

**EAST MIDLANDS REGIONAL PLAN
RESPONSE TO CONSULTATION QUESTIONS
LEICESTERSHIRE COUNTY COUNCIL**

Housing Provision Question 1

Is there additional evidence on demographic and migration issues that you would like the Regional Assembly to consider as part of the Partial Review?

1. Even in times of economic growth the Leicester and Leicestershire HMA has failed to deliver against the Regional Plan housing target since 2001. This backlog of undersupply is exacerbated by the current economic situation and although the economic landscape in 2021 to 2031 is hoped to be more positive than today's, the effects of this are likely to be long term.
2. The latest NHPAU advice suggests a lower assumption on overseas migration levels. The provision in the project brief to extend the projections provided to EMRA by Manchester University to cover variant 2008-based projections, especially the effect of migration variants at HMA level, should be taken up.
3. Revisions to population and household estimates and projections resulting from the ONS review of migration figures at local authority level. Indications of the effects of this review are planned to be made available by ONS for consultation between Nov 2009 and Feb 2010, on the production of 2008-based sub-national projections. These projections are due to be published in May 2010, and will be based on revised estimates of demographic trends, including international migration at local authority level.
4. A review of household projections and estimates in the light of evidence of recent trends in household formation conflicting with projected figures.
5. Employment need and labour force supply balance, bearing in mind revised economic growth projections (needs) and policy changes in labour supply such as extensions to the period of working life.

Housing Provision Question 2

Is there evidence on affordability issues that you would like the Regional Assembly to consider as part of the Partial Review?

1. The recently completed Strategic Housing Market Assessment for Leicester and Leicestershire contains extensive data on affordability and should be taken into account. Further work on affordable housing viability is also being carried out at a district level and should be considered where available.
2. The assessment of housing supply should include transfers (acquisitions and rejuvenation of disused stock for social housing and transfers of social stock through right to buy).

Housing Provision Question 3

Is there any other evidence on housing issues that you would like the Regional Assembly to consider as part of the Partial Review?

1. Strategic decisions on the locations of future housing growth must take account of economic factors and ensure that there is an appropriate balance between new housing and employment land supply in order to achieve a sustainable pattern of development.
2. The provision of adequate infrastructure, particularly public transport services to accommodate major housing growth in the most sustainable locations will be an essential component of any delivery plans. The Leicester and Leicestershire HMA Growth Infrastructure Assessment (April 2009) provides a robust evidence base for the existing Regional Plan strategy to 2026.
3. The Leicestershire Older Persons Needs and Aspirations study, due for completion in March 2010, will provide further information from the Leicester and Leicestershire HMA. Emerging findings should be considered by the Regional Assembly as the study progresses.
4. The effect of second homes and buy-to-let on available housing.
5. Issues around rural housing provision, local need and affordability and the relationship (if any) between service provision and retention should be examined at the regional level.

Meeting Community Housing Needs Question 1

Which of the three main options outlined above should be used as the basis for setting targets for affordable housing provision for the period 2021-31 and why?

1. Option 3, but any future backlog of need should be included.

Meeting Community Housing Needs Question 2

What additional actions could the Regional Plan include to help maximise affordable housing delivery, particularly in smaller settlements in rural areas?

1. Support the maximisation of Section 106 contributions, by lowering thresholds for such contributions, in areas of high market demand.

Meeting Community Housing Needs Question 3

Should the Regional Plan provide guidance on the provision of specialist housing for older people, and if so what form should this take?

1. See conclusions from Older People's Housing Needs Study for EMRA.
2. A study has commenced looking at the needs and aspirations of older people in Leicester and Leicestershire. It is due to report at the end of March 2010.
3. Particularly in rural areas, provision of affordable housing should be based on clearly established local need. Development patterns that encourage people to move away from urban areas to more 'remote' rural locations are unlikely to be sustainable in transportation terms. A regional, evidence-based methodology to establish affordable housing needs would therefore seem to be the most appropriate approach.

Spatial Development Options Question 1

Are these the right types of spatial development options for the East Midlands?

1. The recent Cambridge University SOLUTIONS research indicates that none of the three alternative options considered by the research appears to offer any distinct transportation (and related environmental) advantages over the others. Notwithstanding this, a concern remains that there is a lack of evidence at a regional level in respect of the most appropriate spatial option. This is particular the case in respect of whether or not a new settlement might be the appropriate way forward. Restricting consideration of this issue to an HMA level imposes constraints that fetter proper consideration (e.g. consideration of a new settlement at the border of Leics, Notts and Derbys).

Spatial Development Options Question 2

Should any other spatial development options be considered for the Region? If so please explain and provide evidence to support these options.

1. It is not entirely clear whether the options put forward would embrace a 'corridor' approach if evidence demonstrated this to be the best approach.

Housing Market Area Question 1

Which of the four spatial planning and development options will best meet the needs of the HMA from 2021 and why?

1. Please see assessment in Appendix 1.

Housing Market Area Question 2

Should any other options be considered? If so please explain and provide evidence to support these options.

1. No.

Milton Keynes & South Midlands Question 1

Do you agree with the proposed approach to reviewing the MKSM Part A Statement set out above?

1. No comment.

Lincolnshire Coastal Study Question 1

In areas where there is a significant hazard to human life if flood defences fail, what measures should be taken to improve resilience to flooding and maintain the social and economic viability of local communities?

1. No comment.

Lincolnshire Coastal Study Question 2

In flood risk areas outside of the most hazardous locations, what scale of development would be appropriate to meet local economic and community objectives (such as affordable housing) and how could it be designed to be resilient to flooding?

1. No comment.

Lincolnshire Coastal Study Question 3

Should regionally significant development in the Coastal Lincolnshire and Peterborough Partial HMAs be focused outside of the identified flood risk areas, and if so where?

1. No comment.

Transport Question 1

Do the regional level outcomes set out above provide a sound basis for the review of the Regional Transport Strategy?

1. Generally yes, although they are somewhat generic.
2. It is also necessary to know the potential strategic growth locations and associated dwelling numbers to be able to give evidence based advice. Additional transport studies will be required to provide a sound evidence based approach before an assessment of the transport implications of any proposal can be undertaken with any confidence.

Transport Question 2

Do the regional level challenges set out above provide a sound basis for the identification of regional transport investment priorities?

1. The County Council has been involved in the DaSTS (Delivering a Sustainable Transport System) work that has led to the identification of the challenges, and in general terms it supports them. However, in the context of the Regional Plan there are two issues of concern:
 - There still appears to be a lack of strategic linkage between the RTS and the RSS. The Ptolemy work that EMRA has commissioned will not fully provide an evidence-based comparison of the housing spatial options put forward for consultation, and it is not clear how the comparative implications of the options in terms of helping to meet the challenges is to be demonstrated.
 - Determination of funding priorities might also be driven by housing and economic growth considerations. With an ever-tighter funding situation, it may eventually prove necessary to concentrate funding in areas that can deliver the most growth and/or most quickly. The challenges are still then likely to have a role in terms of identifying the types of schemes appropriate to support growth and in determining the priority order of those schemes.

Transport Question 3

Is the proposed structure for the revised Regional Transport Strategy sound and fit for purpose?

1. See comments above.

Renewable & Low Carbon Energy Generation Question 1

What is the most appropriate mix of renewable and local carbon energy generation for the East Midlands as a whole and why?

1. Reference in question is presumably to low carbon not local carbon.
2. The important thing is to provide the right conditions for developers to come forward with appropriate schemes which help to minimise carbon emissions. The challenge for the East Midlands in meeting Climate Change targets is likely to require a range of options to be explored and supported.

Renewable & Low Carbon Energy Generation Question 2

What is the most appropriate strategy for carbon emissions reduction in each of the Region's 10 Housing Market Areas and why?

1. Note that a reduction through the strategy is probably not achievable unless the strategy is able to find some mechanism to fund the retrofitting of energy efficiency measures into the existing stock of buildings – possibly through a Community Infrastructure Levy payment. What it can also do is ensure that:
 - All new buildings are as energy efficient as possible as soon as possible;
 - Conditions are sympathetic for incorporation of low carbon and renewable energy embedding in such development (through a “Merton” type policy) and within the Region generally;
 - Policies achieve sustainable communities which minimise the need to travel and require high standards of service by sustainable forms of travel (public transport, cycling and walking).

Renewable & Low Carbon Energy Generation Question 3

How can heat from electricity generation be used to meet local heating requirements and how can this be delivered most effectively?

1. Given that this has not happened in a voluntary environment, the Region would have to be prepared to make it a requirement of all new development either through a general “Merton” policy requirement (in which case developers can sort out for themselves the most effective means of achieving the required percentage of ‘embedded’ energy consumption) or through a specific requirement for developments which are close to heat sources, although it may be difficult to establish a fair price in such a compulsory setting.

Aggregates Apportionment Question 1

In the absence of revised national guidance on regional apportionment figures for the period up to 2021, should minerals planning authorities 'roll forward' the current regional apportionment from 2016 to 2021 to provide a basis for Local Development Framework preparation, as has already happened in some areas? If not, what other methodology should be used and why?

1. Revised National and Regional Guidelines for Aggregates Provision in England for the period 2005–2020 were published in June 2009. These figures should now form the basis for the sub-regional apportionment.

Aggregates Apportionment Question 2

In any future sub-regional apportionment based on revised national figures up to 2021, should the Region continue to plan for a progressive reduction in aggregates and other land won minerals from the Peak District National Park and the Lincolnshire Wolds AONB as set out in Policy 37 of the Regional Plan?

1. It is not possible to comment until the implications have been assessed and the existing policy has had the benefit of a meaningful period of monitoring. Planning for the reduction in aggregate production from the Peak District National Park and the Lincolnshire Wolds AONB should be one of the options examined in the sub-regional apportionment exercise.

Aggregates Apportionment Question 3

In any future sub-regional apportionment based on revised national figures up to 2021, should levels of past production continue to be the primary basis for determining provision outside the Peak District National Park and the Lincolnshire Wolds AONB? If not, what other methodology should be used and why?

1. It is not possible to say whether past production should be the primary basis for determining future provision until the implications of this and other options have been assessed. Other possible options could be based on existing apportionments (to provide baseline for comparison); future patterns of growth; and environmental constraints.