

# EAST MIDLANDS REGIONAL PLAN

## HOUSING POLICY JUSTIFICATION PAPER



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## **PART 1**

### **District Housing Provision Figures (Policy 14) Justification**

#### **1. Introduction**

- 1.1 This Paper sets out the background information and factors which have been taken into account in considering the District housing provision figures. At the regional level, a distribution policy based on 'Urban Concentration and Regeneration' was agreed on the basis of comments received on the 'Options for Change' consultation and the results of the Sustainability Appraisal. The Department for Communities and Local Government (DCLG) household projections have been used as a starting point in accordance with Government guidance.
- 1.2 This forms the overall policy context for the strategic approach outlined for each Housing Market Area (HMA) grouping. The HMA benchmark figures were agreed by the Housing Planning and Transport Joint Board at their meeting on 16 May 2006.
- 1.3 Under the Service Level Agreement the Section 4(4) Authorities - the counties of Derbyshire, Leicestershire, Lincolnshire, Northamptonshire and Nottinghamshire, and the Unitary authorities of Derby, Leicester, Nottingham and Rutland together with the Peak District National Park Authority have carried out the work to determine the level of housing provision in each District within the Region.
- 1.4 Advice in Draft PPS3 indicates that housing need and demand are met within the sub-regional Housing Market Area in which they are generated, unless there is clear evidence that this is not possible. In testing the proposed HMA figures, a number of sources of information were considered, including Studies which have been commissioned to inform the Regional Plan Review and the Policy development process. The main Studies are listed in Appendix 2 and are available on the Regional Plan website: [www.emra.gov.uk/regionalplan](http://www.emra.gov.uk/regionalplan)
- 1.5 Together with the views and formal comments of District Councils and wider key partners the following factors have been considered where appropriate. Some of the factors have different weight in different HMAs.
- latest information on 'urban capacity' and dwelling supply;
  - emda's 'policy on' job growth projections;
  - the impact on existing and planned transport infrastructure;
  - water resources and water treatment capacity;
  - flood risk;
  - affordability and market conditions; and

- strategic issues relating to landscape, biodiversity and the historic environment including the impact on the Green Belt and other environmental designations.
- 1.6 There are sources of information, which are not available or only partially available at present. Further work will be carried out within the Region which will help inform the debate at the Examination in Public (EiP) including:
- updated information on urban capacity;
  - updated information on housing completions and planning permissions to 2006;
  - the results of Housing Market Assessments;
  - more detailed transport modelling of areas of search for development;
  - employment land information at a regional level in the Regional Employment Land Supply Study (RELS) and from County and District level employment land and premises studies;
  - the Sustainability Appraisal (SA) of the Regional Plan and the individual SAs for the Sub-Regional Strategies;
  - confirmation of Growth Point funding where appropriate.
- 1.7 Further technical papers setting out the background on the Housing Provision figures and what has been taken into account are available on the website at [www.emra.gov.uk/regionalplan](http://www.emra.gov.uk/regionalplan) These include:
- A Housing Technical Paper 'Background Information on Housing Provision and Household Projections'
  - Background information on the Sub-Regional Strategies

## **2. EASTERN SUB-AREA**

### **2.1 Central Lincolnshire HMA**

Proposed Annual Provision: 1,830 dwellings

#### **Justification of Policy Approach to HMA**

- 2.1.1 The strategic approach to the Central Lincolnshire HMA consists of:
- significantly strengthening the role of Lincoln as a Principal Urban Area (PUA) through urban intensification and planned and sustainable urban extensions;
  - supporting the regeneration of Gainsborough;
  - strengthening the local roles of Sleaford, Caistor and Market Rasen;
  - meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

- 2.1.2 The policy approach to this is mainly set out in the Lincoln Policy Area Sub-Regional Strategy (SRS), which does not, however, cover parts of North Kesteven and West Lindsey, the approach to which are set out below under each District.
- 2.1.3 The proposed level of provision of **1,830** dwellings per annum (dpa) meets the DCLG trend based projections in full, and is above current build rates and long-term migration trends. It is considered to be realistic, based on recent completions and the economic potential of the HMA, which has recently been boosted by the development of Lincoln University.
- 2.1.4 It is consistent with the Growth Point bid for the Lincoln Policy Area, being a 58% increase overall on Lincolnshire Structure Plan provision. This will require significant additional infrastructure, and Growth Point status would help to establish the case for future funding. This will include identified transport projects and may require more sewage treatment capacity, but there are not expected to be water resource issues.
- 2.1.5 Flood risk is an issue in parts of the HMA but Strategic Flood Risk Assessments (SFRAs) are in place. This is covered more fully under each District.

### **Justification for Policy Approach to Local Authorities**

- **Lincoln**

- 2.1.6 The aim of the housing provision of **524** dpa is to focus growth as far as possible in the core urban area of the HMA, SRS and Growth Point bid areas to maximise sustainable patterns of development and use of brownfield land. It is therefore based on total dwelling supply at April 2005, including urban capacity, but not exactly, as the total supply can change year to year. Some elements of urban capacity are projected using past trends. This supply includes two urban extensions already identified in the Structure Plan and confirmed in the SRS. It is felt to be a realistic and balanced approach based on the Council's capacity study and other preparatory work.
- 2.1.7 This provision represents almost a doubling of current build rates (which are reflected in the low trend projection), and will increase the capacity to deliver affordable housing in sustainable locations.
- 2.1.8 Inherent flood risk is a significant issue, but an SFRA is in place and flood defences are of a good standard. Flood risk for particular sites will be considered through the Local Development Framework (LDF) and development control processes.

- **North Kesteven**

2.1.9 The proposed provision of **754** dpa reflects significant existing planning permissions and a proposed new urban extension to Lincoln. It contributes to significantly strengthening the role of Lincoln, as provision in the City of Lincoln is capacity based and the built-up area extends into North Kesteven. It will also enable the recent growth of Sleaford to continue, with emphasis on sustainable development and regeneration of brownfield sites. It will provide new opportunities to meet significant identified affordable housing needs.

2.1.10 This provision is below the DCLG trend projection, but above current and long term building rates. It will require new and improved transport infrastructure in the Lincoln Policy Area (see the SRS). Flood risk is not an issue for most potential development sites. There may be a small impact on Green Wedges, but the SRS includes other enhancements to environmental infrastructure.

- **West Lindsey**

2.1.11 The proposed provision of **552** dpa is very close to the DCLG trend projection and 58% above the Structure Plan provision, as for the HMA as a whole. Build rates have increased dramatically in recent years. This trend will be encouraged in urban areas, to support the regeneration of Gainsborough and the local roles of Caistor and Market Rasen, but not in rural areas.

2.1.12 The provision includes part of an urban extension to Lincoln already identified in the Structure Plan and confirmed in the SRS.

2.1.13 Inherent flood risk is a significant issue in a few parts of the District, but an SFRA is in place and flood defences are generally adequate.

## **2.2 Coastal Lincolnshire HMA**

Proposed Annual Provision: 940 dwellings

### **Justification of Policy Approach to HMA**

2.2.1 The strategic approach to the Coastal Lincolnshire HMA consists of:

- strengthening the sub-regional role of Boston;
- supporting regeneration on the Lincolnshire Coast, in particular Skegness and Mablethorpe;
- strengthening the local roles of the market towns of Louth and Horncastle;

- meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

2.2.2 The housing provision of **940** dpa is significantly below the DCLG trend, but is considered to be more consistent with current build rates, long term migration trends and sustainability considerations. It is based on a realistic view of existing and planned transport capacity, and water resources, which could be a constraint especially in the south of the HMA (Lincolnshire Fens Zone). Parts of the area also have landscape and biodiversity constraints, especially the Wolds Area of Outstanding Natural Beauty (AONB) and coastal conservation sites. Inherent flood risk is also a significant issue, but not necessarily a constraint. This is covered more fully under each District.

2.2.3 The provision is heavily influenced by the justification for East Lindsey, where the trend projection is not accepted as realistic (see below). The interim percentage target for affordable housing in the HMA in Policy 15 is high because the numbers in need were calculated from the trend projection, whereas provision is not. This is seen as a technical issue to be resolved, not a reason for higher total provision.

### **Justification for Policy Approach to Local Authorities**

- **Boston**

2.2.4 The proposed provision of **290** dpa is 23% higher than in the Structure Plan and above long term building rates. This is intended to strengthen Boston's role as a Sub-Regional Centre, but at a level that recognises current infrastructure constraints that will need to be addressed during the Plan period, especially transport capacity. Water resources could also be a constraint on higher levels of growth, even with efficiency measures.

2.2.5 Inherent flood risk is a significant issue, but actual risk is considerably reduced by flood defences, and an SFRA is in place and being updated, so it is not a constraint in most of the District.

2.2.6 The level of provision also aims to allow some scope for migrant workers who wish to stay, but this is a rapidly changing situation and the potential need is not quantified yet.

- **East Lindsey**

2.2.7 The proposed provision of **650** dpa is 23% higher than in the Structure Plan and slightly above past building rates. It will require significant new provision, allowing flexibility to support coastal regeneration and the roles

of market towns. It is also, however, consistent with planned infrastructure provision in a largely remote rural area where accessibility is an issue.

- 2.2.8 The DCLG trend projection is the highest in the East Midlands and also the most at variance with past building rates. It is not accepted as realistic by either the District or County Council. It has never been achieved in the last 30 years and would not be provided by the market. Further evidence in support of this will be prepared before the Regional Plan EiP.
- 2.2.9 Inherent flood risk is a significant issue, but only in small parts of this large rural District, and actual risk is considerably reduced by coastal and fluvial flood defences, so it is not seen as a constraint on the District level of growth. An SFRA is being prepared.

### **2.3 Peterborough (Partial) HMA**

Proposed Annual Provision 1,350 dwellings

#### **Justification of Policy Approach to HMA**

- 2.3.1 The strategic approach to the Peterborough Partial HMA consists of:
- supporting the regional role of Peterborough;
  - significantly strengthening the sub-regional roles of Grantham and Spalding;
  - consolidating the local roles of Oakham and Stamford;
  - meeting affordable housing needs in a way that promotes a more sustainable pattern of development.
- 2.3.2 The proposed provision of **1,350** dpa is below the DCLG trend projection because this is only part of an HMA centred on Peterborough, which is part of a growth area and lies outside the Region. It is also a little below past build rates and migration trends, yet is around 40% higher than the Lincolnshire and Leicestershire & Rutland Structure Plans. It represents a balance between supporting the role of Peterborough and those of the Sub-Regional Centres of Grantham and Spalding and the market towns. It also addresses affordability issues in an area of high demand, by making significant new provision in all local authorities.
- 2.3.3 The eastern part of the HMA is in the Lincolnshire Fens Zone, where water resources are a potential constraint. Inherent flood risk is also a significant issue in the eastern part of the HMA, but not necessarily a constraint. It is covered more fully under each local authority.

## Justification for Policy Approach to Local Authorities

- **Rutland**

2.3.4 The proposed provision of **170** dpa is similar to the trend projection and long-term building rates but below recent building rates. It is intended to help address affordability issues in an area of high house prices and demand and to support the needs of the local economy. Sustainably located development could help consolidate the role of the County's two market towns as locally significant service and employment centres. Inherent flood risk is not a significant issue.

- **South Holland**

2.3.5 The proposed provision of **550** dpa is below the trend projection and recent building rates but above long term building rates. It is intended to support the balanced growth of Spalding as a Sub-Regional Centre and to a lesser extent the smaller market towns. It also addresses affordability issues in an area of high demand, by allowing for significant new provision.

2.3.6 Inherent flood risk is a significant issue, but actual risk is considerably reduced by flood defences, and an SFRA is in place, so it is not a constraint in most of the District. Water resources could also be a constraint on higher levels of growth, even with efficiency measures.

2.3.7 The level of provision also aims to allow some scope for migrant workers who wish to stay, but this is a rapidly changing situation and the potential need is not quantified yet.

- **South Kesteven**

2.3.8 The proposed provision of **630** dpa is below the trend projection and long term building rates but similar to recent building rates. It supports and is consistent with the Growth Point bid for Grantham, which is a Sub-Regional Centre. Growth Point status would help to establish the case for future funding of the necessary infrastructure. It also addresses affordability issues in an area of high demand, by allowing for significant new provision. Given the emphasis on Grantham it is considered that it will encourage sustainable patterns of housebuilding in the south of the District that should not impact on the development of Peterborough.

2.3.9 Inherent flood risk is only a significant issue in small parts of the District, and an SFRA is in place, so it is not a constraint overall. Water resources could also be a constraint on higher levels of growth in the south east of the District (Lincolnshire Fens Zone), even with efficiency measures, but

not in the Grantham area (Lincoln Zone). On the other hand, sewage treatment capacity may be an infrastructure issue for Grantham.

### **3. NORTHERN SUB-AREA**

3.0.1 The proposed HMA dwelling figures represent, for the Sub-area as a whole, an increase over trend projections, and above the highest option in the 'Options for Change' document. Within the Sub-area, however, the emphasis on above-trend growth is shifted towards the Nottingham Outer HMA, where the largest Sub-Regional Centre is located, there is some infrastructure capacity, and significant urban capacity.

#### **3.1 Newark-Ashfield-Mansfield (Nottingham Outer) HMA**

Proposed Annual Provision: 1,465 dwellings

##### **Justification of Policy Approach to HMA**

3.1.1 The strategic approach to the Newark/Ashfield/Mansfield HMA consists of:

- strengthening the sub-regional roles of Newark and Mansfield;
- promoting the regeneration of smaller settlements in former mining areas in a way that promotes a more sustainable pattern of development;
- improving the long term economic prospects of the HMA.

3.1.2 The proposed provision of **1,465** dpa is significantly above the DCLG trend projection and long and short-term migration levels. It is intended to support the two Growth Point bids submitted by the three authorities. The three authorities involved have given commitments to these levels of housing development in their bids.

3.1.3 In the west of the HMA provision above trend will continue the rising in-migration levels, encouraged by improving housing markets and town centre regeneration and support a pilot housing market renewal project in Mansfield. Newark has a strong housing market, but there are some affordability issues in the area. Housing may not need to keep pace with job growth, owing to concerns over out-commuting.

3.1.4 The growth will help to lift job growth beyond the regional average, and some linkage with local economic regeneration is needed as there are large-scale opportunities for economic regeneration in the area. There is considerable previously developed land available, especially to the west of the HMA. Newark is identified as a priority area for an SFRA; any development proposals will have to be informed by that SFRA.

- 3.1.5 Issues arising from the scale and location of growth include the need to safeguard water resources, over-abstraction and pollution in key water courses. Infrastructure investment will be required, and the Growth Point bids will need to address this. In Mansfield and Newark, sewage treatment works would require further infrastructure. The existing town centres, major roads and railways will support levels of growth envisaged in the preferred option, but there are some doubts expressed over access to the M1.
- 3.1.6 Environmental factors highlighted in the Sustainability Appraisal include some sites around the Sub-Regional Centres which would need protection. Air pollution is also high in certain areas such as the M1 corridor and traffic pollution also threatens protected habitats such as lowland heath.

### **Justification for Policy Approach to Local Authorities**

- **Ashfield**

- 3.1.7 For Ashfield as a whole **455** dpa is proposed. In the Hucknall part of Ashfield a provision figure of **120** dpa is considered elsewhere as part of the Nottingham Core HMA in the 3 Cities Sub-area (see para 5.3.23). The rest of the District, which includes Kirkby and Sutton-in-Ashfield, and some smaller settlements, falls within the Northern Sub-area. The remaining provision of **335** dpa is based on maximising the use of urban capacity to deliver urban consolidation and regeneration with no Green Belt release.
- 3.1.8 Employment development in the west Nottinghamshire part of the District has been buoyant in the last 5 years (average take-up 11.1 ha) with no sign of this trend abating. The Mansfield/Ashfield Regeneration Route (MARR) route is likely to deliver further job growth in accessible locations. The level of provision would facilitate the future vitality and viability of Sutton and Kirkby town centres.

- **Mansfield**

- 3.1.9 Provision of **410** dpa is consistent with the Growth Point bid for the area. This will require some additional infrastructure, and Growth Point status would help to establish the case for future funding. There would need to be an increase from current trend projections and build rates in Mansfield in order to achieve the Growth Point ambitions of the authority. Significant urban capacity and supply are available, but further greenfield land would be required. This may assist in addressing low market demand, but the Housing Market Assessment being undertaken will confirm whether this is so.

3.1.10 There are a number of environmentally sensitive sites on the urban fringe of Mansfield, upon which greenfield development could potentially have an impact, and these will need consideration when locating development. The MARR route is likely to deliver further job growth close to Mansfield, and further housing will support the creation of jobs.

- **Newark & Sherwood**

3.1.11 The proposed provision of **600** dpa reflects significant existing supply and a proposed new urban extension, part of the Growth Point bid. It will also provide for opportunities to meet significant identified affordable housing needs. The Newark housing market is strong, and is likely to support higher levels of development, however, too high a level of housing could exceed employment provision in Newark, leading to further, potentially unsustainable out-commuting.

3.1.12 The smaller settlements to the west of the district, while requiring some regeneration, do not represent good opportunities for sustainable development, except where closely associated with Mansfield. Nevertheless the recommended level of housing allows for some development outside Newark, principally to support regeneration. There are significant areas of more rural character, where limited development, for local needs, may be provided for.

3.1.13 A higher level of development for Newark may threaten regeneration ambitions in Mansfield, and possibly Nottingham, and needs to be considered along with the levels of development in Lincoln and Grantham.

3.1.14 Flood risk has been identified as an issue, but is limited to certain areas in the Trent flood plain, and growth could avoid those. However, an SFRA needs to inform any decisions concerning development around Newark.

## **3.2 Northern (Sheffield/Rotherham) HMA**

Proposed Annual Provision: 1,370 dwellings

### **Justification of Policy Approach to HMA**

3.2.1 The strategic approach in the Sheffield/Rotherham HMA consists of:

- strengthening the sub-regional roles of Chesterfield and Worksop;
- promoting the regeneration of smaller settlements in former mining areas in a way that promotes a more sustainable pattern of development;
- improving the long term economic prospects of the HMA.

- 3.2.2 The recommended dwelling figure of **1,370** dpa provides below a trend level for the HMA, to reflect the concentration and regeneration objectives of the strategy. The work on the 'Options for Change' consultation indicated that such a strategy would indicate below-trend provision for the HMA.
- 3.2.3 Recent house building has generated very high in-migration in certain parts of the HMA, which is considered unsustainable. The settlement pattern is more fragmented and there are concerns over the capacity of the area, particularly around Chesterfield, to accept large-scale growth. Nevertheless, elsewhere regeneration is required that will justify new house building. Historically weak housing markets in parts of the HMA are showing some signs of recovery; there is a pilot housing market renewal project in Bolsover.
- 3.2.4 Even at below trend levels greenfield provision for housing would need to be made in all four Districts. There are sensitive areas of landscape and Green Belt within the HMA, including close to settlements. Issues arising from the scale and location of growth include the need to safeguard water resources, over-abstraction and pollution in key water courses. The Regional Flood Risk Appraisal indicates that this HMA contains little risk. Air pollution is high in certain areas such as the M1 corridor and traffic pollution also threatens protected habitats such as lowland heath.
- 3.2.5 The Alliance Sub-Regional Strategic Partnership (SSP) has ambitions to lift job growth beyond the regional average and some linkage with housing growth is suggested. There are large-scale opportunities for economic regeneration in the area. The town centres of Chesterfield and Worksop are responding to regeneration initiatives. Overall, housing should not keep pace with job growth, owing to concerns over existing and increased out-commuting. In this regard the aim of the 'Northern Way' to support urban regeneration and growth within the Sheffield City Region is also recognised.

### **Justification for Policy Approach to Local Authorities**

- **Bolsover**

- 3.2.6 In Bolsover, **350** dpa is proposed; a housing provision equal to the predicted trend. The District has no Sub-Regional Centre, but substantial regeneration needs. While there has been noticeable net migration from Sheffield-Rotherham, reflected in the trend projections, this is less than Bassetlaw and North East Derbyshire; commuting to South Yorkshire is also less. East-West commuting within the Sub-area is more significant.
- 3.2.7 The lack of a Sub-Regional Centre and a historically weak housing market in parts of the District raises concerns over whether sufficient housing can

be delivered – however there is a need for integrated regeneration of a number of smaller settlements. A higher level of housing could exceed employment provision, leading to unsustainable out-commuting. The fragmented pattern of small settlements means that despite areas of brownfield land, urban capacity for housing is limited and higher levels of housing would result in greenfield development.

- **Chesterfield**

3.2.8 In Chesterfield, the highest provision in the HMA of **360** dpa is proposed, reflecting the concentration and regeneration strategy. Chesterfield is a Sub-Regional Centre serving northern Derbyshire for employment, shopping and services, but its capacity for further above trend housing development in the longer term is constrained. There has been noticeable net migration from Sheffield and Rotherham into Chesterfield and commuting to South Yorkshire is significant, albeit less than surrounding Districts.

3.2.9 Whilst there is currently significant capacity on brownfield former industrial land, this is likely to be used up by 2016 under current Local Plan proposals. Further longer term urban capacity is only likely to be identifiable at a later stage.

3.2.10 Key constraints include a congested primary road infrastructure and flood risk in the river corridors which bisect the Borough. There is also concern about the danger of merging Chesterfield with Staveley and Brimington to the east as well as Dronfield to the north – the Green Belt and open land are important in protecting the separation.

- **North East Derbyshire**

3.2.11 In North East Derbyshire **330** dpa is to be provided for, owing to the need to continue regeneration in those parts of the District where it is needed. This is a level above trend and annual build rates for the district, but this is not so great as to require significant new development in the northern part.

3.2.12 There have been significant levels of net migrations from Sheffield-Rotherham reflected in the trend projections, and there are high out-commuting levels to South Yorkshire shown in the Census. Above trend level provision for the northern and western parts of the District, much of which is also constrained by the Sheffield Green Belt, would be inappropriate.

3.2.13 The southern part of the District is not subject to influence from Sheffield-Rotherham, and has several smaller settlements in need of continued regeneration. There are significant areas of more rural character in the

west of the District, abutting the Peak District National Park, where only limited development for local needs should be provided for.

3.2.14 There is a degree of flood risk identified for NE Derbyshire that may be moderately significant for development.

- **Bassetlaw**

3.2.15 Provision of **330** dpa, representing below trend and below annual build rates is proposed for Bassetlaw. This will be sufficient to support the role of Worksop as a Sub-Regional Centre and respond to regeneration measures in the area.

3.2.16 There have been significant levels of net migrations from Sheffield-Rotherham reflected in the trend projections, especially in Worksop with large long-standing housing permissions recently being built. There are consequently high out-commuting levels to South Yorkshire. For these reasons above trend level provision for the District would be inappropriate.

3.2.17 Regeneration is taking place in Worksop, but further support for the viability of the town is warranted. The influence of the Robin Hood Airport may be particularly felt in settlements in the north-west of the District, including Worksop. The western part of the District is more remote, but with a healthy housing market centred on Retford.

3.2.18 Water resources have been identified as a constraint in Worksop, where the sewage treatment works would be at risk of not meeting their discharge consent; these would require further infrastructure investment. There is a degree of flood risk identified in the District, significant because parts of the flood risk areas coincide with the main towns.

## **4. PEAK SUB-AREA**

### **4.1 Peak, Dales and Park HMA**

Proposed Annual Provision 420 dwellings

#### **Justification of Policy Approach to HMA**

4.1.1 The strategic approach in the Peak, Dales and Park HMA consists of:

- complying with the statutory purposes of the Peak District National Park;
- consolidating the local roles of Buxton, Matlock and Glossop;
- meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

- 4.1.2 The provision is **420** dpa, significantly below the current DCLG trend and long term migration trends, but considered consistent with sustainability considerations and giving particular attention to the following issues:
- complementing regeneration policies in Greater Manchester and South Yorkshire;
  - maintaining the environment, particularly in the Peak District National Park itself;
  - considering trends in housing affordability and the capacity to deliver affordable housing.
- 4.1.3 The particular considerations relating to the Peak District National Park mean that the Park's dwelling provision is not included as part of the HMA total. In reality, however some provision will be made within the limited categories of National Park housing policy. A nominal figure of 43 dpa represents expected provision and is not a target or control figure.
- 4.1.4 The HMA total of **420** dpa has therefore been divided between the two other Districts in proportion to the relative growth of local household numbers indicated by the "nil net migration" household projections i.e. 64% to High Peak Borough and 36% to Derbyshire Dales District. This is the same proportion as in current strategic policy.

#### **Justification for Policy Approach to Local Authorities**

- **Derbyshire Dales**

- 4.1.5 In this local authority area restrictive policies apply in order to pursue the Regional Plan's overall approach to selecting land for development as set out in Policy 2. The proportion explained above results in **150** dpa in Derbyshire Dales District.

- **High Peak**

- 4.1.6 In this local authority areas restrictive policies apply in order to help complement regeneration efforts in adjacent parts of Greater Manchester. A housing provision figure of **270** dpa is given.

- **Peak District National Park**

- 4.1.7 In complying with the statutory purposes of the Peak District National Park, the level of housing provision within it will be low, providing only for development in the following limited categories:
- locally-needed affordable / housing provided as "rural exceptions"
  - agricultural dwellings – where appropriate justification is provided

- additional dwellings provided by appropriate conversions
- dwellings provided as “enabling development” to achieve necessary and agreed enhancements

4.1.8 It is estimated that development in these limited categories will total **43** dpa.

## **5. 3 CITIES SUB-AREA**

### **5.1 Derby HMA**

Proposed Annual Provision: 1,770 dwellings

#### **Justification of Policy Approach to HMA**

5.1.1 The strategy in the Derby HMA consists of:

- strengthening the role of Derby as a Principal Urban Area through urban intensification and planned and sustainable urban extensions;
- avoiding unsustainable levels of development in smaller settlements in Amber Valley and South Derbyshire;
- supporting the regeneration of Swadlincote, Alfreton, Belper, Heanor and Ripley in a way that is consistent with the role and function of these towns;
- meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

5.1.2 Trend projections for the Derby HMA are much higher relative to its population than elsewhere in the 3 Cities Sub-area. This is particularly the case in Amber Valley and South Derbyshire. The projections reflect substantial past housebuilding in these Districts, much of which has taken place in locations not closely related to Derby PUA. The volume of housing in such areas has attracted a large number of in-migrants, which the DCLG trend projections assume will continue. These high levels of in-migration, however seem to have encouraged out-commuting.

5.1.3 To meet the projected trend in full in each District would raise sustainability concerns. The strategy for Derby HMA is therefore to plan for overall housing growth somewhat below the migration trend at **1,770** dpa. This level, still allows for a greater proportion of in-migrants than elsewhere in 3 Cities. It also allows for a substantially increased focus on the PUA.

5.1.4 The shortfall on the trend is offset in 3 Cities as a whole by above trend provision elsewhere, particularly in Nottingham HMA. Past development in Nottingham HMA has been constrained and trend projections are

- consequently lower relative to population. The distribution of housing proposed in the 3 Cities SRS between the 3 HMAs is therefore better aligned with their respective population levels than would be the case with a rigid application of the trend.
- 5.1.5 A number of choices were considered for distributing housing within the HMA. Options for dispersed or highly concentrated development were rejected in favour of a strategy that combines an increased focus on the PUA with continued regeneration in the larger towns. Housing provision for Derby PUA is therefore set at 980 dpa, well above recent housebuilding rates and above the trend projection for Derby City. Provision in the non PUA parts of Amber Valley and South Derbyshire is consequently below that implied by the trend projection. However this provision is considered sufficient to allow for the continued regeneration of Swadlincote, as a Sub-Regional Centre, and the four main towns of Amber Valley – Belper, Ripley, Heanor and Alfreton.
- 5.1.6 The proposed strategy embodies the principles of the Derby HMA part of the 3 Cities bid for Growth Point status. This envisages additional housing over the period 2006-2021 compared to the current Regional Spatial Strategy (RSS) baseline, focused particularly on the Derby PUA. This shorter Growth Point period is likely to see higher annual average building rates as compared to the proposed 3 Cities SRS rates for 2001-2026, particularly in the PUA. This is because completions since 2001 have generally been below the proposed SRS rate and additional houses will therefore be needed to make up the deficit.
- 5.1.7 There is substantial capacity on brownfield sites within the Derby PUA and this will be enhanced by the 5,000 houses anticipated in the City Centre as part of Derby Cityscape Urban Regeneration Company's (URC's) Masterplan. This additional housing is a key element of the Growth Point proposals. Brownfield capacity will not however be sufficient to meet all the proposed provision to 2026 and there will also be a need for significant urban extensions around Derby.
- 5.1.8 In considering the best general locations for sustainable urban extensions, regard has been had to the criteria in the Regional Plan Policy 2 and available information about constraints and opportunities around Derby's periphery. Locations to the north west in Amber Valley are constrained by Green Belt, topography, heritage features and the need to avoid closing off the 'mouths' of Green Wedges penetrating the City. Locations in Erewash are constrained by Green Belt areas which are recognised in the Green Belt Review as being of prime importance.
- 5.1.9 The better opportunities seem to be within South Derbyshire. This broad area is well located in relation to employment opportunities and there is

scope for development on the scale envisaged to take place without taking Green Belt or adversely affecting Green Wedges. However, there will be a need for major investment in highway and transport corridor improvements, the provision of green infrastructure and the resolution of drainage capacity problems. Any development proposals will have to be informed by a SFRA, the preparation of which is recognised as being of significant priority.

### **Justification for Policy Approach to Local Authorities**

- **Derby**

5.1.10 The proposed provision of **700** dpa is above recent annual build rate and the existing Regional Spatial Strategy (RSS) baseline, but below the City's trend projection. This is the maximum provision considered feasible within the City boundary having regard to current assessments of capacity. The provision should be achievable without major detriment to Green Wedge or Green Belt areas, subject to the necessary investment in infrastructure to support housing growth.

5.1.11 Account has been taken of the City Centre proposals of Derby Cityscape which form an important component of the Growth Point bid. The phasing of development is therefore expected to be weighted towards the 2006-2021 period.

5.1.12 The Derby City provision will be supplemented by the Derby PUA elements of the housing proposed for Amber Valley and South Derbyshire. In total the policy allows for a Derby PUA total of 980 per year, well above the City trend.

- **Amber Valley**

5.1.13 A small part of the Amber Valley provision of **465** dpa is allocated to the Derby PUA. This reflects existing Local Plan commitments. The provision for the District in general is significantly below the trend, reflecting the strategy outlined above. In the non PUA parts of Amber Valley the proposed provision may create a need for urban extensions in some or all of the towns highlighted, depending on the amount of additional brownfield land that can be brought forward.

- **South Derbyshire**

5.1.14 South Derbyshire's provision of **605** dpa reflects the need for substantial urban extensions to the Derby PUA within the District. The PUA element accounts for 255 dpa of the total provision. The provision for the District as a whole is slightly below the trend, reflecting the strategy of some restraint

in terms of past trends for locations outside the PUA. Outside the PUA, the proposed provision may however create a need for urban extensions in Swadlincote, depending on the amount of additional brownfield land that can be brought forward.

## **5.2 Leicester & Leicestershire HMA**

Proposed Annual Provision: 3,780 dwellings

### **Justification of Policy Approach to HMA**

5.2.1 The strategy for the Leicester and Leicestershire HMA consists of:

- strengthening the role of Leicester as a Principal Urban Area through urban intensification and planned and sustainable urban extensions;
- strengthening the sub-regional roles of Coalville, Melton Mowbray, Loughborough, Hinckley and Market Harborough;
- meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

5.2.2 The housing strategy for the Leicester and Leicestershire HMA is one which focuses on the Leicester urban area, initially by capitalising on its substantial urban capacity. However, this will be insufficient to meet all the proposed provision to 2026, and later in the plan period, this will need to be met by planned sustainable urban extensions.

5.2.3 In considering the areas of search for these urban extensions, regard has been had to criteria in the Draft Regional Plan Policy 2 and an assessment of constraints and opportunities around Leicester. The best opportunities to meet the bulk of the additional provision for the PUA lie west of Leicester in Blaby (between the A47 and the M69) and north of Leicester in Charnwood (east of Thurmaston).

5.2.4 The consideration of constraints and opportunities has identified the need for significantly improved transport and other infrastructure, and further investigations will be carried out to identify specific requirements.

5.2.5 A number of factors, particularly the cost and feasibility of providing transport links to the major road network, rule out the prospect of planned sustainable urban extensions to the PUA in Harborough or Oadby and Wigston.

5.2.6 Beyond the PUA, sustainable urban extensions are proposed to Loughborough, Hinckley and Coalville to support their roles as Sub-Regional Centres.

5.2.7 Further detail on the approach and justification of housing provision in the HMA is available on the website [www.emra.gov.uk/regionalplan](http://www.emra.gov.uk/regionalplan)

### **Justification for Policy Approach to Local Authorities**

- **Leicester**

5.2.8 The total provision of about 29,500 dwellings – **1,180** dpa in Leicester is considered to be achievable during the Regional Plan period 2001-2026 provided that increased financial resources are available for new infrastructure to support this level of growth e.g. open space, health and community facilities and affordable housing.

5.2.9 The regeneration of land identified within the City's Strategic Regeneration Area (SRA) is fundamental to the Plan's Strategy. The SRA includes the five key projects in Leicester Regeneration Company's (LRC's) Master Plan. The LRC has prepared detailed Area Development Frameworks for the proposed residential quarters - Abbey Meadows, St George's and Waterside and the City Council has prepared Supplementary Planning Documents to guide future development.

5.2.10 These specific proposals could accommodate at least 7,500 new homes and they form a key element of the 3 Cities PUA Growth Point bid. This level of City Centre housing provision affords opportunities to provide for public realm improvements and new green infrastructure. However, increased public investment will be essential to ensure new sustainable mixed communities and a high quality environment. Private developer contributions will not be sufficient to achieve this alone.

5.2.11 Greenfield development is also planned through sustainable urban extensions at Ashton Green and Hamilton and the re-use of surplus allotment land within the City. The Local Plan identifies Green Wedges and other green space within the City where development will be resisted.

5.2.12 Historical build rates have been low in Leicester and consequently the Structure Plan annual target of 950 dpa has not been met. However, since 2002/03 housing completions in Leicester have been on an upward trend, especially within the City Centre where regeneration activity has been gathering pace. Additional resources through Growth Point status should ensure that the planned development is to a higher quality design and is delivered earlier. In order to maximise this brownfield regeneration supply, it is essential that there is a strong phasing mechanism to control suburban greenfield housing land releases within the Leicester PUA.

5.2.13 There could be scope to increase the City's estimated housing supply through increased densities at Ashton Green and Hamilton, in addition to

higher density developments within the City Centre regeneration areas. However, further in-house work will be required on an assessment of urban capacity for the EiP, and subject to funding being identified, it may be appropriate to commission an independent study of future urban capacity.

- **Blaby**

5.2.14 The proposed provision of **340** dpa reflects the proposal to locate an urban extension to the PUA of 4,000 dwellings in the District and the need to provide for more local needs in the numerous large villages to the south of Leicester. It is above the current build rate but below the DCLG trend projection for Blaby. There is only a small Local Plan allocation of 10 dwellings left to be implemented and over one third of the provision is accounted for by the identified supply. The build rate has fallen recently, reflecting the fact that Local Plan allocations have been largely completed.

5.2.15 In terms of the area of search for an urban extension, the constraints south of Leicester including the uncertainties relating to the provision of a new link road to the south make this area less suitable for a sustainable urban extension than the area west of Leicester, where in the longer term, opportunities are provided by M1 widening.

- **Charnwood**

5.2.16 The proposed provision of **760** dpa reflects the proposal to locate sustainable urban extensions to the PUA and Loughborough of 4,850 dwellings each. It is above the current build rate and the DCLG trend projection for Charnwood. Local Plan allocations amount to over 600 dwellings and about one third of the provision is accounted for by the identified supply.

5.2.17 Most of the growth will take place adjoining the Leicester PUA and within and adjoining Loughborough. An area of search for a sustainable urban extension has been identified to the north of Leicester where there is the opportunity of linking with the existing development at Hamilton, and to the A46 at Thurmaston. The Borough Council is currently investigating the most suitable location for the urban extension to Loughborough.

- **Harborough**

5.2.18 The proposed provision of **345** dpa reflects the proposal not to locate any major new development either adjoining the PUA or Market Harborough. It is consequently below the current build rate and the DCLG trend projection for Harborough. These reflect a significantly higher growth in the District in recent years (the highest build rate outside Leicester) than

would be expected within a largely rural District. A large proportion of this has been related to rural centres rather than the urban areas.

5.2.19 The Local Plan allocations include a site at Kibworth of over 700 dwellings that has now been given planning consent. About 60% of the provision is accounted for by the supply, most of which is in Market Harborough.

- **Hinckley & Bosworth**

5.2.20 The proposed provision of **460** dpa reflects the proposal to locate a sustainable urban extension of 4,850 dwellings to Hinckley. It is slightly above the current build rate and the DCLG trend projection for Hinckley and Bosworth. The supply is about one third of the total provision, and there is a comparatively small amount of Local Plan allocations.

5.2.21 Most of the growth in Hinckley and Bosworth will take place within and adjoining Hinckley to support its role as a Sub-Regional Centre. The Borough Council is currently investigating the most suitable location for the sustainable urban extension to Hinckley.

- **Melton**

5.2.22 The proposed provision of **160** dpa reflects the proposal to provide a modest urban extension of 1,250 dwellings to Melton Mowbray. It is close to the existing build rate and below the DCLG trend projection for Melton. The supply (which excludes the Melton Mowbray new village allocation, which is considered to be not conforming to the Structure Plan) amounts to about half of the total provision.

5.2.23 The proposed provision would support Melton Mowbray's role as a Sub-Regional Centre and its social needs including affordable housing, and transport infrastructure provision. Melton Mowbray is a sustainable location in its own right, and is the social and economic focus of the Borough. The Borough already has a high degree of self-containment in terms of travel to work. The level of growth proposed would help to ensure this balance of housing and employment is maintained.

5.2.24 The Borough Council is already seeking a location for a planned sustainable urban extension to Melton Mowbray.

- **North West Leicestershire**

5.2.25 The proposed provision of **480** dpa reflects the proposal to locate a sustainable urban extension of 4,850 dwellings to Coalville. It is above the current build rate but below the DCLG trend projection for North West Leicestershire. The supply is about 40% of the total provision, and there is

a large Local Plan allocation at Hugglescote that remains to be implemented.

5.2.26 Most of the growth in North West Leicestershire will take place within and adjoining Coalville to support its role as a Sub-Regional Centre and the continued regeneration of the town. The District Council is starting to investigate the most suitable location for the urban extension to Coalville.

- **Oadby & Wigston**

5.2.27 The proposed provision of **55** dpa reflects the proposal not to locate any major new development adjoining the PUA in the Borough. It is consequently below the current build rate and the DCLG trend projection for Oadby and Wigston. The Borough is largely built up and has a high level of supply, almost half its total provision.

### **5.3 Nottingham Core HMA**

Proposed Annual Provision: 2,370 dwellings (2,490 including Hucknall)

#### **Justification of Policy Approach to HMA**

5.3.1 The strategy for the Nottingham Core HMA consists of:

- strengthening the role of Nottingham as a Principal Urban Area through urban intensification and planned and sustainable urban extensions;
- meeting affordable housing needs in a way that promotes a more sustainable pattern of development.

5.3.2 In order to deliver this strategy an HMA benchmark of around **2,370** dwellings per annum (excluding Hucknall) has been used. This is above the DCLG trend but is considered to be consistent with sustainability considerations and recent migration trends, which are higher than longer term trends. The provision also reflects the economic potential of the HMA.

5.3.3 An iterative process was undertaken which looked at constraints and opportunities at both a strategic and detailed level. It was concluded that although the above trend level of growth was appropriate at the HMA level (subject to provisos, in particular the availability of resources), it would be both undesirable and unachievable in Nottingham City.

5.3.4 The above trend level of growth would have led to 29,000 dwellings in Nottingham City between 2001 and 2026. A total provision of about 23,625 dwellings in Nottingham between 2001 and 2026 is considered to be challenging but achievable. As a consequence it was necessary to

- decide how best to redistribute Nottingham's 'shortfall' (of over 5,000 dwellings) within the HMA, whilst focusing development on the PUA.
- 5.3.5 The Nottingham Core HMA is surrounded by Green Belt and the distribution of development has been informed by a Review of the Nottingham-Derby Green Belt as required by RSS8. The Green Belt Review has identified the area immediately between Nottingham and Derby and the areas immediately on the northern side of the HMA as the most important areas of Green Belt. South and east of Nottingham the Green Belt serves fewer purposes because it is not separating major areas of development. The general implication of the analysis is that areas for growth to the east and south of Nottingham would impact less on the Green Belt than the areas to the west of Nottingham.
- 5.3.6 In parallel with the Regional Plan work the Growth Point bid suggests that a major urban extension is considered to be the best way of accommodating some of this 'shortfall', because it can build on existing and proposed infrastructure and is capable of integration with the existing urban area. It also enables Growth Point funding to be deployed to ensure infrastructure needs are met.
- 5.3.7 It is clear that the number of opportunities for major extensions is limited. Locations to the west of Nottingham, between Derby and Nottingham were discounted because of the sensitive nature of the Green Belt to accommodate an extension of this magnitude in this area. Other locations can be discounted for other reasons, such as flooding issues. The south of Nottingham has been identified as the most appropriate location for significant growth, as it causes least harm to the purposes of the Green Belt and avoids areas of high landscape value to the east of the PUA. Development to the south of the PUA can also take advantage of existing and planned infrastructure, particularly the upgrading of the A453, the extension of the Nottingham Light Transit Line, the Trent River Park proposals and the East Midlands Parkway Station on the Midland Main Line. It will also be well related to Nottingham East Midlands Airport.
- 5.3.8 The result for the Nottingham Core HMA is a provision figure of 2,490 dpa, of which 1,840 dpa should be within or adjoining Nottingham PUA. The provision figure is above the current build rate as are the provision figures for each District.
- 5.3.9 The proposals contained within the 3 Cities Growth Point bid are consistent with the distribution of housing development described in the paragraphs below.

- 5.3.10 Development proposals throughout the HMA should take opportunities to improve the quality of the environment including provision of semi-natural green space.
- 5.3.11 One important distinguishing environmental feature in the HMA is the River Trent, where there are opportunities for environmental enhancement, nature conservation, and leisure and cultural use. Growth Point funding and the Trent River Park Partnership will provide means of taking this forward.
- 5.3.12 There is a significant area of land in the HMA at risk from flooding. There is a need for flood risk to be reduced in some locations and significant flooding may occur from some secondary sources. None of the Local Planning Authorities (LPAs) have completed a SFRA although Nottingham City Council has carried out some work in conjunction with the Environment Agency and are currently awaiting results of a strategic study of the River Trent.

### **Justification for Policy Approach to Local Authorities**

- **Erewash**

- 5.3.13 The proposed provision of **290** dpa is close to the current build rate. Much of Erewash is within the PUA, whilst Ilkeston is identified as a Sub-Regional Centre, and some of the proposed provision would support this role. Provision includes the possibility of development on the brownfield former Stanton Ironworks site to the south of Ilkeston for both housing and employment. Constraints include the potential coalescence of settlements as well as significant areas of flood risk.

- **Nottingham**

- 5.3.14 The proposed provision of **945** dpa (all within Nottingham PUA) is above the current build rate. The figures for Nottingham City are determined by the capacity for development within the existing urban area, since the administrative boundaries of the City are almost wholly within the urban area.
- 5.3.15 The total provision of about 23,625 dwellings in Nottingham during 2001-2026 is considered to be challenging but achievable provided that increased financial resources are available for new infrastructure to support this level of growth e.g. open space, health and community facilities and affordable housing.
- 5.3.16 The regeneration of land identified within the City's Eastside, Riverside and Southside Regeneration Zones is fundamental to the strategy and

increased public investment will be essential to ensure new sustainable mixed communities and a high quality environment. Private developer contributions will not be sufficient to achieve this alone.

5.3.17 Further in-house work will be required on an assessment of urban capacity for the EiP, and subject to funding being identified, it may be appropriate to commission an independent HMA-wide study of future urban capacity.

- **Broxtowe**

5.3.18 The proposed provision of **270** dpa is above the current build rate. Broxtowe also has a relatively large urban capacity and planned provision incorporating sites identified for development in the Local Plan adopted in 2004. Constraints include not only the potential coalescence of settlements, but also significant areas of flood risk. Whilst Kimberley and Eastwood are not part of the PUA, development provision also supports their development as sustainable urban areas within the HMA.

- **Gedling**

5.3.19 The proposed provision of **310** dpa is above the current build rate. Gedling has a large provision for urban capacity and planned development on the basis that a Local Plan for the District was adopted in 2005. The Local Plan identified significant areas for development including part of the former Gedling Colliery and an area to the north of Hucknall taking advantage of the Nottingham Express Transit (NET) and the Robin Hood Line. The Green Belt Review identified areas to the east of Nottingham as performing a less important function than to the west of the HMA, however, constraints to the east of the PUA include landscape quality.

- **Rushcliffe**

5.3.20 The proposed provision of **555** dpa is above the current build rate. Rushcliffe is an area of high housing demand and where the Green Belt Review has identified the Green Belt performing a less important function than to the west of the HMA. Transport capacity and infrastructure investment will be an important consideration for the location of future development as will the avoidance of areas of significant flood risk.

5.3.21 A major sustainable extension to the south of Clifton adjoining the PUA can take advantage of existing and planned infrastructure, particularly the upgrading of the A453, the extension of the Nottingham Light Transit Line, the Trent River Park proposals and the East Midlands Parkway Station on the Midland Main Line. It will also be well related to Nottingham East Midlands Airport.

5.3.22 One brownfield regeneration possibility to be considered is development related to the former Cotgrave Colliery. However, the advantages of brownfield development will need to be weighed against sustainability issues, including access to the PUA and implications for the highway infrastructure.

- **Hucknall (Ashfield)**

5.3.23 The proposed provision of **120** dpa is above the current build rate. The provision for the Hucknall part of Ashfield, includes planned provision already included in the Local Plan approved in 2002. Whilst Hucknall is not part of the PUA, it is identified as a Sub-Regional Centre, and provision should support this role.

## **6. SOUTHERN SUB-AREA**

### **6.1 Northampton (West Northamptonshire) HMA**

#### **Justification of Policy Approach to HMA**

6.1.1 The approach in this HMA is the roll-forward of the Milton Keynes South Midlands Sub-Regional Strategy housing provision contained within its Part B for Northamptonshire by a further five years from 2021, consistent with its Part A and the original MKSM Study.

#### **Justification for Policy Approach to Local Authorities**

- **Northampton**

6.1.2 Provision for Northampton (and which as in the MKSM Sub-Regional Strategy means the urban area and any urban extensions including beyond the Borough boundary- i.e. the Northampton Implementation Area) is not given in the submitted Draft Regional Plan for any time period between 2001 and 2026. This is because work associated with replacing the figure for Northampton Implementation Area (NIA) deleted as a consequence of the successful legal challenge to the Sub-Regional Strategy is currently in progress. A separate consultation will take place from December 2006.

6.1.3 The provisional planning assumption for the NIA post-2021 is the continuance of the annual average provision for the period 2016 to 2021 when this has been confirmed.

- **Daventry**

6.1.4 Provision within Daventry District outside of Northampton's built-up area and any urban extensions beyond 2021, will be the continuance of the average provision of **540** dpa identified between 2001 and 2021 in the Sub-Regional Strategy. The expectation is that this post-2021 provision will continue to be concentrated at Daventry town.

- **South Northamptonshire**

6.1.5 Provision within South Northamptonshire District outside of Northampton's built-up area and any urban extensions beyond 2021, will be the continuance of the average provision of **330** dpa identified between 2001 and 2021 in the Sub-Regional Strategy. The expectation is that this post-2021 provision will be focused at one or other or both urban areas in the District (Towcester and Brackley).

**6.2 Corby/Kettering/Wellingborough (North Northamptonshire) HMA**  
Average Proposed Annual Provision figure (post 2021): 2,795

**Justification of Policy Approach to HMA**

6.2.1 The approach in this HMA is the roll-forward of the Milton Keynes South Midlands Sub-Regional Strategy housing provision contained within its Part B for Northamptonshire by a further five years from 2021, consistent with its Part A and the original MKSM Study. The review of the Joint Core Strategy for North Northamptonshire will assess if the roll-forward of post-2021 provision within Districts remains the most appropriate provision, and adjust as necessary.

**Justification for Policy Approach to Local Authorities**

- **Corby**

6.2.2 Provision for Corby (and which as in the MKSM Sub-Regional Strategy means the urban area and any urban extensions including beyond the Borough boundary) will be the continuance of the average provision of **1,060** dpa identified for 2016 to 2021 in the Sub-Regional Strategy. The expectation is that this post-2021 provision will be at Corby and its urban extensions.

- **Kettering**

6.2.3 Provision for Kettering will be the continuance of the average provision of **630** dpa identified for 2016-21 in the Sub-Regional Strategy. The

expectation is that this post-2021 provision will be focussed at Kettering town.

- **Wellingborough**

6.2.4 Provision for Wellingborough will be the continuance of the average provision of **685** dpa identified for 2016 to 2021 in the Sub-Regional Strategy. The expectation is that this post-2021 provision will be concentrated at Wellingborough town.

- **East Northamptonshire**

6.2.5 Provision for East Northamptonshire will be the continuance of the average provision of **420** dpa identified for 2016 to 2021 in the Sub-Regional Strategy. The expectation is that this post-2021 provision will be concentrated at the small towns/rural service centres in the District.

## **7. East Midlands Region**

7.1 The Total annual housing provision figure for the whole Region equates to 20,418 dwellings per annum. This represents nearly 30% above the current RSS8 provision; some 17% above the current build rate and 4.6% above the DCLG trend projections.

7.2 The proposed provision is equivalent to some 382,500 new houses between 2001 and 2026 in the Region outside of Northamptonshire. Of these around 55,500 have already been built; 121,000 are identified in development plans and from information from Local Authorities and 74,000 are estimated supply from anticipated sources in addition to planned development.

## **PART 2**

### **Gypsy & Traveller Pitch Requirements**

#### **1 East Midlands Regional Plan**

- 1.1 The timetable for the review of the East Midlands RSS requires EMRA to publish the Draft Regional Plan in September 2006. Few if any local authorities will have completed Gypsy and Traveller Accommodation Assessments (GTAAAs) in time to inform the Draft Regional Plan by September 2006. Pending completion of GTAAAs, EMRA has assessed whether there is sufficiently robust information about known immediate need on which to establish pitch numbers for each Planning Authority, as required by Circular 01/2006, for inclusion in the Draft Regional Plan.
- 1.2 EMRA has noted ODPM guidance that "...the Caravan Count data can provide a proxy for the amount of unmet need for authorised pitches"<sup>i</sup>, and has produced the following proposed draft policy, taking account of known immediate need based upon averages derived from the twice-yearly Caravan Count undertaken on behalf of ODPM between July 2000 and July 2005.
- 1.3 EMRA has also taken into account such local knowledge and expertise as can be provided by LAs or others during the drafting stage, and will continue to do so where possible. Data received up to the end of July 2006 has been incorporated in this policy in the Draft Regional Plan, as appropriate.

#### **2 Extent of existing regional provision**

- 2.1 The figures in this section are based upon the July 2005 Caravan Count.
- 2.2 816 caravans were accommodated on authorised sites in the East Midlands. 346 of these were on socially-rented Authorised Sites, and 470 were on Private Authorised Sites.
- 2.3 The former provide 298 pitches and are provided by Local Authorities (LAs). Of these 259 pitches are residential and 39 are transit. They provide a total capacity for 394 caravans.
- 2.4 Given the mobile nature of the Gypsy and Traveller population it is logical that a certain percentage of pitches will be vacant at any time. It is unclear, however, what level of unoccupied pitches is implied by the

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<sup>i</sup> Gypsy and Traveller Accommodation Assessment, Draft Practice Guidance February 2006

difference between the total capacity of socially-rented Authorised Sites for 394 caravans, and the recorded occupancy rate of 346 caravans. It may be that all pitches were occupied, but some were only occupied by 1 caravan when they have capacity for 2 or more. No conclusions can be drawn about vacancy rates, therefore.

2.5 There are no sites currently provided by Registered Social Landlords (RSLs).

2.6 For the purposes of this paper it is assumed that this level of existing provision will continue unchanged.

### 3 Evidence of Need

3.1 At 19 July 2005 there were an estimated 1123 gypsy caravans in the East Midlands.

3.2 Less the 816 caravans on authorised sites, as noted above, 307 caravans were on unauthorised sites. This can be broken down as follows:

Unauthorised sites on land owned by gypsies without planning permission		Unauthorised sites on land not owned by gypsies without planning permission	
Tolerated	Not Tolerated	Tolerated	Not Tolerated
44	53	34	176

### 4 Identification of parts of the region with high numbers of unauthorised sites

4.1 EMRA has analysed Caravan Count data over a longer period to develop an understanding of those Planning Authorities with the highest and lowest numbers of caravans on unauthorised encampments, on the dates in which the Count was conducted. These figures formed part of our early consultation with regional and local stakeholders.

4.2 The proposed Interim Minimum Additional Pitch Requirements take account of known immediate need based upon averages derived from the twice-yearly Caravan Count undertaken on behalf of ODPM between July 2000 and July 2005 (except where a current GTAA or other reliable local data is available as noted in the section on Proposed Adjustments below). The proposed figures have not been revised to take account of the January 2006 Caravan Count (published in June 2006) because of changes in the way count data is presented, and because this is a broad

approach to establish minimum estimated requirements which has already been subject to local consultation.

## **5 Proposed Adjustments to Pitch Requirements**

- 5.1 For some local authorities EMRA has proposed adjustments for the reasons given below.
- 5.2 North Kesteven District Council has granted planning permission for 8 new pitches since July 2005. This should address the pitch requirements identified in the averages derived from the Count Data. No further requirements are proposed for this Authority, therefore, pending completion of their GTAA.
- 5.3 South Kesteven District Council, South Holland District Council and Bassetlaw District Council have carried out accommodation needs assessments. Figures from these have been used in place of Count Data, for these authorities.
- 5.4 Leicestershire authorities have advised that a total of 691 Unauthorised Encampments have been recorded between 1997 and 2005, giving an average of 75<sup>i</sup> per year. As this is a total figure it is likely to include some double counting. It is proposed, therefore, that the figure for the Leicester and Leicestershire HMA is expressed as a range between the average derived from the Caravan Count data, and the above figure.
- 5.5 A similar approach is proposed for Ashfield District Council and Nottingham City Council which provided details of UEs in the district between 1/4/05 and 31/3/06. The largest encampment comprised up to 29 caravans for Ashfield, and 25 caravans for Nottingham.
- 5.6 Northamptonshire Countywide Traveller Unit has provided more detailed data for the maximum and minimum numbers of caravans belonging to regular and transient groups between 1 January and 31 December 2005. Because of concerns about the Caravan Count data under-estimating need, these figures have been used wherever they are higher than the average derived from Caravan Count data. There are 2 proposed developments in Corby which, if implemented, would be expected to reduce Corby's approximate need to 9 residential sites (plus additional transit sites). The lower figures for Corby are noted pending the outcome of Gypsy and Traveller Site Grant decisions relating to these developments.

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<sup>i</sup> Figures for Rutland have been removed from the data provided by Leicestershire.

- 5.7 Erewash Borough Council has provided details of all known Unauthorised Encampments during this period. Figures relating to an encampment during July 02 which were not reflected in the Caravan Count have been used to calculate a revised average.
- 5.8 Rushcliffe Borough Council has pointed out the anomalous nature of the July 04 count data for their Borough, which is vastly higher than for other counts in the period covered. To even out the effects of this an adjustment for Rushcliffe is proposed which replaces the July 04 figure with an average derived from the other data in the period covered (i.e. 4 caravans) and recalculates the average for the whole period.

## **6 Interim minimum estimate of additional pitch requirements by Planning Authority**

- 6.1 In summary, this suggests the interim minimum number of additional caravans for which pitches are required, by HMA, as set out in Appendix 2a.
- 6.2 **These are interim minimum standards which would begin to address the deficit in current provision arising from Unauthorised Encampments only.** They do not project future demand. Neither do they take full account of unmet demand arising from other sources which is not captured in the Caravan Count and which are further discussed later in this paper.
- 6.3 As soon as Local Authorities publish Local Development Frameworks containing pitch requirements derived from robust Gypsy and Traveller Accommodation Assessments, these figures will be superseded. They may also evolve in response to further data provided by LAs during the RSS consultation period.
- 6.4 It is not possible to indicate whether additional pitches should be residential or transit pitches, based upon Caravan Count Data alone. Since the figures are derived from Unauthorised Encampments it is likely that at least some should be transit pitches. Local Development Frameworks will be expected to set out a split between the two, based upon their GTAAs.
- 6.5 The number of caravans which can be accommodated per pitch varies. As the Caravan Count data records the number of caravans in Unauthorised Encampments an assumption must be made to establish the number of pitches required. It has been assumed here that each pitch will accommodate an average of 1.5 caravans, unless a completed GTAA indicates otherwise. Estimated pitch requirements have been rounded up to whole pitch numbers.

- 6.6 The Caravan Count is a snapshot survey undertaken on 2 days per year. It should be regarded as the absolute minimum requirement which underestimates total need. This is because it does not take into account hidden need e.g. site waiting lists, projected need based upon current or anticipated family growth, and gypsies and travellers who have moved into housing because of the lack of availability of sites. For example, anecdotal evidence has been provided of 6 caravans occupied by the grown-up children of housed travellers which are currently sited in their parents' gardens in Leicester. Such individuals' needs are not captured in the Caravan Count.
- 6.7 Local GTAA's will take such factors into account as well as qualitative aspects of need and choice. They are expected, therefore, to identify considerably higher pitch requirements. They should also take account of the needs of travelling showmen and circus people travelling together, who are within the scope of guidance provided for GTAA's<sup>i</sup> but are excluded from the definition provided in Circular 01/06<sup>ii</sup>. Notwithstanding this difference it is proposed that where GTAA's identify a need for pitches for showmen it is appropriate for Local Development Frameworks to make appropriate provision.
- 6.8 It is estimated, therefore, that pitch requirements derived from robust GTAA's may be at least double those based upon Count Data. Whilst this is arbitrary it is cautious: for one of the few local authorities to have already provided data derived from a Needs Assessment, need is estimated at up to 20 residential pitches plus up to 5 transit pitches, compared to a Caravan Count average of 2 caravans.

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<sup>i</sup> "It should be noted that travelling showmen and circus people travelling together as such are not excluded from this definition, and where there is a need for winter quarters for this group, it may make sense for local authorities to assess this need as part of the Gypsy and Traveller accommodation assessment as many of the issues will be similar." Para 25 GTAA Draft Practice Guidance, ODPM.

<sup>ii</sup> "For the purposes of this Circular "gypsies and travellers" means "*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such.*" Para 15, OPDPM Circular 01/06

## Appendix 1

### Glossary

Acronym	Meaning
AONB	Area of Outstanding Natural Beauty
DCLG	Department for Communities and Local Government
dpa	Dwellings per annum
EiP	Examination in Public
EMRA	East Midlands Regional Assembly
GTTAs	Gypsy and Traveller Accommodation Assessments
HMA	Housing Market Area
LA	Local Authority
LDF	Local Development Framework
LPA	Local Planning Authority
LRC	Leicester Regeneration Company
MARR	Mansfield/Ashfield Regeneration Route
MKSM	Milton Keynes South Midlands (Sub Regional Strategy)
NEMA	Nottingham East Midlands Airport
NET	Nottingham Express Transit
NIA	Northampton Implementation Area
ODPM	Office of the Deputy Prime Minister
PUA	Principal Urban Area
RELS	Regional Employment Land Supply Study
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SFRA	Strategic Flood Risk Assessment
SRA	Strategic Regeneration Area
SRS	Sub Regional Strategy
SSP	Sub-Regional Strategic Partnership
UE	Unauthorised Encampment
URC	Urban Regeneration Company

## Appendix 2

### List of Studies

- Revised Retail Capacity Assessment (June 2005)
- East Midlands Carbon Footprint – Determining Baseline Energy Consumption Data (June 2006)
- East Midlands – Regional Targets and Scenarios for Renewable Energy (June 2006)
- Waste Planning Guidance (August 2006)
- An Approach to Affordable Housing to Inform the East Midlands Regional Plan - Final report from the Cambridge Centre for Housing and Planning Research (August 2006)
- Identifying the Sub-regional Housing Market Areas of the East Midlands (April 2005)
- Profile Information for Housing Market Areas in the East Midlands – Final Report (March 2006)
- Housing Technical Paper (September 2006)
- Regional Employment Land Study (September 2006)
- Regional Flood Risk Appraisal (July 2006)
- Spatial Review of Water Supply and Quality in the East Midlands (August 2006)
- The East Midlands Regional Plan: Reflecting Cultural Priorities (August 2006)
- East Midlands Regional Funding Allocation Advice (January 2006)
- Developing Regional Transport Funding Priorities for the East Midlands – Final Report (January 2006)
- Parking Standards Review – Final Report (September 2006)
- Green Infrastructure for the East Midlands: A Public Benefit Mapping Project (July 2006)
- Nottingham – Derby Green Belt Review (August 2006)
- Smarter Choices – Influencing Travel Behaviour in the East Midlands – Final Report (May 2006)
- Sustainability Appraisal Report (Full) (September 2006)