figures to 2026 for the districts within the North Northamptonshire HMA soundly based?

(ii) Are the proposed housing figures for the Northampton Implementation Area soundly based?

Participants Matter 14

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<td>Environment Agency (1231)/Anglian Water Services (110)</td>
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<td>Natural England (878)</td>
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<td>Bee Bee Developments Ltd (882) (Gerald Eve)/Church Commissioners (1273) (DLP) (hot seating will be required)</td>
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<td>Wootton SDA Consortium (863) (Woolf Bond Planning/Ensign Group (874) (Pegasus Planning Group) (hot seating will be required)</td>
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Matter 15. Plenary Session

The Panel will revisit any areas where people’s interests may have been prejudiced at subsequent sessions or which the Panel wish to revisit. The Panel will issue invitations but participants who wish to revisit any matters should inform the Panel as soon as possible before Matter 15.
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## PLANNING POLICY GUIDANCE/STATEMENTS

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<td>PPG4: Industrial, Commercial Development and Small Firms, 1992 Planning Policy Guidance 4</td>
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<td>PP7</td>
<td>PPS7: Sustainable Development in Rural Areas, 2004 Planning Policy Statement 7</td>
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<td>PP10a</td>
<td>PPS10: Planning for Sustainable Waste Management, 2005 Planning Policy Statement 10</td>
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<td>PP12a</td>
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<td>PPG15: Planning and the Historic Environment, 1994 (See also Circulars 01/2001 and 09/2005) Planning Policy Guidance 15</td>
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<td>PP16</td>
<td>PPG16: Archaeology and Planning, 1990 Planning Policy Guidance 16</td>
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<td>PP18</td>
<td>PPG18: Enforcing Planning Control, 1991 Planning Policy Guidance 18</td>
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### MINERAL PLANNING GUIDANCE

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### ECONOMY

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<td>Smart Growth: The Midlands Way – Advantage West Midlands/EMDA</td>
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<td>ECO7</td>
<td>RSS Evidence Base: Future Employment Prospects for the East Midlands – EMDA/EMRA</td>
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<td>ECO10</td>
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<td>Nottingham City Region Employment Land Study – January 2007 Roger Tym &amp; Partners</td>
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<td>East Midlands Northern Sub-Region Employment Land Review – Brief</td>
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<td>ECO18</td>
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<td>North Northamptonshire – Economic and Employment Strategy – Volterra Consulting; December 2006</td>
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<td>Response to North Northamptonshire CSS – Economic and Employment Strategy – Volterra Consulting Ltd; March 2007</td>
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### ENERGY

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<td>Small-Scale Hydroelectric Generation in the UK, ETSU, 1989</td>
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<td>The East Midlands Energy Challenge: East Midlands Regional Energy Strategy</td>
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### ENVIRONMENT

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<td>Planning For the Protection of European Sites: Appropriate Assessment-Guidance for Regional Spatial Strategies and Local Development Documents - Amendment. DCLG, August 2006</td>
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| ENV10 | Planning Protection of European Sites: Appropriate Assessment, DCLG, August 2006  
Planning for the Protection of European Sites: Appropriate Assessment |
| ENV11 | The Conservation (Natural Habitats &C) (Amendment Regulations) 2006 [SI No 2716]  
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| ENV12 | North West Green Infrastructure Guide (draft) prepared by the North West Green Infrastructure Think Tank |
| ENV13 | Green Infrastructure for the East Midlands: A public benefit mapping project, final report, EMRA July 2006  
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| ENV14 | East Midlands Regional Flood Risk Appraisal, EMRA July 2006  
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| ENV16 | Regional Environment Strategy: Part 2 – Actions for the East Midlands Environment, EMRA August 2003  
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| ENV19 | Nottingham-Derby Green Belt Review – Lynette Hughes (NCC) & Steve Buffery (DCC) August 2006 |
| ENV20 | RSS8 Housing Options Appraisal: Water Resource Implications – Environment Agency Paper |
| ENV21 | RSS8 Housing Options Appraisal: Water Quality Implications – Environment Agency Paper |
| ENV23 | Habitats Regulations Assessment of the Draft East Midlands Regional Plan Screening Report, January 2007 for EMRA by Land Use Consultants |
| ENV24 | The Historic Environment: A Force for our Future dcms December 2001  
| ENV27 | Habitats Regulations Assessment of the Draft East Midlands Regional Plan Draft Final Report April 2007 (LUC for EMRA)  
| ENV28 | Regional Trajectories for Carbon Emissions March 2007 Best Foot Forward for EMRA  
| ENV29 | Boston Borough Council Strategic Flood Risk Assessment Final Report November 2002 Bullen Consultants |
| ENV30 | Transport Strategy for Boston 2006 to 2021 and beyond December |
| ENV31 | 2006 LCC Technical Services in Partnership with Jacobs |
| ENV32 | Boston Borough Council Population Increase and Housing Completions 1981-2005 |
| ENV33 | Appendix 2 What is the Accessible Natural Greenspace Standards Model – Natural England |
| ENV36 | Tidal Flood Risk Issues Along the Lincolnshire Coast – Environment Agency April 2007 |
| ENV37 | Hidden Infrastructure. The Pressures on Environmental Infrastructure, Environment Agency, 2007 http://publications.environment-agency.gov.uk/epages/eapublications.storefront/4623681e00d9e146273fc0a802960669/Product/View/GEHO0307BMCD82DE2DE |
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| ENV52 | Strategic sustainability assessment of the Nottingham – Derby green belt – Baker Report 1999 |
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| ENV57 | Environmental Capacity Study for the Saltaire World Heritage Site, Atkins, 2006 |
| ENV58 | Environmental Capacity and the Historic Environment (draft), English Heritage 2007 |
| ENV60 | Northamptonshire’s Environmental Character and Green Infrastructure Suite [www.rnrp.org] |
| ENV61 | Lincolnshire Coastal Grazing Marshes project leaflet |
| ENV62 | Nottinghamshire Green Belt CPRE (Nottinghamshire) |
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| ENV72 | Green Infrastructure Strategy, Cambridgeshire Horizons http://www.cambridgeshirehorizons.co.uk/Document_links_det.asp?id=3433 |
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| ENV79 | Habitat Regulations (Conservation (Natural Habitats &c.) Regulations 1994, as amended 2007) http://www.jncc.gov.uk/page-1379 |
| ENV80 | The Real Choice – How local foods can survive the supermarket onslaught – A report by Caroline Cranbrook and CPRE – June 2006 |
| ENV82 | Brownfield Strategy Policy Consultation Workshop Discussion paper Policy issues and outline proposals Wednesday 13 December 2006 – English Partnerships |
| ENV83 | Explanatory Memorandum to the Environmental Noise (England) Regulation 2006 - DEFRA |

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<th>GEN2</th>
<th>Planning: Delivering a Fundamental Change, DLTR, December</th>
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<tr>
<td>GEN6</td>
<td>The Planning System: General Principles, ODPM, February 2005 (This document includes advice and information about the operation of the planning system that had previously been included in PPG1, updated to take account of the Planning and Compulsory Purchase Act 2004) <a href="http://www.communities.gov.uk">www.communities.gov.uk</a></td>
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<td>Regional Futures: England’s Regions in 2030, Executive Summary – January 2005</td>
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<td>Good Practice Guide on Planning for Tourism, DCLG (2006), which replaced PPG21</td>
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**HEALTH**

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<td>Identification of a Replacement Housing Provision Figure for the Northamptonshire Implementation Area – Final Report, November 2006 – Baker Associates</td>
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<td>Household Projections Background Note: Regional Plan “Options for Changes” – paper trend-based household projections:2001-2026, October 2005 – EMRA</td>
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<td>HOU22</td>
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<td>Housing Policy Justification Paper, Final Version – EMRA</td>
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<td>Background information on the Housing Market in the East Midlands,</td>
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Report of the examination in public of draft regional spatial strategy for the East Midlands
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<td>HOU29</td>
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<td>Nottingham Local Plan review: Justification for the housing figures in the revised deposit draft</td>
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<td>HOU41</td>
<td>Guidance on producing housing trajectories - DCLG</td>
</tr>
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<td>HOU42</td>
<td>Letter from Henry Cleary, DCLG to Guy Wisbey, Three Cities Growth Point Co-ordinator 4 April 2007</td>
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<td>HOU43</td>
<td>Updated Appendix 2 With HMA Housing Trajectories (EMRA based on local authority data) <a href="http://www.emra.gov.uk/files/hma_housing_trajectories_emra_based_on_ons_data.pdf">http://www.emra.gov.uk/files/hma_housing_trajectories_emra_based_on_ons_data.pdf</a></td>
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<td>Net Migration Flows between HMAs and other Regions (EMRA based on ONS data) <a href="http://www.emra.gov.uk/files/net_migration_flows_between_hmas_and_other_regions_emra_based_on_ons_data_.pdf">http://www.emra.gov.uk/files/net_migration_flows_between_hmas_and_other_regions_emra_based_on_ons_data_.pdf</a> <a href="http://www.emra.gov.uk/files/net_migration_flows_between_hmas.pdf">http://www.emra.gov.uk/files/net_migration_flows_between_hmas.pdf</a></td>
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<td>The Use of Projections in Preparing Regional and HMA Dwelling Provision (Richard Cooper, Notts CC presentation from 11/4/07 EiP preliminary meeting)</td>
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<tr>
<td>HOU46</td>
<td>Housing Audit: CABE, February 2007</td>
</tr>
<tr>
<td>Document ID</td>
<td>Description</td>
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<tr>
<td>-------------</td>
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</tr>
<tr>
<td>HOU47</td>
<td>The Contribution of Migration Flows to Demographic change in the East Midlands – emda March 2007</td>
</tr>
<tr>
<td>HOU49</td>
<td>Housing audit – Assessing the design quality of new housing in the East Midlands, West Midlands and the South West – CABE</td>
</tr>
<tr>
<td>HOU50</td>
<td>Leicester Principal Urban Area Housing Land Availability Assessment April 2007 Roger Tym and Partners for Leicester City Council and Leicestershire County Council <a href="http://www.leics.gov.uk/east_midlands_regional_plan__rss8__review.htm">http://www.leics.gov.uk/east_midlands_regional_plan__rss8__review.htm</a></td>
</tr>
<tr>
<td>HOU51</td>
<td>City Flight Migration Patterns in the East Midlands Mike Coombes, Tony Champion and Simon Raybould, CURDS (Centre for Urban and Regional Development Studies), Newcastle University with Tim Brown of the CCHR (Centre for Comparative Housing Research), De Montfort University.</td>
</tr>
<tr>
<td>HOU52</td>
<td>Examination of progress on Gypsy and Traveller Accommodation Assessments in the East Midlands region</td>
</tr>
<tr>
<td>HOU53</td>
<td>Masterplan for a Southeast Leicester Sustainable Urban Extension (Proposed by the Co-operative Group)</td>
</tr>
<tr>
<td>HOU57</td>
<td>Study into the Identification and Use of Local Housing Market Areas for the Development of the Regional Spatial Strategy (ECOTEC Report) – October 2006 (See attached PDF)</td>
</tr>
<tr>
<td>HOU58</td>
<td>Meeting the local need for affordable housing in the Peak District National Park – Supplementary Planning Guidance <a href="http://www.peakdistrict.gov.uk/index/pubs/spg-housing.htm">http://www.peakdistrict.gov.uk/index/pubs/spg-housing.htm</a></td>
</tr>
<tr>
<td>HOU59</td>
<td>Royal Town Planning Institute Award for policy approach ongoing process and practice for Affordable Housing in the Peak District National Park</td>
</tr>
<tr>
<td>HOU60</td>
<td>Peak District National Park Authority Annual Housing Report 2 <a href="http://www.peakdistrict.gov.uk/index/pubs/housing.htm">http://www.peakdistrict.gov.uk/index/pubs/housing.htm</a></td>
</tr>
<tr>
<td>HOU64</td>
<td>Household Estimates/Projections 2004</td>
</tr>
<tr>
<td>HOU65</td>
<td>Extracts From section 106 agreement used in connection with Affordable Housing in the Peak District National Park</td>
</tr>
<tr>
<td>HOU66</td>
<td>Sustainability appraisal of draft East Midlands Regional Plan Supplementary Report Sustainability Implications of the development</td>
</tr>
<tr>
<td>Annex 4 – List of Core Documents</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td></td>
</tr>
<tr>
<td>Industry alternative Housing Scenarios Land Use Consultants for HBF &amp; Development Interests – April 2007</td>
<td></td>
</tr>
<tr>
<td>HOU67 The Provision and Condition of Local Authority Gypsy/Traveller Sites in England – ODPM</td>
<td></td>
</tr>
<tr>
<td>HOU68 Gypsy and Traveller Task Group on Site Provision and enforcement. Interim report to Ministers – DCLG</td>
<td></td>
</tr>
<tr>
<td>HOU69 Local Authority Gypsy/Traveller Sites in England – July 2003</td>
<td></td>
</tr>
<tr>
<td>HOU70 Draft Guidance on the Management of Gypsy and Traveller Sites – DCLG</td>
<td></td>
</tr>
<tr>
<td>HOU71 Planning for Gypsy and Traveller Caravan Sites Circular (ODPM 01/2006)</td>
<td></td>
</tr>
<tr>
<td>HOU72 Counting Gypsies &amp; Travellers: A Review of the Gypsy Caravan Count System DCLG</td>
<td></td>
</tr>
<tr>
<td>HOU73 Government Response to the ODPM Select Committee’s Report on Gypsy and Traveller Sites – DCLG</td>
<td></td>
</tr>
<tr>
<td>HOU74 Affordability Matters NHPAU – June 2007</td>
<td></td>
</tr>
<tr>
<td>HOU75 New Growth Points – letter from Richard McCarthy to Rodney Green, Chief Executive, Leicester City Council</td>
<td></td>
</tr>
</tbody>
</table>

### MINERALS & WASTE

| MW4 Waste Planning Guidance for the East Midlands Regional Assembly, August 2006 – SLR Consulting Ltd |
| MW6 Does not exist |
| MW7 Proposed re-draft of Waste Topic Section 3 - GOEM |
| MW8 Joint Ministerial Statement by Ben Bradshaw, the Parliamentary Under Secretary for Local Environment, and Yvette Cooper, the Minister for Housing and Planning, on Sustainable Waste Management |
| MW9 Waste Strategy 2000 England and Wales Part 1 Chapter 4 Delivering Change |

### OTHER REGIONS

| OREG4  | A Clear Vision for the South East: The South East Plan, March 2006  
| OREG7  | East of England Draft Plan, December 2004  
| OREG9  | The North West Plan Submitted Draft Regional Spatial Strategy for the North West, January 2006  
| OREG10 | RPG13: Current RSS for the North West, March 2003  
| OREG12 | Phase 2 Revision of the West Midlands RSS Spatial Options Consultation Document – WMRA  
| OREG14 | West Midlands Regional Spatial Strategy – Phase Two Revision – Spatial Options Representations by South Derbyshire District Council February 2007  
| OREG15 | Think Globally Act Locally Climate Change Strategy The Woking model:  
| OREG17 | Report of the Panel, MKSM Sub-Regional Study  
| OREG18 | West Midlands RSS  
| OREG19 | An Ageing Population – Impacts for the North West  
| OREG20 | Creating Sustainable Communities in the North West – ODPM January 2005  

**REGIONAL**

| REG1  | Draft East Midlands Regional Plan, September 2006  
| REG2  | Regional Spatial Strategy for the East Midlands (RSS8) March 2005  
| REG3  | Schedule for the proposed replacement of policies within existing Structure Plans. September 2006  
| REG4  | Draft East Midlands Regional Plan – Consultation Launch Presentation, Sept 2006  
| REG5  | Proposals for a review of the East Midlands Regional Plan to 2026, April 2005  
| REG6  | East Midlands Regional Plan to 2026: It’s your future, 2005  
| REG7  | Regional Plan Draft Review Project Plan Presentation, April 2005  
| REG8  | Summary of comments made on Proposals for a Review of the East Midlands Regional Plan to 2026: Draft Project Plan &  

---

Annex 4 – List of Core Documents 255
<table>
<thead>
<tr>
<th>REG</th>
<th>Document Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>REG9</td>
<td>Summer 2006: Get Involved event report – East Midlands Planning Aid Service</td>
</tr>
<tr>
<td>REG11</td>
<td>Community Involvement Scoping Study: Core Report Recommendations, Executive Summary, January 2005 – Phillips Planning Services for EMRA</td>
</tr>
<tr>
<td>REG12</td>
<td>Community Involvement Scoping Study: Core Report, January 2005 – Phillips Planning Services for EMRA</td>
</tr>
<tr>
<td>REG14</td>
<td>East Midlands Scoping Phase: responses to consultation, August 2005 – Land Use Consultants</td>
</tr>
<tr>
<td>REG15</td>
<td>Draft Service Level Agreements with Section 4 (4) Authorities, October 2005 - EMRA</td>
</tr>
<tr>
<td>REG16</td>
<td>Review of the East Midlands Regional Plan to 2026: “Options for Change” Consultation, October 2005 - EMRA</td>
</tr>
<tr>
<td>REG18</td>
<td>Review of East Midlands Regional Plan to 2026: “Options for Change” Summary, October 2005</td>
</tr>
<tr>
<td>REG19</td>
<td>“Options for Change”: Revisions to Housing Options Maps, December 2005</td>
</tr>
<tr>
<td>REG20</td>
<td>“Options for Change” Presentation, October 2005</td>
</tr>
<tr>
<td>REG22</td>
<td>Review of East Midlands Regional Plan: Proposed Alteration to the Review Project Plan (MKSM) (May 2006-July 2006), Summary of Comments received</td>
</tr>
<tr>
<td>REG24</td>
<td>Responses to the Employment Land Consultation following Spring Seminar</td>
</tr>
<tr>
<td>REG27</td>
<td>Environmental Infrastructure Seminar, May 2006 – Report of Seminar discussions</td>
</tr>
<tr>
<td>REG30</td>
<td>Regional Plan Review: Spring Seminar – Retail Issues and Town Centres, March 2005</td>
</tr>
<tr>
<td>REG33</td>
<td>Northern Sub-Regional Strategy: Stakeholder Seminar, June 2006</td>
</tr>
<tr>
<td>REG34</td>
<td>Northern Sub-Regional Strategy: Progress Report 1, April 2006</td>
</tr>
<tr>
<td>REG35</td>
<td>Three Cities Sub-Regional Strategy Seminar: List of delegates, June 2006</td>
</tr>
<tr>
<td>REG33</td>
<td>Northern Sub-Regional Strategy: Stakeholder Seminar, June 2006</td>
</tr>
<tr>
<td>REG34</td>
<td>Northern Sub-Regional Strategy: Progress Report 1, April 2006</td>
</tr>
<tr>
<td>REG35</td>
<td>Three Cities Sub-Regional Strategy Seminar: List of delegates, June 2006</td>
</tr>
<tr>
<td>REG36</td>
<td>Three Cities Sub-Regional Strategy: Spring Seminar, June 2006</td>
</tr>
<tr>
<td>------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>REG37</td>
<td>Lincoln Area Strategic Planning: Sub-Regional Spatial Strategy Key Stakeholders Workshop, June 2006</td>
</tr>
<tr>
<td>REG38</td>
<td>Study: Regional Spatial Strategy – Reflecting Cultural Priorities, discussion, May 2006</td>
</tr>
<tr>
<td>REG40</td>
<td>HMA Event (Housing Markets) February 2005</td>
</tr>
<tr>
<td>REG41</td>
<td>Workshop: Get Involved – Input on the Regional Plan “Options for Change”</td>
</tr>
<tr>
<td>REG42</td>
<td>Three Cities Growth Point Bid March 2006</td>
</tr>
<tr>
<td>REG43</td>
<td>Lincoln/Grantham Growth Point Bid</td>
</tr>
<tr>
<td>REG44</td>
<td>Newark Growth Point Bid + Letter from Newark &amp; Sherwood DC (February 2007), letter from Henry Cleary (July 2006)</td>
</tr>
<tr>
<td>REG45</td>
<td>EMRA: Regional Housing, Planning &amp; Transport Joint Board 18 May 2006 - an Update on the Review of the Regional Plan</td>
</tr>
<tr>
<td>REG49</td>
<td>Northern Sub-Regional Strategy: Progress Report 2, June 2006</td>
</tr>
<tr>
<td>REG50</td>
<td>Northern Sub-Regional Strategy: Progress Report 3, August 2006</td>
</tr>
<tr>
<td>REG54</td>
<td>Chapter 1 Regional Profiles/Regional Trends – Statistical regions of the United Kingdom 2006</td>
</tr>
<tr>
<td>REG55</td>
<td>Employment Land Review Update – timetable provided by EMRA by request during the Examination</td>
</tr>
</tbody>
</table>

**RESPONDENT DOCUMENTS**

<table>
<thead>
<tr>
<th>RES1</th>
<th>Airfield Farm, Market Harborough: Response to Harborough Core Strategy – Preferred Options, June 2006 – Andrew Martin Associates/Hallam Land Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>RES2</td>
<td>Garendon, Loughborough: Response to Charnwood Core Strategy: Preferred Options, March 2006 – Andrew Martin Associates/William Davis &amp; Persimmon</td>
</tr>
<tr>
<td>RES3</td>
<td>Response to Newark and Sherwood Core Strategy: Preferred Options, December 2006 – NSK Europe Limited – Andrew Martin Associates/BSP Consulting</td>
</tr>
<tr>
<td>RES4</td>
<td>Wootton SDA: A sustainable urban extension for Northampton, November 2006 – LDA Design [www lda-design.co.uk](<a href="http://www">http://www</a> lda-design.co.uk)</td>
</tr>
<tr>
<td>RES6</td>
<td>Money Hill, Ashby-de-la-Zouch: Appendix 1 – Masterplan; Appendix 2 – Transport Strategy and Review; Appendix 3 – The economy of Ashby-de-la-Zouch (<a href="http://www.emda.org.uk/documents/doclist.asp?action=display&amp;filevar=235">Appendices accompany response</a>)</td>
</tr>
<tr>
<td>Document Respondent 754</td>
<td>Money Hill Consortium</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>RES7</td>
<td>Stamford 3000: A discussion document on the future of the town centre of Stamford, July 2006 – for Stamford Chamber of Trade and Commerce (Respondent 608) by Adrian Fisher Design. Also, Stamford Eastern Relief Road: Stamford Traffic and Highway Study – Leaflet &amp; CD ROM – for Stamford Chamber of Trade and Commerce by JMP Consulting</td>
</tr>
<tr>
<td>RES8</td>
<td>Landscape Character Assessment of Clifton Pasture and Barton Moor, Barton in Fabis Parish Council</td>
</tr>
<tr>
<td>RES9</td>
<td>East Midlands Airport Masterplan, December 2006 <a href="http://www.eastmidlandsairport.com">www.eastmidlandsairport.com</a></td>
</tr>
<tr>
<td>RES10</td>
<td>Taylor Woodrow Developments Limited &amp; Havenwood Construction Ltd (Resp 1106) in relation to the omission of a proposal called Gamston Gateway, to the Southeast of Nottingham. Addendum to sustainability appraisal of the Draft East Midlands Regional Plan – Addleshaw Goddard/Graham Warren Partnership</td>
</tr>
<tr>
<td>RES11</td>
<td>Lincoln Western Growth Corridor – Evaluation in Response of New Planning Policy, Taylor Woodrow Developments Limited/CBRE</td>
</tr>
<tr>
<td>RES15</td>
<td>Peak District National Park Authority Statement for Matter 8 at the East Midlands Regional Plan EIP</td>
</tr>
<tr>
<td>RES16</td>
<td>Peak District National Park Authority letter to Government Office for the East Midlands regarding the relationship between Local Development Documents, The National Park Management Plan and Community Strategies</td>
</tr>
<tr>
<td>RES17</td>
<td>A Response To South Derbyshire District Woodville to Swadlincote Town Centre Area Action Plan – Issues and Options – March 2007 – Commercial Estates Group</td>
</tr>
<tr>
<td>RES18</td>
<td>Oadby and Wigston Urban Housing Potential Study, November 2003 – Baker Associates</td>
</tr>
<tr>
<td>RES19</td>
<td>Oadby and Wigston Borough Council Housing Needs Assessment</td>
</tr>
<tr>
<td>RES21</td>
<td>Oadby and Wigston Green Wedge Management Strategy, 2004 – Leicestershire County Council</td>
</tr>
<tr>
<td>RES22</td>
<td>Stoughton, Oadby and Thurnby Green Wedge Management Strategy, 2006</td>
</tr>
<tr>
<td>RES24</td>
<td>Nottingham-Derby Green Belt Review – Rushcliffe Borough Note of Meeting 18 January 2006</td>
</tr>
<tr>
<td>RES25</td>
<td>E-mail 19 October 2006 from Lynette Hughes, Nottinghamshire County Council to Stuart Bannerman re Nottingham-Derby Green Belt Review</td>
</tr>
<tr>
<td>RES26</td>
<td>A 50 year vision for wetlands – a future for England’s water and wetland biodiversity – Natural England, the Environment Agency, RSPB</td>
</tr>
<tr>
<td>RES27</td>
<td>Oadby &amp; Wigston Borough Housing Needs Survey Final Report 2005</td>
</tr>
<tr>
<td>RES32</td>
<td>East Midlands Regional Spatial Strategy Examination In Public - Background Note For The Panel 3 Cities &amp; 3 Counties New Growth Point – 18 April 2007 Guy Wisbey, Project Manager, 3 Cities &amp; 3 Counties Partnership for Growth</td>
</tr>
<tr>
<td>RES37</td>
<td>Lincoln ASDA report</td>
</tr>
<tr>
<td>RES38</td>
<td>Strategic Review Nottinghamshire-Derby Green Belt, April 2007 - David Wilson Homes and Bovis Homes</td>
</tr>
<tr>
<td>RES39</td>
<td>3 Cities and 3 Counties Partnership Group, Principal Urban Areas Housing Land Availability Assessments: Brief to Consultants, November 2006, Notts JSP EiP Panel Report – Notts CC/Nottm CC</td>
</tr>
<tr>
<td>RES40</td>
<td>Additional Document from Respondent 1132 Representation by Bovis Homes Limited – December 2006</td>
</tr>
<tr>
<td>RES41</td>
<td>Additional Document from Respondent 1113 Response on behalf of the Crown Estate – December 2006</td>
</tr>
<tr>
<td>RES42-48</td>
<td>Do not exist</td>
</tr>
<tr>
<td>RES52</td>
<td>Roger Tym &amp; Partners et al, Nottingham City Region Employment Land Study, February 2007</td>
</tr>
<tr>
<td>-------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>RES56</td>
<td>Housing Requirements 2001 – 2026 Impact of 2004 Household Projections – Pegasus Planning Group</td>
</tr>
<tr>
<td>RES57</td>
<td>Emda Technical Report No. 3: Housing Projections</td>
</tr>
<tr>
<td>RES58</td>
<td>City of Lincoln Retail and Town Centre Study: Report 2007</td>
</tr>
<tr>
<td>RES59</td>
<td>Sustainability Appraisal of Proposed Housing Provision – Pegasus Planning Group – March 2007</td>
</tr>
<tr>
<td>RES65</td>
<td>Regional Employment Land Priorities Study 2003 - Innes England and Sinclair Knight Merz for EMDA <a href="http://www.emda.org.uk/uploaddocuments/relpreportmerged.doc">http://www.emda.org.uk/uploaddocuments/relpreportmerged.doc</a></td>
</tr>
<tr>
<td>RES67</td>
<td>Newark and Sherwood Urban Capacity Study Consultation Draft 2002 - Newark and Sherwood District Council <a href="http://www.newark-sherwooddc.gov.uk/ppimageupload/Image13936.PDF">http://www.newark-sherwooddc.gov.uk/ppimageupload/Image13936.PDF</a></td>
</tr>
<tr>
<td>RES69</td>
<td>Supporting Evidence - Commercial Estates Group, NSK (Europe) Limited, William Davis / Hallam Land Management, William Davis / Persimmon Homes Limited Andrew Martin Associates</td>
</tr>
<tr>
<td>RES71</td>
<td>Shelter's Building Hope <a href="http://england.shelter.org.uk/policy/policy-825.cfm/ct/1/sb/12/pg/2/plitem/188">http://england.shelter.org.uk/policy/policy-825.cfm/ct/1/sb/12/pg/2/plitem/188</a></td>
</tr>
<tr>
<td>RES73</td>
<td>Chance of a Lifetime - Shelter</td>
</tr>
<tr>
<td>RES74</td>
<td>Against the Odds - Shelter</td>
</tr>
<tr>
<td>RES76</td>
<td>The Countryside Agency, Bingham Market Town Initiative Action Plan, June 2004</td>
</tr>
<tr>
<td>RES77</td>
<td>RES78</td>
</tr>
<tr>
<td>-------</td>
<td>-------</td>
</tr>
<tr>
<td>RES98</td>
<td>Running on empty- Water in the South East</td>
</tr>
<tr>
<td>RES99</td>
<td>Tackling climate change in England’s regions – the role of regional spatial strategies, Friends of the Earth, October 2005:</td>
</tr>
<tr>
<td>RES100</td>
<td>Friends of the Earth submission to the Energy Review April 2006</td>
</tr>
<tr>
<td>RES102</td>
<td>WWF One Million Sustainable Homes</td>
</tr>
<tr>
<td>RES103</td>
<td>Growth Scenarios for EU and UK Aviation Contradictions with climate policy – Tyndall Centre for Friends of the Earth – April 2005</td>
</tr>
<tr>
<td>RES107</td>
<td>Lincoln Housing Capacity Study Update Report 2004 – City of Lincoln Council</td>
</tr>
<tr>
<td>RES108</td>
<td>A57/A628 Mottram-Tintwistle Bypass – Natural England’s response to the Highway’s Agency</td>
</tr>
<tr>
<td>RES109</td>
<td>Additional Planning Information on behalf of English Partnerships April 2007 David Lock Associates</td>
</tr>
<tr>
<td>RES110</td>
<td>Proposed PUA Extension to West Leicester – plan provided by Hallam Land Management</td>
</tr>
<tr>
<td>RES111</td>
<td>Minerals Planning Factsheet, April 2006 – Lafarge Cement UK</td>
</tr>
<tr>
<td>RES112</td>
<td>Braunstone Town Parish Plan</td>
</tr>
<tr>
<td>RES113</td>
<td>Transport Technical Seminar – Presentation by Andrew Pritchard, EMRA 12 April 2007</td>
</tr>
<tr>
<td>RES114</td>
<td>Employment Land Provision Study – Presentation at Economy Technical Seminar EMRA 12 April 2007</td>
</tr>
<tr>
<td>RES115</td>
<td>Economy Technical Seminar – Presentation by Andrew Pritchard, EMRA 12 April 2007</td>
</tr>
<tr>
<td>RES116</td>
<td>Transport Technical Seminar Ptolemy Model - Presentation by Highways Agency</td>
</tr>
<tr>
<td>RES117</td>
<td>Housing Technical Seminar – presentation by Andrew Pritchard EMRA 11 April 2007</td>
</tr>
<tr>
<td>RES118</td>
<td>Housing Technical Seminar CLG Household Projections – presentation by Bob Garland, HMPA, Analytical Services, Communities &amp; Local Government 11 April 2007</td>
</tr>
<tr>
<td>RES119</td>
<td>The Use of Projections in Preparing Regional and HMA Dwelling Provision – presentation by Richard Cooper 11 April 2007</td>
</tr>
<tr>
<td>RES120</td>
<td>An Approach to Determining Affordable Housing Need for the East</td>
</tr>
<tr>
<td>RES121</td>
<td>Long-term growth options for Northampton proposal for strategic development at junction 15A “Weston Hampton” DLP Consultants November 2006</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>RES122</td>
<td>Jesus College Respondent 771, Statement on Matter 11A – April 2007</td>
</tr>
<tr>
<td>RES123</td>
<td>Weston Hampton Meeting the Challenges of Strategic Development – DLP Planning Consultants</td>
</tr>
<tr>
<td>RES124</td>
<td>Additional Library Material In Respect Of The DCLG 2004 Household Projections For The EiP For The RSS For The South West On Behalf Of Hallam Land Management Ltd</td>
</tr>
<tr>
<td>RES125</td>
<td>Defining Local Housing Markets – GVA Grimley March 2007</td>
</tr>
<tr>
<td>RES127</td>
<td>Burton/Swadlincote/Coalville (Matter 9E) Supplementary information regarding sustainability appraisal – respondent 534</td>
</tr>
<tr>
<td>RES128</td>
<td>Suggested changes to RSS diagrams – respondent 534</td>
</tr>
<tr>
<td>RES131</td>
<td>RTPI Planning Awards 2005 Locally needed affordable housing in the Peak District National Park – Summary</td>
</tr>
<tr>
<td>RES132</td>
<td>A57/A628 Mottram - Tintwistle Bypass and A628/A616 Route Restraint Measures outline statement – Highways Agency</td>
</tr>
<tr>
<td>RES133</td>
<td>Further Representations On The Draft East Midlands Regional Plan With Specific Reference To Leicestershire County Council’s Response To The Consultation, Regarding The Scale And Location Of Development In Loughborough - Peter Brett Associates, Garendon, Loughborough</td>
</tr>
<tr>
<td>RES136</td>
<td>ASDA Study re-evaluation in response to new central government policy (submitted by Phil Hughes, Lincs CC)</td>
</tr>
<tr>
<td>RES138</td>
<td>Lincoln Policy Area Alternative Strategic Development Areas Study Supplementary Sectoral Assessment May 2006 Annex A (submitted by Phil Hughes, Lincs CC) plus other documents:- Environment Agency rebuttal; Special Meeting of Lincoln Area Strategic Planning Joint Advisory Committee; Endorsement of Report</td>
</tr>
<tr>
<td>RES139</td>
<td>Correspondence with DCLG (2 letters) (submitted by Phil Hughes, Lincs CC)</td>
</tr>
<tr>
<td>RES140</td>
<td>Joint authorities Rebuttal to EA Appraisal of ASDA (submitted by Phil Hughes, Lincs CC)</td>
</tr>
<tr>
<td>RES143</td>
<td>CPRE response to the DfT Regional funding allocations consultation October 2006</td>
</tr>
<tr>
<td>RES144</td>
<td>Valuing our Environment, Summary The National Trust 2001 (submitted by CPRE)</td>
</tr>
<tr>
<td>RES152</td>
<td>Burtoft a new sustainable community – representation to the draft East Midlands Regional Plan December 2006 – respondent 1119</td>
</tr>
<tr>
<td>RES154</td>
<td>Housing Needs Study/Balancing Housing Markets, Unconstrained Growth Study – submitted by Boston Borough Council June 2007</td>
</tr>
<tr>
<td>RES155</td>
<td>Commission for Rural Communities, A8 Migrant Workers in rural areas, Briefing Paper submitted by Boston Borough Council June 2007</td>
</tr>
<tr>
<td>RES156</td>
<td>Agricultural Land around Nottingham – submitted by Richard Cooper Nottinghamshire City Council July 2008</td>
</tr>
<tr>
<td>RES157</td>
<td>Housing Delivery by Type in Peak District National Park: April 1991 – March 2006 (excluding agricultural dwellings) – submitted by Peak District National Park Authority July 2007</td>
</tr>
<tr>
<td>RES158</td>
<td>Ramsar Citation for the Upper Nene Valley Gravel Pits – submitted by Natural England June 2007</td>
</tr>
<tr>
<td>RES159</td>
<td>Special Protection Area Citation for the Upper Nene Valley Gravel Pits – submitted by Natural England June 2007</td>
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## RETAIL

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<tr>
<th>RET1</th>
<th>Regional Town Centres Study for the East Midlands, Final Report March 2003  <a href="http://www.piedaconsulting.co.uk">www.piedaconsulting.co.uk</a></th>
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<tr>
<td>RET3</td>
<td>Retail and Town Centres: Choices for the Future – a summary of consultations - EMRA</td>
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<td>RET4</td>
<td>Revised Retail Capacity Assessment, Technical Paper June 2005 – EMRA</td>
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## RURAL

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<td>RUR5</td>
<td>East Midlands Affairs Rural Action Plan  <a href="http://www.ruralaffairs.org.uk">www.ruralaffairs.org.uk</a></td>
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<td>RUR7</td>
<td>People make the difference – a good practice guide for involving residents in rural generation – the Countryside Agency and the Housing corporation : June 2001  <a href="http://www.countryside.gov.uk">www.countryside.gov.uk</a></td>
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## SPORT


## SUSTAINABILITY

<table>
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<tr>
<td>SUS4</td>
<td>Delivering Sustainable Communities in the East Midlands: Embedding sustainable design in Local Development Frameworks – draft</td>
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<td>SUS5</td>
<td>Sustainability Appraisal of the Draft East Midlands Regional Plan,</td>
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<td>Document Number</td>
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<td>SUS14</td>
<td>East Midlands Regional Plan: Sustainability Appraisal – Scoping Report Aug 05</td>
</tr>
<tr>
<td>SUS15</td>
<td>Review of framework in response to comments on Scoping Report, August 2005</td>
</tr>
<tr>
<td>SUS17</td>
<td>Leicestershire Sustainable Urban Extensions Sustainability Appraisal April 2007</td>
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**TRANSPORT**

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<tr>
<th>Document Number</th>
<th>Title</th>
<th>Authors/Consultants</th>
<th>Date</th>
<th>Reference</th>
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<tr>
<td>TRA3</td>
<td>Regional Spatial Strategies: Guide to Producing Regional Transport</td>
<td>Department for Transport</td>
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<td>Annex 4 – List of Core Documents</td>
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</table>
| **TRA2** | Ports Policy Review, Department for Transport, May 2006  
| **TRA3** | Freight on Water: A New Prospectus, Freight Study Group, 2002  
| **TRA4** | European Transport Policy for 2010: Time to Decide, European Commission, 2002  
| **TRA5** | Managing Our Roads, Department for Transport, 2003  
| **TRA6** | National Travel Survey, Department for Transport, 2004  
| **TRA7** | Sustainable Distribution Fund: A Single Pot for Investments in England, Department for Transport February 2005  
| **TRA8** | Proposed Bypass Alignment and Development Access Glaston, Rutland – JMP Consulting  
[www.jmp.co.uk](http://www.jmp.co.uk) |
| **TRA9** | Developing Regional Transport Funding Priorities for the East Midlands, Final Report, January 2006 – Steer Davies Gleave for EMRA  
<p>| <strong>TRA10</strong> | Developing Regional Transport Funding Priorities for the East Midlands: Appendix A, Maps that have provided information for assessment (Scheme ID Numbers 1-35) – Steer Davies Gleave for EMRA |
| <strong>TRA11</strong> | Developing Regional Transport Funding Priorities for the East Midlands: Appendix B, Maps that have provided information for assessment (Scheme ID Numbers 36-81) – Steer Davies Gleave for EMRA |
| <strong>TRA12</strong> | Developing Regional Transport Funding Priorities for the East Midlands: Appendix C, Stage 1 Assessment results showing fit with Core Regional Objectives – Steer Davies Gleave for EMRA |
| <strong>TRA13</strong> | Smarter Choices: Influencing Travel Behaviour in the East Midlands, Final report May 2006 – EMRA |
| <strong>TRA14</strong> | Smarter Choices in the East Midlands: Influencing travel |</p>
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<th>Document Code</th>
<th>Description</th>
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<tr>
<td>TRA22</td>
<td>East Midlands Regional Freight Strategy, July 2005 – EMRA</td>
</tr>
<tr>
<td>TRA23</td>
<td>Note on Alternative Housing Tests undertaken as alternative to TEMPRO – Highways Agency</td>
</tr>
<tr>
<td>TRA24</td>
<td>Note on 2006 Housing Tests for East Midlands Regional Plan – Highways Agency</td>
</tr>
<tr>
<td>TRA26</td>
<td>Possible Rail Freight connection and interchange at Burnaston December 2006 – Severn Trent Water/Steer Davies Gleave</td>
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<td>TRA27</td>
<td>Appendix 5: A628 Proposed Alternatives – Natural England</td>
</tr>
<tr>
<td>TRA28</td>
<td>Assessment of Highways and Transportation Implications of Sustainable Urban Extensions at Selected Broad Locations in Leicestershire – Technical Report December 2006 Leicestershire County Council <a href="http://www.leics.gov.uk/east_midlands_regional_plan__rss8__review.htm">link</a></td>
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<tr>
<td>TRA29</td>
<td>Further Assessment of Highways and Transportation Implications of Sustainable Urban Extensions at Selected Broad Locations in Leicestershire - Technical Report April 2007 Leicestershire County Council <a href="http://www.leics.gov.uk/east_midlands_regional_plan__rss8__review.htm">link</a></td>
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<td>TRA30</td>
<td>Drakelow Park, South Derbyshire – Transport Strategy Report” prepared by David Tucker Associates on behalf of Roger Bullivant Ltd and Eon</td>
</tr>
<tr>
<td>TRA32</td>
<td>Commuting Flows in the East Midlands, Experian for East Midlands Development agency April 07</td>
</tr>
<tr>
<td>TRA33</td>
<td>Formal Objection by the Peak District National Park Authority to the A628 Bypass.</td>
</tr>
<tr>
<td>TRA34</td>
<td>West to East Midlands Multi-Modal Study&quot; prepared by Jacobs Consultancy on behalf of the Government Office for the East Midlands, August 2003 <a href="http://www.gos.gov.uk/497296/docs/221775/wmem">link</a></td>
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<td>TRA36</td>
<td>Burton to Swadlincote (A38-A444-A511) Regeneration Corridor Study&quot; prepared by Atkins on behalf of Staffordshire County Council et al <a href="http://www.staffordshire.gov.uk/transport/transportplanning/localtransportplan/LocalTransportPlan2.htm">link</a></td>
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<td>TRA37</td>
<td>Review of Provisional Second Local Transport Plans; East Midlands Transport Activists Roundtable (EMTAR); September 2005. Chapter 6 – Major Schemes</td>
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<td>TRA38</td>
<td>Travel To Work Areas 1998 plan – ONS 2003</td>
</tr>
<tr>
<td>TRA39</td>
<td>The Provision of Strategic Fail Freight Interchanges for the East Midlands – April 2007 Intermodality LLP</td>
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<tr>
<td>TRA40</td>
<td>South Pennines Integrated Transport Strategy (SPITS) <a href="http://www.spits.org.uk/">link</a></td>
</tr>
</tbody>
</table>
## EXAMINATION DOCUMENTS

| EXAM1 | Original representations to the Draft Regional Spatial Strategy (59 files, 1291 respondents) |
| EXAM2 | Draft List of Matters and Participants, February 2007 |
| EXAM3 | Panel Response to question at Preliminary Meeting, 28 February 2007, from Home Builders’ Federation Plus reply from HBF dated 5 March 2007 and e-mail from Panel Secretary, dated 7 March 2007 |
| EXAM4 | Selection of letters from the Thurmaston area; late representations not listed on database and not considered by Panel |
| EXAM5 | Minutes of the First Preliminary Meeting held on 28 February 2007 |
| EXAM6 | Statement by EMRA at First Preliminary Meeting (28 February) on further technical work |
| EXAM7 | Comments on Draft List of Matters and Participants (3 files) |
| EXAM8 | Matter 1 Participant Statements and Written Reps |
| EXAM9 | Matter 2A Participant Statements and Written Reps |
| EXAM9 | Matter 2B Participant Statements and Written Reps |
| EXAM9 | Matter 3 Participant Statements and Written Reps |
| EXAM10 | Matter 4A Participant Statements and Written Reps |
| EXAM10 | Matter 4B Participant Statements and Written Reps |
| EXAM10 | Matter 4C Participant Statements and Written Reps |
| EXAM11 | Matter 5A Participant Statements and Written Reps |
| EXAM11 | Matter 5B Participant Statements and Written Reps |
| EXAM11 | Matter 5C Participant Statements |
| EXAM12 | Matter 6A Participant Statements and Written Reps |
| EXAM12 | Matter 6B Participant Statements and Written Reps |
| EXAM12 | Matter 6C Participant Statements and Written Reps |
| EXAM13 | Matter 7A Participant Statements |
| EXAM13 | Matter 7B Participant Statements and Written Reps |
| EXAM13 | Matter 7C Participant Statements and Written Reps |
| EXAM14 | Matter 8 Participant Statements and Written Reps |
| EXAM15 | Matter 9 Participant Statements and Written Reps |
| EXAM15 | Matter 9A Participant Statements and Written Reps |
| EXAM15 | Matter 9B Participant Statements and Written Reps |
| EXAM15 | Matter 9C Participant Statements and Written Reps |
| EXAM15 | Matter 9D Participant Statements and Written Reps |
| EXAM15 | Matter 9E Participant Statements and Written Reps |
| EXAM16 | Matter 10 Participant Statements and Written Reps |
| EXAM16 | Matter 11A Participant Statements and Written Reps |
| EXAM16 | Matter 11B Participant Statements and Written Reps |
| EXAM16 | Matter 12 Participant Statements and Written Reps |
| EXAM16 | Matter 13 Participant Statements and Written Reps |
| EXAM17 | Matter 14 Participant Statements and Written Reps |
| EXAM17 | Matter 15 Participant Statements and Written Reps |
| EXAM18 | Advice Note regarding Flood Risk Mitigation Examples produced by Halcrow Group Limited July 2007 |
| EXAM19 | Responses to Additional Consultation on a Replacement Housing Provision Figure for the Northampton Implementation Area |
| EXAM20 | Preliminary Meetings, Seminars and Examination in Public Participant Attendance sheets |
| EXAM21 | Late response to consultation received 6 March 2007 |
| EXAM22 | Do not exist |
| EXAM36 | Parliamentary Question, 3 May 2007 Eric Pickles to ask the Secretary of State for Communities and Local Government for what policy reason PPS3 prevents LAs from using windfall sites to meet their housebuilding targets. GOEM |
| EXAM37 | Employment Land Review Update – Andrew Pritchard, EMRA – June 2007 |
| EXAM38 | Matter 9A Three Cities Sub Region – Nottingham Housing Market Area correspondence and papers relating to Nottingham Principal Urban Area Strategic Housing Land Availability Assessment June 2007 |
| EXAM39 | Opening Statement from the East Midlands Regional Assembly 22 May 2007 |
| EXAM40 | RSS8 East Midlands Plan Flood risk on the Lincolnshire Coast EA points for EiP following discussion with EMRA and GOEM on 12 June 07 – Environment Agency 14 June 07 |
| EXAM41 | Environment Agency note in response to a question from the Panel on 20/6/07 re cpo powers for flood management submitted 21/6/07 |
| EXAM42 | East Midlands RSS EiP Government Office Advice on Tranquility – GOEM 21/6/07 |
| EXAM43 | Statement on clarification of PPS22 from EiP Energy Debate – GOEM July 07 |
| EXAM44 | Joint Statement by the East Midlands Regional Assembly, the Government Office for the East Midlands and the Environment agency – A Way forward for the Lincolnshire Coast – July 07 |
| EXAM45 | Ptolemy: A Strategic land use and transport model for the Nottingham-Leicester-Derby area – An EiP Panel Briefing note for the Highways Agency, EMRA, emda, DfT and EMA |
| EXAM46 | Letter from Andrew Pritchard, EMRA 23 July 2007 to the Panel Secretary re Traffic Growth in the East Midlands – in response to a question by the Panel at the EiP on 19 July 2007 |
| EXAM47 | Responses to the Panel’s request for comments following the publication of the Housing Green Paper July 2007 |
| EXAM48 | Letter from the Panel dated 7 August to all 1287 respondents to close the Examination in Public |