

# Greater Nottingham Aligned Core Strategies

## HOUSING PROVISION POSITION PAPER

JULY 2011



## **WHAT THIS PAPER DOES:-**

- **Explains the current position with regard to housing provision figures in the draft Aligned Core Strategies.**
- **Describes the further work that the partner Councils commissioned to test those housing provision figures, and presents the findings of that work.**
- **Explains the different approaches being taken by Ashfield District Council and Rushcliffe Borough Council.**
- **Explains why Broxtowe, Erewash and Gedling Borough Councils and Nottingham City Council think the draft Aligned Core Strategies housing provision figures are still the most appropriate figures to plan for.**
- **Presents 'rebased' housing provision figures, updating the draft Aligned Core Strategies figures (which covered the period from 2009 to 2026) to figures which cover the period from 2011 to 2028.**
- **Explains the Councils' approach to the distribution of housing within their areas (the Principal Urban Area/Non Principal Urban Area split).**
- **Explains which locally distinct matters each Council is also seeking views on, and points to where further information is available.**

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## **1 INTRODUCTION**

1.1 The councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe have been working with Derbyshire and Nottinghamshire County Councils to prepare a new aligned and consistent planning strategy for Greater Nottingham, known as the Greater Nottingham Aligned Core Strategies. They have also been working with Ashfield District Council to ensure alignment with the Hucknall part of Ashfield. Ashfield are separately considering housing options across the whole of their District, and will be publishing the outcome of this work in due course.

1.2 All the partner Councils agreed to consult on an 'Option for Consultation' draft of the Aligned Core Strategies which amongst other matters, set out the amount of new housing each Council would provide between 2009 and 2026, based on the Regional Strategy (East Midlands Regional Plan 2009). The draft Aligned Core Strategy was published in February 2010. Ashfield District Council also published a 'Preferred Option' Core Strategy on March 2010.

1.3 The coalition Government have made it clear that Regional Strategies will be revoked, and the Localism Bill will enable this to happen when it comes into force, which is expected to be towards the end of 2011 (a Strategic Environmental Assessment will also be required). The Bill will also promote a more 'localist' approach to planning, with the introduction of Neighbourhood Plans, and an expectation that local communities will be more closely involved in the planning process. Alongside these changes, the Government has published new 2008-based Household Projections. These replace the 2004-based projections which were used in the preparation of the Regional Strategy. The Government had also previously published 2006-based Household Projections, but these were not used for plan making in Greater Nottingham.

1.4 As a result, the councils have collectively decided to review the housing figures in the draft Aligned Core Strategies, to assess whether they remain an appropriate basis for planning for housing. This paper sets out the findings of that review, explains the approach being taken by Broxtowe, Erewash, Gedling and Nottingham City Councils, and the different approach being taken in Rushcliffe, and sets out the next steps the councils will take in progressing the Aligned Core Strategies.

## **2 BACKGROUND TO REVIEWING HOUSING PROVISION**

### **Government Guidance for Planning for Housing**

2.1 Although the Government is to revoke Regional Strategies, meaning that in the future decisions on housing numbers will be made by the district and city councils, it has also made it clear that more new homes need to be built, and that for some councils, the Regional Strategy housing numbers may be their preferred approach.

2.2 Recent guidance also states that plans for new housing should be based on reliable information, and that councils will have to defend and justify them during the Local Development Framework (LDF) examination process, in line with current Government policy in Planning Policy Statement 3 “Housing” (PPS3).

2.3 PPS3 sets out the information which the Councils, working together, need to take into account in preparing plans for new housing.

2.4 These include:

- Evidence of current and future levels of need and demand for housing and affordability levels, set out in Strategic Housing Market Assessments and other relevant market information;
- The Government’s latest published household projections and the needs of the regional economy;
- Evidence of the availability of suitable land for housing using Strategic Housing Land Availability Assessments and other information;
- The Government’s overall ambitions for affordability, including the need to improve affordability and increase housing supply.
- A Sustainability Appraisal of the environmental, social and economic implications.
- An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.

2.5 The Government’s latest household projections are an important part of the evidence base, and it is normal practice for Inspectors at Examination to expect strong justification if councils wish to depart significantly from the levels of housing provision suggested by them.

### **The Government’s Household Projections**

2.6 Household projections are produced by applying projected household formation rates<sup>1</sup> to the population projections published by the Office for National Statistics. The assumptions underlying national household and population projections are demographic trend based.

2.7 They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. They provide the household numbers and structures that would result assuming that trends happening over the past 5 years will continue into the future. The 2008 based projections cover the period to 2033.

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<sup>1</sup> Household Formation Rates are the rate at which the number of new households form due to increased population through more births than deaths and in-migration, marital break up, people getting married later in life, and an aging population. For planning purposes, it is assumed that all new households will require a home of their own.

2.8 Past Examinations in Public of structure plans and regional strategies have highlighted issues around using household projections to determine future housing provision. Central to this is the fact that the projections are not forecasts of what will happen, they show what would happen if past trends continue. They project forward what has happened over the past 5 years, over a 25 year period. If trends over the past 5 years are abnormal in any way, this will be exacerbated in the projections. For instance, it has been argued by objectors that the five year period used reflects a time of particularly high in-migration which is unlikely to be continued over the long term, and thus the projections overstate the number of homes needed over the projection period.

### **3 PROPOSED HOUSING PROVISION AND THE 2008-BASED HOUSEHOLD PROJECTIONS**

#### **Comparing the Household Projections with the Draft Aligned Core Strategies**

3.1 The 2008-based Household Projections were published in November 2010. In order to test this new evidence against the housing provision of the draft Aligned Core Strategies (which was based on the Regional Strategy, which used 2004-based Household Projections), as a first step, these projections were compared to the housing provision set out in the Option for Consultation draft of the Aligned Core Strategies.

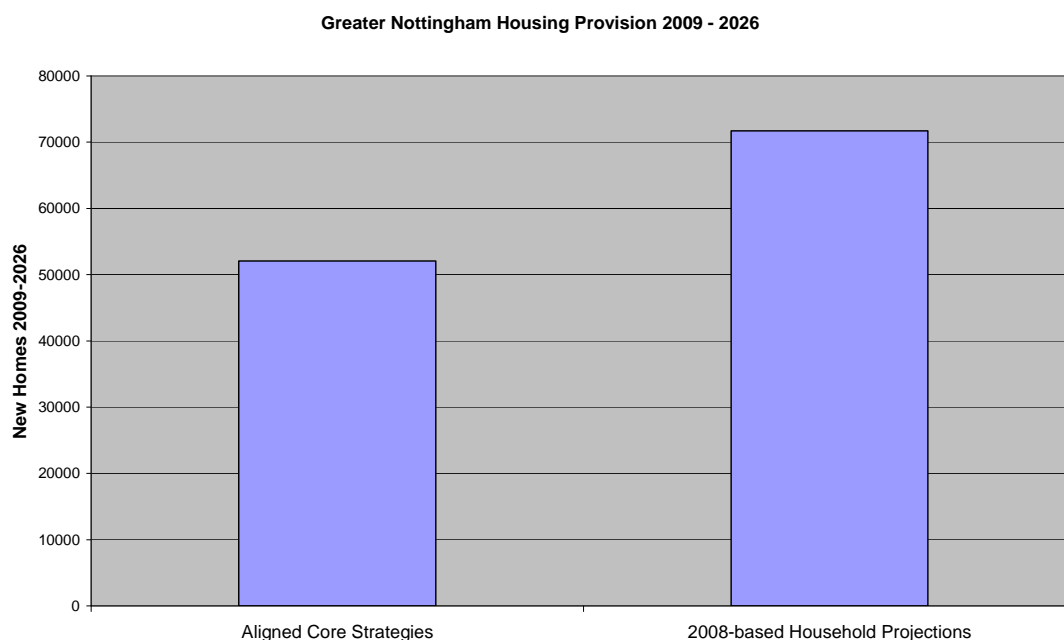
3.2 The comparison has been undertaken over the whole of Greater Nottingham rather than for the individual council areas within it because it is recognised that the area acts as a single housing market, which is not reflected by the administrative boundaries of the councils. In particular, Nottingham City is recognised as the source of a significant number of new households, which due to its tight boundaries cannot all be accommodated within it. The figures below therefore include the Hucknall part of Ashfield District<sup>2</sup>, the boroughs of Broxtowe, Erewash, Gedling and Rushcliffe, together with Nottingham City.

3.3 To allow comparison with existing housing figures used in the draft Aligned Core Strategies, the end period of the projections was adjusted to 2026. Without making any other adjustments to the projections, the 2008-based projections imply a new housing provision requirement for Greater Nottingham of **71,700**, an increase over the draft Aligned Core Strategies figure (52,050) of **19,650**, or **27.4%**. This is shown in graph 1 below.

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<sup>2</sup> Only the Hucknall part of Ashfield is included in the Aligned Core Strategy. The Council has not yet made a decision regarding the level or distribution of housing between the Hucknall area and the rest of the District, and this analysis therefore assumes the Hucknall provision is at Aligned Core Strategy levels.

**Graph 1 Housing provision implied by 2008-based Household Projections**



3.4 Put simply, this would mean that if the 2008-based Household Projections were used as the basis for planning for housing provision in Greater Nottingham, additional sites would have to be found to accommodate an extra 19,650 new homes.

3.5 This extra provision would involve significant further release of greenfield sites, since brownfield options have already been considered through the Aligned Core Strategy preparation process. The increased scale of development would also imply impacts on the provision of employment, infrastructure and supporting facilities, which in turn would require the evidence base sitting behind the draft Aligned Core Strategies to be revisited, leading to considerable delay. Additionally, it implies a step-change in housing delivery over and above that achieved even throughout the years of buoyant housing market conditions. Given the current low rates of housing completions in Greater Nottingham, the capacity to deliver this level of housing is questionable.

### **Testing the 2008-based Household Projections**

3.6 In order to understand how decisions on levels of housing provision might impact on population trends, the economy and house building rates, all the partner councils agreed to commission further analysis of the data. A brief for the work was prepared, and all the councils were given the opportunity to input into this. The work was commissioned by a partnership of Derby, Derbyshire, Nottingham and Nottinghamshire councils.

3.7 This work on the projections comprised looking at four 'scenarios', chosen to aid understanding of how different factors influence housing provision, with the aim of achieving a shared understanding of the impacts of different levels of housing provision will have on the economy and population make up.

3.8 The four scenarios were:-

Scenario 1 – Natural change in the existing population

Scenario 2 – in and out migration in balance (net nil migration)

Scenario 3 – No increase in jobs

Scenario 4 – Continuing past house building rates

3.9 A further scenario, testing the difference made by taking a longer term period of migration trends was also commissioned, to test the argument that projecting short term migration rates over a longer period led to artificially high housing provision figures. This is not included here, as the difference between this scenario and the 2008-based Household Projections was very small, showing that in-migration has been high over the longer term.

3.10 The scenarios, and the outcome of the modelling work are described in more detail below. Again, the projections have been adjusted to tie in with the draft Aligned Core Strategies period (2009-2026), and the analysis covers the whole of Greater Nottingham (see paragraph 3.2 above).

### **Scenario 1 – Natural change in the existing population**

3.11 This scenario examines the housing requirements of the existing population only, assuming no one moves in to, or out of, the area. Although this assumption is not realistic, this scenario shows the future housing needs of the existing population, and shows the additional housing required due to more births, people living longer, and the decline in average household size, due to divorce and more people living alone.

### **Scenario 2 – Balanced migration (net nil migration)**

3.12 This scenario shows the housing figures required if in-migration and out-migration were in balance and cancelled each other out. This varies from the 'Natural Change' scenario, because the ages of those migrating out from the area are different from those migrating in, the resulting housing needs can be quite different.

3.13 Greater Nottingham currently experiences significant in-migration from younger people for work, and study (who tend not to have families and to live in larger households). This, together with out migration of older people (who are more likely to have families), gives rise to fewer households than 'natural change'; It also has implications for the economy; as younger people tend to



be more economically active, so an increase in the proportion of younger people would increase the potential labour force.

3.14 This scenario is similar to assumptions used in past structure plans for Nottingham and Nottinghamshire. It also has a precedent. During the early 1990s south Nottinghamshire (Greater Nottingham minus Erewash) experienced a period of balanced migration, with out-migration later in that decade.

### **Scenario 3 – No increase in jobs**

3.15 This scenario shows the housing figures needed even if the number of jobs is held at the 2008 base date level over the projection period. It is designed to show the implications that decisions about the housing provision levels might have on the future economic prospects for Greater Nottingham.

3.16 It is a little more complex than the other scenarios, because some other assumptions have had to be made:

- It assumes the rates of economic activity and the unemployment rate of people already living in Greater Nottingham stays the same.
- It assumes that the proportion of workers commuting into and out of the area will remain the same as in the past,.

### **Scenario 4 – Continuing past house building rates**

3.17 This scenario takes the average number of new homes built each year in the last 10 years (April 2000 to March 2010), ie about 2,500 homes per year and assumes that rate continues into the future. It takes no account of the future needs of the population.

3.18 The figures used are net, meaning that any demolitions have been taken off the totals.

3.19 By comparing it with other scenarios, this will show whether carrying on building homes at the same rate as we have in the past will lead to out-migration or allow for in-migration, and also allow for some analysis of the consequences for the economy.

### **Results of the Modelling**

3.20 Table 1 and graph 2 below show the outcome of the modelling work as compared to the level of housing provision currently in the draft Aligned Core Strategies, and that implied by using the 'unadjusted' 2008-based household projections.

**Table 1 Greater Nottingham housing provision resulting from the scenario modelling**

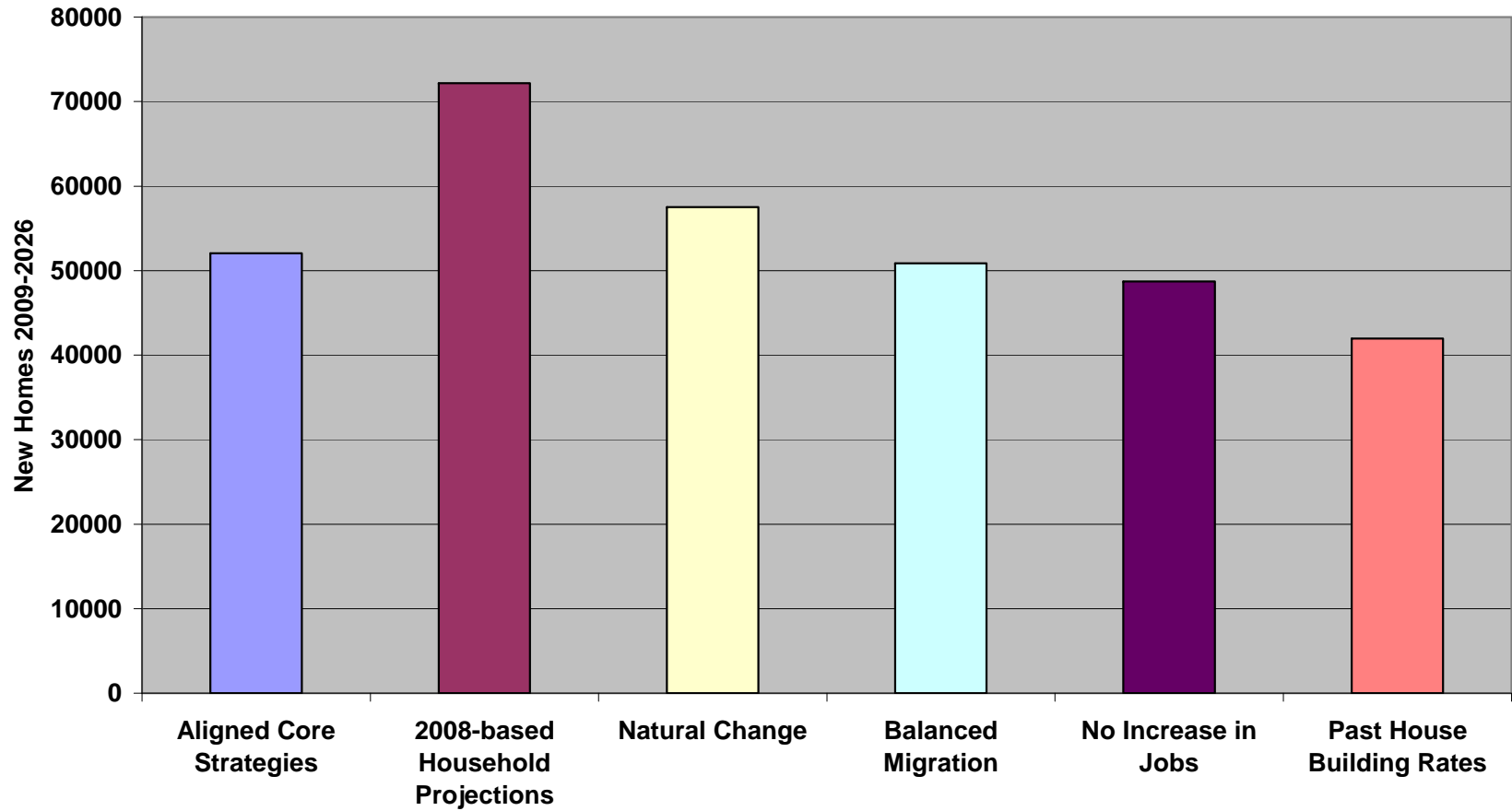
	<b>Scenario</b>	<b>Total 2009-2026</b>	<b>Difference between Scenarios and 2008-based Household Projections</b>
	<b>Option for Consultation Aligned Core Strategies</b>	<b>52,050</b>	<b>-19,650</b>
	<b>2008-based Household Projections</b>	<b>71,706</b>	<b>n/a</b>
<b>1</b>	<b>Natural Change in Existing Population</b>	<b>57,717</b>	<b>-13,989</b>
<b>2</b>	<b>In and out Migration in Balance</b>	<b>51,021</b>	<b>-20,685</b>
<b>3</b>	<b>No Increase in Jobs</b>	<b>44,444</b>	<b>-27,262</b>
<b>4</b>	<b>Continuing Past House Building rates</b>	<b>41,888</b>	<b>-29,818</b>

3.21 When compared with the 2008 based Household Projections, the 4 scenarios show a wide variation in housing provision for Greater Nottingham, from 71,700 (2008-based Household Projections) new homes to 41,800 (Past House Building Rates). As previously stated, the Projections are based on past trends. The period over which these past trends occurred was 2003 to 2008, and thus pre-date the current recession.

3.22 The Natural Change scenario shows the housing provision required by the existing population, assuming no one moves in or out of the area. It is therefore not realistic, but it does show that quite a significant level of new homes (57,700) would be required to simply meet the needs of the existing population. Although not as high as the 2008-based Household Projections, just providing for the housing need of the existing population implies a higher level of provision than that in the current draft Aligned Core Strategies, and more homes than currently being built.

**Graph 2 Greater Nottingham housing provision resulting from the scenario modelling**

**Implied Greater Nottingham Housing Provision 2009-2026**



3.23 The Balanced Migration scenario implies a slightly lower housing provision than the Natural Change scenario, at 51,021 new homes. This is because the housing needs of people moving into Greater Nottingham are different from those moving out, as described in paragraph 3.14 above. This scenario is considered to be more realistic than the Natural Change scenario, because it does allow for population movement. Although Greater Nottingham has experienced in migration in recent years, the scenario does reflect the position of past Nottingham and Nottinghamshire Structure Plans, and the reality of the situation in south Nottinghamshire in the 1990's. It is very close to the housing provision set out in the current draft Aligned Core Strategies. When compared to the No Increase in Jobs scenario, it also allows for growth in the level of jobs in Greater Nottingham over the period.

3.24 The No Increase in Jobs scenario is included to show what implications decisions on housing provision have for the economy, bearing in mind the assumptions set out at paragraph 3.16 above.

3.25 This scenario shows very clearly that providing fewer than 44,450 new homes would have implications for the economy of Greater Nottingham, which in a worst case could include fewer jobs. Although it does not necessarily mean that the economy would shrink, as job growth could also be supported through in commuting from outside Greater Nottingham, or higher economic activity rates/lower unemployment in the existing population (see paragraph 3.16), it is not considered an appropriate option given the economic aspirations of the councils making up Greater Nottingham. It is worth noting that all of England's 8 Core Cities (of which Nottingham is one) have experienced job growth over the past decade, and as drivers of their region's economy, this is expected to continue. Areas which have experienced job decline include Stoke, Blackpool and the Wirral.

3.26 Both the Natural Change and the Balanced Migration scenarios provide for some 'headroom' in terms of job growth, and would therefore be more appropriate in terms of providing for economic growth given these aspirations.

3.27 The final scenario, Past House Building Rates, shows the level of housing provision implied by continuing with the rate of house building that has occurred over the past 10 years (2000 to 2010). It results in the lowest housing provision of all the scenarios, at 41,888 new homes. Indeed, this is lower than the No Increase in Jobs scenario, and would therefore potentially be harmful to the Greater Nottingham economy. It would also provide for fewer homes than required by the Balanced Migration scenario, meaning out-migration from Greater Nottingham, and/or more in-commuting. In addition, the current level of completions is likely to have contributed to the existing affordability problems experienced in some parts of Greater Nottingham.

3.28 The scenario does however show what has been achieved over the longer term, including a period of strong housing delivery in buoyant market conditions as well as the more depressed current housing market. It does therefore give an indication that achieving significantly higher levels of new homes could be challenging. In particular, the levels of housing provision

implied by the 2008-based Household Projections would require a 71% increase in housing delivery over past rates. Whilst it would be reasonable to expect a significantly higher level of delivery given the availability of good quality housing sites and a return to improved market conditions, achieving this rate of housing delivery is not considered to be realistic.

3.29 The other scenarios require an uplift in housing delivery in the following approximate proportions; Natural Change 38%; Balanced Migration 22%; and No Increase in Jobs, 6%. Our expectations for the draft Aligned Core Strategies was an uplift over the long term delivery rate of about 24%, and it is worth noting that for some years during peak market conditions, annual housing delivery in Greater Nottingham was sufficient to deliver the level of housing set out in the draft Aligned Core Strategies.

## **4 PROPOSED LEVEL OF HOUSING PROVISION**

4.1 In order to progress the Aligned Core Strategies to adoption, the councils need to confirm a housing provision figure which is justified by the evidence available to it. The scenarios described above are helpful in understanding the evidence, and the implications of decisions about the level of housing provision.

4.2 Given the economic aspirations of the Government, the Councils, and the newly formed Local Enterprise Partnership for Derby, Derbyshire, Nottingham and Nottinghamshire, the No Increase in Jobs scenario is considered to provide for too few homes, albeit that other factors could still provide for more jobs with the same level of housing provision (see Paragraph 3.16). This also means that Past House Building Rates scenario provides insufficient homes.

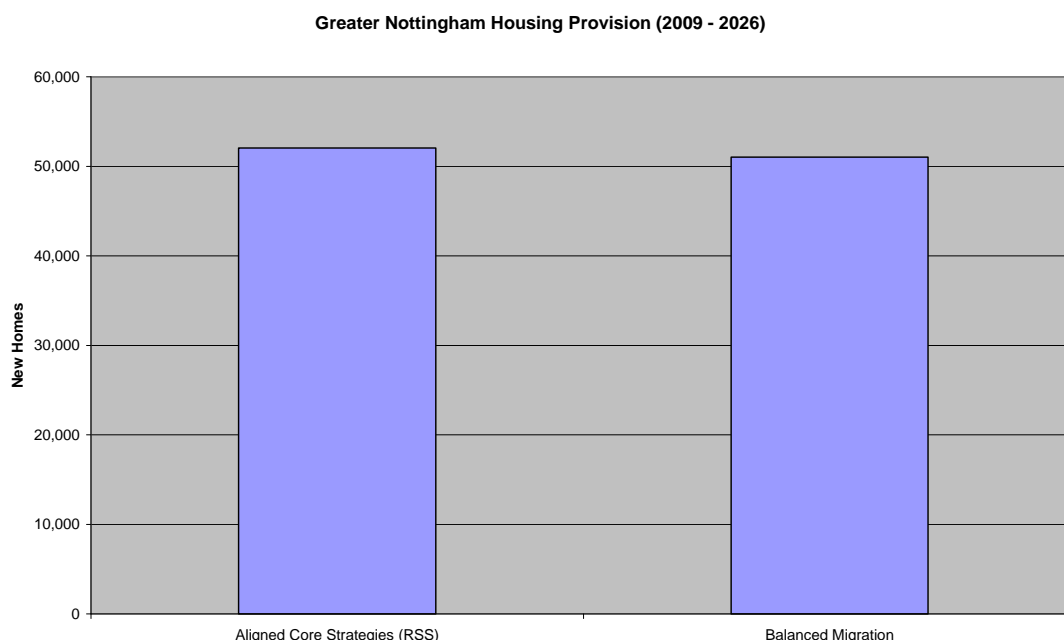
4.3 Equally the scale of new homes implied by the 2008-based Household Projections is considered to be unrealistic in terms of its delivery, it simply is not considered possible to build this number of new homes over the Aligned Core Strategy period. It would also lead to significant further greenfield development, and require the evidence base of the draft Aligned Core Strategies to be revisited, and therefore in turn require further consultation (effectively starting the process from scratch), which would lead to further delay in getting a planning framework into place.

4.4 It has already been noted that the Natural Change scenario is not realistic, and therefore it cannot form the basis of planning for future housing requirements.

4.5 However, the Balanced Migration scenario is very close to the housing provision already included in the draft Aligned Core Strategies (see graph 3 below), and this order of housing provision provides sufficient new homes to allow for economic aspirations in terms of jobs growth. This scenario is therefore considered to support the existing level of housing provision set out

in the draft Aligned Core Strategies as an appropriate target to plan for in Greater Nottingham.

### Graph 3 – Draft Aligned Core Strategies and Balanced Migration Housing Provision



4.6 This is not to under-estimate the challenge of delivering this level of new homes. The rate of uplift required over past delivery is still 24%, so even with a supply of new sites, successfully implementing the Aligned Core Strategy level of housing provision relies on an early return to improved housing market conditions, and a pro-active partnership approach to implementation and regeneration on behalf of the councils. Given past experience, achieving this delivery will be challenging, but achievable over the lifetime of the Aligned Core Strategies.

4.7 The comments made above about the significant step change in delivery required to meet the Aligned Core Strategy housing figures mean that proposing even higher levels of provision is not considered to be tenable in terms of delivery, added to which the weight of public opinion expressed through consultation exercises, which came out forcefully in favour of lower growth figures, would be further strengthened if even higher provision levels were to be proposed. Higher levels of housing provision would also require further testing against infrastructure and environmental capacity meaning large parts of the evidence base would have to be re-worked. This in turn would put back the implementation of the Aligned Core Strategies, and therefore put at risk its strategy and the early delivery of the housing already being planned for.

4.8 It should also be noted that housing delivery in Greater Nottingham will be closely monitored to ensure the Aligned Core Strategy is delivered, and it

is subject to review after 5 years, or earlier if monitoring indicates that the strategy is not being met.

## **5 COUNCILS APPROACH TO HOUSING DISTRIBUTION**

5.1 Whilst all the Councils agree that this review of the evidence supports the level of housing provision set out in the draft Aligned Core Strategies, they have not reached agreement on how it should be distributed around Greater Nottingham.

### **Broxtowe, Erewash, Gedling and Nottingham City Councils' Position**

5.2 Broxtowe, Erewash, Gedling and Nottingham City Councils have concluded that the housing distribution between those councils, as proposed through the draft Aligned Core Strategies, is supported by the available evidence, and is therefore an appropriate distribution to plan for (see Table 2 below). Their approach is based on the previous work and consultation undertaken on the draft Aligned Core Strategies, including the 'Appraisal of Sustainable Urban Extensions Study' (2008) and the 'Greater Nottingham Sustainable Locations for Growth Study' (2010). The councils consider that as the origin of this distribution is the Regional Spatial Strategy, which at the time of writing is still part of the Statutory Development Plan, this approach is more likely to be found "sound" at Examination for the simple reason that it is a well established, studied and substantially unchallenged figure as regards its legal status. No other method of calculation of housing need could be said to possess those virtues and were any other method to be used, it is very possible that a legal challenge to its application could ensue.

**Table 2 – Draft Aligned Core Strategies Housing Distribution in Greater Nottingham**

	<b>Option for Consultation Aligned Core Strategy Housing Provision 2009-2026</b>
<b>Hucknall</b>	2,989
<b>Broxtowe</b>	5,765
<b>Erewash</b>	5,932
<b>Gedling</b>	7,053
<b>Nottingham City</b>	16,450
<b>Rushcliffe</b>	13,860
<b>Greater Nottingham</b>	52,049

## **Rushcliffe Borough Council Position**

5.3 All the councils have worked together to ensure the policies of the draft Aligned Core Strategies are consistent across Greater Nottingham. However, Rushcliffe Borough Council want to take a different approach to determining housing figures for their Borough, and are therefore undertaking a separate exercise to determine an appropriate number of new homes to plan for. This exercise is due to conclude in late summer, and depending on the level of provision proposed by Rushcliffe Borough, the councils will then collectively decide whether it is practical to proceed with a single Aligned Core Strategy for Greater Nottingham, or whether it would be more appropriate for Rushcliffe to publish a separate document. Apart from the housing issues, this would be likely to have a high degree of alignment in all other respects.

## **Ashfield District Council Position**

5.4 As previously stated, only the Hucknall part of Ashfield district falls within Greater Nottingham. Ashfield District Council will be determining the appropriate level and distribution of housing around the District, and are intending to take forward their core strategy in the Autumn.

## **6 RE-BASING THE HOUSING PROVISION FIGURES**

6.1 The Option for Consultation version of the Aligned Core Strategies covered the period from 2009 to 2026. Government guidance states that Core Strategies should plan for a period of at least 15 years from adoption. The Aligned Core Strategies are expected to be adopted in late 2012. It is therefore considered prudent to plan for the period until 2028. As housing completion figures are now available for 2009/10 and 2010/11, it is proposed that the Aligned Core Strategies cover the period from 2011 to 2028.

6.2 The housing provision figures therefore need to be rolled forward for two years, and the housing completion rates for 2009/10 and 2010/11 removed from the total. Housing completions have been at a low level over the past few years, due to the recession and the depressed condition of the housing market. Housing completions have not therefore been at the level envisaged by the draft Aligned Core Strategies, and as a result the total housing figure for the new period has increased slightly above the figure in the Option for Consultation version of the Aligned Core Strategies, despite both time periods being 17 years.

6.3 Due to the different approaches being taken in Ashfield and Rushcliffe, the new housing provision figures have been assessed for Broxtowe, Erewash, Gedling and Nottingham City Council areas only. The proposed new housing provision figures are worked out as follows:-



Greater Nottingham Aligned Core Strategy Option for Consultation (2009-2026) housing provision figure: 52,050

Of which the figure for Broxtowe, Erewash, Gedling and Nottingham City is: 35,200

Using this figure as the starting point, the Table 3 (below) summarises the proposed new housing provision figures.

**Table 3 Revised 2011-2028 housing provision figures for Broxtowe, Erewash, Gedling and Nottingham City Councils (Derived by rolling forward the provision set out in the draft Option for Consultation Aligned Core Strategy)**

<b>Column A</b>	<b>B</b> Current housing provision 2009-2026 (Draft Aligned Core Strategy)	<b>C</b> Implied annual average delivery 2009-2026	<b>D</b> Housing provision 2009-2028	<b>E</b> Net completions 2009/10	<b>F</b> Net completions 2010-11	<b>G</b> <b>New Housing provision 2011-2028</b>	<b>H</b> Implied annual average delivery 2011-2028	<b>I</b> Difference between 2009-2026 and 2011-2028
			=B+(2xC)			=D-(E+F)		=G-B
<b>Broxtowe Borough Council</b>	5,765	339	6,443	95	222	<b>6,126</b>	360	361
<b>Erewash Borough Council</b>	5,932	349	6,630	193	223	<b>6,214</b>	366	282
<b>Gedling Borough Council</b>	7,053	415	7,883	274	341	<b>7,268</b>	428	215
<b>Nottingham City Council</b>	16,450	968	18,385	909	311	<b>17,165</b>	1,010	715
<b>TOTAL</b>	35,200	2,071	39,341	1,471	1097	<b>36,773</b>	2,163	1,573

Totals may not sum due to rounding.

Columns E and F are net figures, with demolitions subtracted (this particularly affects the City Council's figures).

For comparison, Table 1 and Graph 2 in section 3 show the housing provision (2009-2026) that would be implied by the 2008-based Household Projections, at a Greater Nottingham level, compared to that in the draft Aligned Core Strategies.

## **7 DISTRIBUTION OF HOUSING WITHIN COUNCIL AREAS**

7.1 The Regional Strategy requires that of 52,050 dwellings to be provided each year in Greater Nottingham, at least 35,197 of these should be within or adjoining the Nottingham Principal Urban Area (PUA - the main built up area of Nottingham), with much of the remainder directed towards specific named settlements. The Localism Bill will abolish the Regional Strategy when it becomes law, and notwithstanding the coalition government's consistent statements and emerging policies regarding the importance of housing delivery, they have also been consistent in indicating that the locations where individual councils can choose to provide land for housing will be largely up to them.

7.2 The borough councils of Broxtowe, Gedling and Rushcliffe strongly and consistently opposed the rigidity of the PUA / non PUA split proposed by the Regional Strategy, which dictated in numerical terms how housing growth should be distributed within their administrative areas. (Erewash were not as opposed to this as the Regional Strategy set a significantly lower PUA threshold allowing the majority of their growth to be directed towards the sub regional centre of Ilkeston).

7.3 Each borough council considers that as the local authority it is they who are in the best position to identify how the required new housing is to be distributed within their areas, having regard in particular to the views of local communities together with national policy, Green Belt, sustainability, land availability and delivery issues. In addition, not all the relevant evidence now available was in place at the time of the Regional Strategy examination in 2007.

7.4 The consultation response to the February 2010 Option for Consultation Aligned Core Strategies, together with earlier rounds of consultation, demonstrated broad support for a more flexible approach to providing locations for new housing. This support was from a wide range of stakeholders ranging from promoters of new housing to members of local communities objecting to growth.

7.5 Further flexibility in housing distribution within the Boroughs is also supported by evidence in the Greater Nottingham Sustainable Locations for Growth Study (February 2010) which identifies numerous settlements outside of the PUA which are considered potentially suitable for more growth than may be supported with a rigid PUA/ non PUA approach. In addition the Sustainability Appraisal for the draft Aligned Core Strategies, whilst favouring a strategy of urban concentration, does not identify significant sustainability problems with higher levels of growth outside of the PUA and the named Sustainable Urban Extensions than that identified in the draft Aligned Core Strategies.

7.6 There is substantial technical evidence indicating the availability of land in sustainable locations outside of the Nottingham PUA. The emerging Sustainability Appraisal indicates a strategy of urban concentration in and

around Nottingham has sustainability benefits and it is proposed to continue with this strategy at a Greater Nottingham level, whilst allowing more flexibility than allowed by the Regional Strategy for individual councils to direct proportionate levels of new growth to settlements elsewhere within their area. This will allow the flexibility to provide the best prospect of ensuring a 5 and 15 year supply of housing land as required by Planning Policy Statement 3 'Housing' and will ensure Councils can take decisions to direct appropriate growth to settlements that may, for example, be in need of further investment on regeneration grounds or in order to provide much needed support for local facilities. As well as being in line with the Government's 'Localism' approach to making decisions, providing a broader spread of housing locations may well also assist in speeding up the rate of housing delivery overall.

7.7 Given that numerous earlier rounds of consultation have given adequate opportunity to influence the emerging Aligned Core Strategies, it is now proposed to retain a strategy of concentrating new housing provision in and around the built up area of Nottingham, and to include district housing provision targets, but without the distribution of this being bound in percentage or numerical terms within each council area.

## 8 NEXT STEPS

8.1 Comments received on the Housing Position Paper, and consultation responses on the draft Climate Change Policy and on the locally distinctive matters will be considered and taken into account in the drafting of the next 'Publication' version of the Aligned Core Strategies.

8.2 A draft timetable for further stages of preparation and publication has been prepared. It envisages the publication of the next draft of the ACS taking place in January 2012.

### Aligned Core Strategy – Draft Timetable

DATE	TASK
25 <sup>th</sup> July to 19 <sup>th</sup> September 2011	Publish Housing Position Paper, consult on draft Climate Change policy and on locally distinct issues
Autumn 2011	Consider and process comments on paper and responses to consultation. Prepare, 'Publication' Draft ACS
January 2012	Publish Draft ACS
Spring 2012	Submission of ACS to Planning Inspectorate
Summer 2012	Public Examination
Winter 2012	Adoption of ACS

## **APPENDIX**

### **ALIGNED CORE STRATEGIES POLICY 1: CLIMATE CHANGE**

In parallel with the publication of the Housing Provision Position Statement, the Councils are jointly consulting on a revised draft of Policy 1 of the Aligned Core strategies, on Climate Change. This policy attracted significant comment at the Option for Consultation stage, and has been redrafted to take account of some of those comments. Rushcliffe Borough Council will also be party to this consultation.

The consultation will run between 25<sup>th</sup> July and 19<sup>th</sup> September, and the policy is available on the councils' websites (see below), and also at [www.gngrowthpoint.com/housingandclimate](http://www.gngrowthpoint.com/housingandclimate).

### **LOCALLY DISTINCT MATTERS**

Broxtowe, Erewash, Gedling and Nottingham City Councils are also undertaking complementary consultation on a range of locally distinct issues within their own council areas.

#### **Broxtowe Borough Council**

In the 'Option for Consultation' Broxtowe Borough Council invited views on a range of sites which may be suitable for large scale housing development in the form of Sustainable Urban Extensions. They will shortly be deciding on which of these they consider is the most suitable to take forward into the next version of the Core Strategy.

The consultation will run between 25<sup>th</sup> July and 3<sup>rd</sup> October, and details can be found on their website at [www.broxtowe.gov.uk](http://www.broxtowe.gov.uk).

#### **Gedling Borough Council**

In the 'Option for Consultation' Gedling Borough Council were promoting Gedling Colliery/Chase Farm as a site for large scale housing growth. It has subsequently emerged that due to the high cost of providing the Gedling Access Road, on which development here relies, the viability of the site for the level of development envisaged is questionable. The borough council is therefore consulting on what alternative sites could be developed to make up the shortfall caused by a much reduced number of homes being developed at Gedling Colliery/Chase Farm.

The consultation will run between 25<sup>th</sup> July and 19<sup>th</sup> September, and details can be found on their website at <http://www.gedling.gov.uk/index/pe-home/pe-lp-home/pe-lp-localdevel/pe-lp-gnacs.htm>.

#### **Erewash Borough Council**

The Regional Strategy focuses growth on the main built up area of Nottingham (including Long Eaton) and the Sub-Regional Centre of Ilkeston. With the likely abolition of the Regional Strategy, Erewash Borough Council considers it prudent to demonstrate, in conjunction with neighbouring Derby

Housing Market Area (HMA) councils, that all possible options for development have been explored in their Borough. Derby HMA councils are currently consulting to consider an appropriate level of housing growth and also understand suitable locations for growth around the edge of the Derby main built up area. The city's long term expansion eastwards has seen it reach the Borough's boundary and if deemed suitable, any further housing development outwards in this direction would require the identification of green belt land within Erewash.

Derby HMA councils' consultation is due to commence in mid July with ongoing engagement into the autumn, and details can be found on their website at [www.derbyshire.gov.uk/derbyhma](http://www.derbyshire.gov.uk/derbyhma).

### **Nottingham City Council**

Nottingham City Council are preparing a 'Land and Planning Policies' Development Plan Document, building on the Aligned Core Strategies, which will show the sites to be developed in Nottingham and set out the more detailed policies it will use to manage development.

The consultation will follow that on the Housing Position Paper, and is likely to commence in September 2011. Details can be found on their website at [www.nottinghamcity.gov.uk/localplan](http://www.nottinghamcity.gov.uk/localplan).