

Summary and Comment on Issues Related to Northampton from the East Midlands Regional Plan Partial Review: Options Consultation and the Council's Suggested Response.

General response to provide broad context to more specific issues highlighted.

1. It is considered important that the East Midlands Regional Assembly in reviewing our critical responses to the partial review of the Regional Spatial Strategy (RSS) understands the broad context of Northampton's position. This is set out as follows:
2. Northampton retains its ambition to be a thriving "market city"; the economic and cultural heart of Northamptonshire; and a place of real choice for existing and new communities. It will continue to plan and manage its growth responsibilities in a pragmatic, practical manner to deliver quality, sustainable places, safe neighbourhoods and excellent facilities. The current RSS process and particularly the Regional Transport Strategy (RTS) and Regional Funding Allocation (RFA) have failed Northampton, and indeed the wider West Northamptonshire, leaving our town with a major responsibility for growth, but not the investment to resolve the infrastructure deficit, or deliver new infrastructure to accommodate regional plan levels of growth.

The RSS review provides an opportunity to address these failings and create a new platform for Northampton's future. One that secures a programme of investment proportionate to its growth and is clearly reflected in key regional strategies and documents. Growth must be related to the capacity to grow sustainably and be rigorously tested against deliverability before being enshrined in the RSS review. If investment/infrastructure fails to follow the spatial distribution of growth, then the plan fails. The RFA has isolated Northampton and West Northamptonshire and undermined, at least in part, at this early stage, the credibility/deliverability of the East Midlands Plan and MKSM SRS.

The content and scope of this RSS Review as proposed is limited, lacking basic information on key issues to enable options to be properly developed and judged, and naïve in its assumptions about funding being available for "major infrastructure". Increased housing need is inevitable in future years, but growth is not. Growth needs to be planned, managed and funded. Central Government's response to its own demands for growth through the RSS process has been inadequate. Growth is dependent upon investment interventions. The current recession, reduced land values, tighter lending criteria and growing unemployment requires a new approach to delivering growth and new homes. Investment and growth plans have to be planned and managed at the same time at the regional level. Approving spatial

distributions for growth at the regional level and imposing them on LDF's, in advance of investment decisions/funding allocations, poses a high risk of non-delivery. In the current fragile economic circumstances, with reducing central funds and reduced development values, the risk of non-delivery and mis-match would be simply irresponsible. This RSS review should adopt a new approach so as to manage growth aligned to necessary infrastructure, reduce the risks of non-delivery, and provide communities with greater confidence of quality places.

The Review, its timing and the issues that it covers

3. The Review seeks to address a number of issues in relation to commitments it made to the Secretary of State to allow the existing Plan to progress to adoption. Some of these issues are substantial in terms of spatial policy and how areas will develop in the future. In particular, the number of additional homes that areas should accommodate in the period 2021 to 2031 and a review of the transport strategy which could have significant impacts. Given that the Regional Transport Strategy (RTS) was seriously criticised by the Panel at the examination, this is an issue of substance. The material in the consultation documentation highlights a number of areas where additional research is being commissioned, or where information will be available at later stages in the review process.
4. Two elements of the Review at its current stage make for a very unsatisfactory scenario in trying to make informed decisions and responses, namely:
 - a lack of a full picture on which to make informed opinions for the purpose of responding at this stage to consultation questions, in particular the principle of where additional housing should go and the likely numbers, and
 - how the issues that are under review are sufficiently connected to other issues that are not under review, to ensure sustainable planning solutions are pursued, e.g. the relationship between housing numbers which is under review is not aligned to a change in number of jobs proposed for each area as this is not under review.
5. The Assembly has made a commitment to an early review of the Plan. However, it feels as if the Review is trying to keep to a timetable, rather than have its progress related to the pulling together of a fuller evidence base and a sound appreciation of the issues at the beginning of the process, which then lead on to the next stages of the Review. In particular, with the slow down in the housing market that has occurred, there is the potential to take stock of how the proposals set out in the Sustainable Communities Plan for Growth Areas and the RSS are

shaping up and whether it is appropriate to propose continued housing growth without a clear understanding and relationship to the matters of infrastructure delivery and employment provision. Within the Northampton area, the wider MKSM sub-region and the region as a whole, there is clear evidence of a deficit in infrastructure and there is an uncertainty over the capacity of existing infrastructure to cope with more growth; where additional funding will come from for new infrastructure and the timing of its provision. Until it is clear that there is a satisfactory solution to these issues being available, it is not sensible to consider commitments to additional development on top of that already proposed.

6. A clear area where this uncertainty exists which is affecting the timing and potential of housing delivery is in relation to the strategic road network, where, for example, the Highways Agency has a number of outstanding Article 14 holding directions on a number of housing site applications in Northampton. This is despite the area being identified as a growth area within the current Regional Plan, and the Sustainable Communities Plan, six years ago. Whilst some of the issues are site specific, overall it appears as if there is serious concern from this Agency to the principle of the required growth of the area and the trip generation that it will cause on the strategic highway network. It appears that whatever the direction of growth, there will be fundamental issues for this organisation responsible for the Strategic Road Network in supporting the growth agenda and the overall quantity of development currently proposed.

This type of issue should have been more robustly addressed at the regional level when considering the appropriateness of growth targets for individual areas, rather than it being left to the Local Development Framework development stage, or at application stage. A better understanding of infrastructure capacity across the region is needed to enable informed opinions to be taken as to extra growth.

7. Despite Government assurances of not wanting to do expansion 'on the cheap' when presenting the Sustainable Communities Plan, practical evidence and experience so far suggests otherwise. This in association with a lack of co-ordination, buy-in and financial planning of Central Government agencies, combined with an as yet undefined infrastructure requirement associated with the expansion plans within West Northamptonshire, creating substantial uncertainty about whether appropriate levels of infrastructure can be delivered to support growth.

As identified above, insufficient work has been done at the Regional and Sub-Regional Strategy Area level to adequately identify and plan for infrastructure requirements associated with the growth areas. In West Northamptonshire however, some of this is down to a lack of progress historically in seeking to positively plan for growth after the announcement of the Sustainable Communities Plan. This lack of a strong evidence base for infrastructure need in relation to growth plans,

combined with historic patterns of investment at the regional level means that in the short to medium term, a disproportionate amount of investment compared to housing and employment growth is committed to projects within the Three Cities Region (Derby, Leicester and Nottingham). This will have to change in the future if the growth agenda is to be delivered. This review should, at an early stage, assess the capacity of sub areas to take growth across the region.

8. These infrastructure issues also need to be fully considered in conjunction with the work that is being undertaken by the Regional Development Agency on the economic evidence base and by the Assembly.
9. For this round of the Review of the Plan, Northampton has to insist on a robust examination of infrastructure delivery at regional level to ensure that the current growth levels identified for specific locations can actually be sufficiently supported through associated infrastructure expenditure. The alternative is that housing numbers are given to areas without a clear understanding of whether the plans that should bring them to fruition are achievable or not. To not do so will perpetuate uncertainty about delivery of sustainable communities, create unease and heighten any existing hostility amongst existing communities about growth, slow delivery of Local Development Frameworks and consequently the delivery of homes and jobs set within the Regional Plan.
10. There has to be a reasonable certainty that the levels of development proposed are appropriate for an area in relation to existing and potential infrastructure provision and, if not, more appropriate areas within the Region identified. It is not acceptable to leave this type of testing to the examination of the Core Strategy and associated Local Development Framework documents.

Response to Consultation:

11. *The Council considers that at this time the progression of a Partial Review as set out to the current timetable is premature. The timing of the review should be delayed so that sufficient evidence is gathered and presented. This will allow an appropriate assessment of the capacity for areas to grow in line with the anticipated levels that are likely to be more guided by the 2006 Household Projections than previous anticipated levels of growth associated with the last round of Household Projections. There is clearly a deficit in the ability of existing infrastructure to cater for growth within the region and around Northampton in particular. This makes it difficult for existing commitments and plans for future commitments not already identified in the Local Development Frameworks to come forward and be planned for in a timely fashion.*

12. *Given the current situation in the housing market, now is the time to pause and take stock of the longer term position so that there is, in particular, a greater knowledge of infrastructure requirements and a thorough testing of how this is anticipated to be delivered in association with growth. Recent cuts in Government growth area funds is symptomatic of further funding problems. This work also needs to be tied in with an up date of the employment evidence base so that there is an integrated approach to both housing and employment when considering the anticipated growth of areas.*

Housing Provision - Numbers and Timing

13. The Partial Review focuses on housing provision post 2021; therefore the Assembly is not seeking comment on the current proposed numbers within the Regional Plan. The rationale behind this is that it does not want the Review to disrupt the process that many areas are going through of trying to adopt Core Strategies by changing their housing requirements over the short to medium term. The Council's last response to the consultation on the Regional Plan highlighted the inappropriateness of the targets particularly in the short term when considering the economic downturn. This response was approved by Cabinet on 23rd September 2008. It is considered that these concerns are still valid.

Response to Consultation:

14. *Whilst the Partial Review Consultation does not seek to re-open the debate on planning for housing provision prior to 2021, this Council considers that the annual targets set for delivery in the short to medium term within the current plan are now obviously inappropriate and unachievable. As part of the proper planning of the region, these targets need to be challenged, reassessed downwards, taking into account the real likelihood of delivery. This relates both to the market's appetite for development and also inadequate infrastructure that is now evident will restrict delivery compared to current targets. The annual targets should be reviewed downwards and numbers carried forward to later periods in the plan.*

2006 Based Household Projections

15. Nationally the number of households has been estimated to grow by 6.3 million to 27.8 million between 2001-2031. The current Regional Plan provides for some 21,500 new homes per annum for the period to 2021. The most recent Government household projections suggests the need for 28,000 dwellings per annum per year; a significant increase. The National Housing & Regional Planning Advice Unit, a Government Agency, indicate that between 23,400 and 24,600 new homes are needed per year to address supply and stabilise affordability at current levels over the longer term. Within West Northamptonshire the Government projections for the period 2001-

2026 show a figure of an additional 73,000 households, against a current Regional Plan additional homes target of 62,125. For the period 2026-2031 an additional 13,000 households will be generated. Within the current Regional Plan therefore there is an under provision of approximately 11,000 homes compared to the household need.

16. The Regional Assembly at this stage has made no commitment on what it considers to be an appropriate level of new housing over the period 2021-31. The Milton Keynes and South Midlands Sub-Regional Strategy (MKSM SRS) sets out a housing figure for the period up to 2026 for the Northampton Implementation Area and also wider West Northamptonshire. These figures have informed the housing numbers and locations proposed in the West Northamptonshire Emergent Joint Core Strategy for the period to 2026. The basic approach is for the Northampton Implementation Area to continue growing in a consistent manner. Clearly there is likely to be a desire from Government for the Region to boost its housing output above that already committed in the current Plan and into the future. As one of the Government's growth areas, Northamptonshire would at this stage appear likely to be a recipient of additional housing requirements.
17. The Emergent Joint Core Strategy proposals currently show additional capacity for housing in the period after 2026. These proposals are being tested through consultation to better understand the impacts on infrastructure delivery through enabling development, and the impacts on the environment and communities. The 13,500 new homes identified in the Emergent Strategy post 2026 would accommodate all development required in relation to Northampton (NIA) if current housing target levels were rolled forward until 2031. If the annual targets within the review are reduced as we recommend it would be over a longer period. However, the potential need to accommodate more homes within West Northamptonshire as part of this Review could lead to a rationale for more housing to be planned for in association with the future growth of Northampton.
18. The Review is seeking advice on whether there is any additional evidence around demographic and migration issues, which will have implications for the amount of additional housing required in the Region. Changes in household size, in particular more single person households will account for approximately 1/3rd of the need for homes, natural growth of the population will account for approximately another 1/3rd and in-migration about another 1/3rd. The Region will be commissioning additional research to test the assumptions behind the population projections, in particular international in-migration which is estimated that will generate up to a 1/6th of the new households.

Household growth: Implications for West Northamptonshire and Northampton.

19. West Northamptonshire and Northampton has in its recent history and will, up until 2021 at least, have been planning for household growth related to the existing population and a significant element of inward migration. Clearly in terms of making a commitment to future growth, it makes sense to plan for the housing requirements of the existing population from 2021. This in itself is likely to generate the need for a substantial number of new homes post 2021, simply as a result of the reduction in average size of households and from the off-spring of existing households.
20. With regards to planning for in-migration, after a period of likely considerable growth to 2021, it might be considered that further growth should be accommodated elsewhere in the region. However, given the relative strength of the economy and its proximity and ease of access to London and the South East, such an approach could cause problems for a substantial proportion of the population with regards to meeting their own housing needs after 2021. A significant number of in-migrants to the area from the UK have and will continue to come from London and the South East. These groups generally are in a better position to afford housing than existing residents due to larger salaries from either working in higher paid jobs in London and the South East, or through equity in the homes that they move from. Not planning to accommodate need from these groups will either mean that existing residents could live in unsuitable housing conditions within West Northamptonshire, or have to commute to and from cheaper areas elsewhere within the region to jobs within West Northamptonshire, or Northampton. It could also impact on the economy, as increased house prices will mean increased inflationary pressure on salaries, thus pushing up business costs.
21. There is unlikely to be a significant shift in national policy to direct substantial economic growth to regions currently in relative decline. This means that the dynamics of the relative attraction of the South East and London and the associated success of the West Northamptonshire economy is unlikely to diminish. Against this context, not planning for in-migration and only meeting growth could bring with it some potential problems for the existing population. Accommodating additional households will also assist in ensuring that the vision for Northampton's central area, as identified within the emerging Central Area Action Plan, will be more deliverable, particularly for retail planning purposes.
22. On this basis, in terms of principle, it is proposed that the Council should respond that the housing growth trend anticipated in the period to 2031, (and possibly beyond) should relate to the natural

requirements of the existing population with only a modest in-migration allowance sufficient to avoid impact on the economy, housing market and the town centre. However, this approach must come with caveats, in particular around the necessity for the availability of sufficient funds to provide the necessary infrastructure required within the area resultant from previous levels of expansion. There should also be sufficient funds to ensure that new development has the requisite associated social and physical infrastructure. In addition for Northampton, the change of status and role of the settlement as it emerges from an enlarged market town, to a city must be reflected in support for 'big ticket' items associated with this growth, e.g. support for increase in cultural and education provision, central area public realm improvements, transportation infrastructure, land assembly for regeneration areas, etc.

Response to consultation:

23. *Northampton Borough Council has previously cautiously welcomed provision of additional homes and jobs to assist in meeting predicted growth in households, sustaining economic growth and to support town centre regeneration. This however has been on the basis of there being sufficient support for associated infrastructure investment from Government. To date, since the announcement of the Sustainable Communities Plan and the associated increase housing targets set out in the MKSM SRS and the Regional Plan, the Council believes that there has not been sufficient funding and certainty of future funding to assist in delivering appropriate levels of social and physical infrastructure required for Northampton to accommodate growth and the change from a large town to a city. The Council needs to be convinced that this issue will be satisfactorily addressed in the future, with a firm commitment from Government and regional agencies to supporting an appropriate level of infrastructure within Northampton and to properly provide for the social and physical infrastructure required for the expansion.*
24. *If it can be suitably convinced, the Council, in principle, could support additional growth to meet the natural growth requirements of the existing population with only modest levels of in-migration as set out in Para. 22., with adjustment for earlier non-delivery of annual targets due to the recession. However, for this round of the Review of the Plan, the Council will insist on a robust examination of infrastructure delivery and investment planning at regional level to ensure that the growth levels identified for specific locations can actually be sufficiently supported through associated infrastructure expenditure. There has to be certainty that the levels of development proposed are appropriate for an area in relation to infrastructure capacity and potential infrastructure provision and if not, more appropriate areas within the Region identified. The Council believes that it is not acceptable to*

leave this type of testing to the examination of the Core Strategy and associated Local Development Framework documents.

Meeting Community Housing Needs

25. As part of the consultation process, the Regional Assembly are asking if there is any evidence on affordability or other housing issues that need to be considered as part of the Review. The West Northamptonshire Joint Planning Unit has recently commissioned a Strategic Housing Market Assessment for West Northamptonshire. It is working closely with the three District/Borough Council's Housing Strategy and Planning Divisions in its project management and the future housing and planning policy implications. The final version of the document will not be available until the formal consultation stage on this part of the Review closes, but it would be appropriate for this to be submitted when completed as part of the evidence to assist with the Region's policy development.
26. The Region will also be seeking to amend the Affordable Housing Policy for the period 2021-2031. Currently Policy 14 of the Plan sets a target for monitoring purposes, which is based on a number of dwellings, rather than a percentage of all new dwellings. Previously work at the Regional level has not gone into much detail into assessing specific housing needs for smaller geographical areas, but as would be expected has taken a broad brush approach to looking at a Regional need. Local authorities have commissioned the work that looks at more detailed local needs. With the Government's emphasis on a change away from Local Housing Needs Assessments to Strategic Housing Market Assessments, a more strategic view of areas will have to be undertaken and there is possibly a role for the Region in commissioning these assessments. However, there will still be the need for research to obtain more locally relevant information. On this basis it makes sense for Local Authorities to maintain responsibility for commissioning the research on their housing markets, and make it available to the Region. In terms of policy, whilst the affordable housing target set for monitoring purposes gives an indicative indication of the need for affordable housing, it is not translated into an affordable housing percentage to be required from new development. Percentages are set within LDF's. In terms of the potential for changes to the Affordable Housing Policy post 2021, it makes sense for the RSS to leave affordable housing percentage targets to be determined by local authorities on the basis of evidence that they collect. This is likely to be more up to date and flexible at any one time than any regional target, and in any case is the measure that nearly all local planning authorities use to determine affordable housing requirements from new developments.

27. With regards to other forms of housing, the Regional Assembly has identified in particular the fact that with an increasingly ageing population over the period to 2031, that there should perhaps be a regional policy on the provision of specialist housing for older people. Other than saying that Local Planning Authorities need to adequately plan for the housing needs of older people, something that is covered by national policy in Planning Policy Statement 3, it's difficult to know what a policy at the Regional level can add without potentially putting a straightjacket on locally appropriate solutions. The housing preferences and needs of older people are things that can change quite quickly and is one in which there has recently been innovation in providing new housing 'products'. Furthermore it is special housing needs in general that need to be considered, not just the needs of the elderly.

Response to consultation:

28. *The final version of a recently commissioned West Northamptonshire Strategic Housing Market Assessment and associated Viability Assessment will be available towards the middle of September. The Council and its partners will ensure that a copy is sent to the Assembly to assist with the evidence background to inform policy development for the Review.*
29. *With regards to affordable housing, the Council would prefer a policy that allows local planning authorities to continue to develop their own targets and tenure types based on the conclusions of the most up to date evidence of local needs and deliverability.*
30. *The Plan does not need to provide explicit guidance on the provision of specialist housing for older people. Its difficult to see what it could add to policy already set out at a national level and could, in any case, have the potential to stifle innovation and locally appropriate solutions.*

Milton Keynes and South Midlands Overview

31. The Review identifies that decisions about the future scale and distribution of growth in Northamptonshire have to be made within the context of wider MKSM policy. The Review sets out the approach to the MKSM SRS in which the three regional planning bodies have agreed to jointly review policies that apply to the whole of the MKSM area – the Part A Statement.
32. The amendments essentially will be based upon existing research that has been commissioned jointly between the 3 regional planning bodies, or joint working on MKSM groups and will be undertaken in a 'timely manner'.
33. With regards to the MKSM Sub-Regional Strategy part of the Plan, it's difficult to now understand its purpose, as there are differing levels of commitment to it from each of the Regional Assemblies. Despite its

existence, there is still a fragmented approach to this Sub-Region as it is addressed in three separate sets of regional plans that usually are reviewed at differing times. Even with the SRS policies, the settlements whose growth has to be accommodated in two or more regions, there have been problems in coming to a sensible co-ordinated solution. The Sub-Regional Strategy was put in place as a 'stop gap' measure to bring forward in advance of Regional Plan reviews the large scale expansion of areas as set out within the Sustainable Communities Plan 2003. There has to be a question as to what additional value it has now that revised household projections will be taken into account in updated Regional Plans.

Response to consultation:

34. *Without the provision of further clarity it's difficult to see what the policies within the MKSM SRS Part A will add to those that will already be accommodated within Regional Policy. This, together with the limited commitment of all the regions to see a need for such policies, and the differentiation in timing of regional plan reviews, perhaps calls for a fundamental assessment as to whether any such policies are required, and that the MKSM SRS has served its purpose.*

West Northamptonshire Options for Future Development

35. As well as reviewing policies across the whole of the region, the Review takes a look at the approach to the options for the location of development for each of the housing market areas. It offers four options:

Option 1: Continue with the current strategy of focussing development and regeneration at the Principal Urban Area of Northampton and the Sub-Regional Centre of Daventry

Option 2: Focus significant additional development at Northampton to create a much larger urban area

Option 3: Focus development at existing and improved public transport nodes.

Option 4: Focus growth more evenly across the area in a more dispersed pattern of development.

36. Numerous positives and negatives for each approach are set out in the Review document. For all of the options, apart from Option 4, it's clear that Northampton or the wider Northampton Implementation Area would be expected to accommodate additional housing. Option 4 in terms of sustainable planning principles is not really supportable in terms of current national and regional guidance, being inconsistent with sustainable development principles, particularly around transportation and infrastructure provision.
37. As identified above, the Northampton Implementation Area is more than likely to be required to accommodate further amounts of housing post 2026. It makes sense for some of the larger settlements currently identified for additional housing within the Regional Strategy to be planned to accommodate some housing for the natural growth of their existing populations. If there are technical impediments to these areas expanding, then, as an alternative, there may be sense in promoting other public transport nodes, although currently it's difficult to see which other settlements other than those identified now for additional housing would qualify. Long Buckby has a train station, however in reality unless it was planned to be a substantial settlement, it is likely to not be very self sufficient, and will end up with people commuting to Daventry, Rugby or Northampton, and more than likely by car.

Response to consultation:

38. *If there is an effective alignment between infrastructure, investment planning and levels of growth, then a continuation of the present strategic approach of 'concentration' on Principal Urban Areas remains sound. However, if as part of the review, the capacity of infrastructure to deliver growth is judged to be inadequate from technical evidence then the current strategic approach must be reviewed. Selecting a preferred option at this stage for the WNHMA would be premature and simply continue the previous unsatisfactory approach of identifying locations for growth and trusting that necessary infrastructure would be delivered. This current approach has been seriously discredited.*
39. *There will need to be an understanding of the implications of any strategy proposed within West Northamptonshire HMA on the strategy for North Northamptonshire HMA and vice versa, in particular the relationship between the roles of the settlements and their connections, primarily with regard to the central, strategic role of Northampton within the wider county area.*

Transport

40. The Review gives an indication of the Regional Outcome Priorities that will guide investment in transportation infrastructure and planning the location of development. These are based around:

Less Unsustainable Travel;
Effective and Efficient Travel;
and
Energy, Efficient Travel.

41. It identifies 11 Regional Challenges that will have to be met. The next steps will be to apply these outcomes and challenges to the particular circumstances of each HMA, and to set out the priorities for further research. The outcome priorities and the challenges appear to be a fair reflection of what can be considered to be consistent with the approach of needing to promote more sustainable travelling. The main issue will be the priority given to the objectives and their impact on funding levels, in this regard its noticeable that in terms of planning for additional demand for travel that regeneration is mentioned before growth.
42. For Northampton and West Northamptonshire as growth areas, the key issue will be the weight given to the need to fund the delivery of growth on the back of new infrastructure that, in the main, has not yet been provided for or planned. Transportation funding in particular is an area where there are very long lead in times and extensive competition. At regional and local levels priorities for investment have been set, which do not align closely to growth plans, which somewhat limits the ability to radically alter priorities in the short to medium term without significant additional resources being made available. As identified above, no matter where strategic development is proposed, the Highways Agency in particular has an issue with the quantum of development proposed for West Northamptonshire and its impact on the strategic highway network. These concerns combined with a current lack of suitable compensatory measures that can be provided on the back of new development, nationally or regionally committed funding streams to overcome infrastructure deficits, is likely to severely delay delivery of growth. The obstacles to growth have been well documented in the MKSM Transport Strategy and are to be further examined as part of the DaSTS programme.

Response to consultation:

43. *The Council believes that in the regional challenges set out in the review document that insufficient prominence is given to the issue of growth and the need to plan for and invest appropriately to accommodate the travel needed and generated from associated development. Whilst challenges such as 'overcoming existing and future traffic congestionin urban areas' are important, in most of*

these areas infrastructure already exists which allows people to have a range of choice about movement and to change their travel patterns. Within the areas planned for growth often no such infrastructure or level of choice exists. Recognition of this in terms of its prioritisation and the financial demands that it brings has to be factored into regional funding streams if growth is going to be delivered in a successful and timely manner. To simply allocate housing figures without rigorous assessment and identification of sufficient commitment to infrastructure projects to ensure delivery is an inappropriate response within the Review.

44. *The evidence to be gained from the completion of the regional DaSTS study of the A43/A45 corridor will be of fundamental importance to the review of the Regional Plan. Indeed it will be equally critical to both the potential scale and locations of growth around Northampton post 2021 to 2031. The review of RSS would be best placed to align new transportation interventions with enabling proposals for strategic areas of growth. Such well joined up strategic planning would be a solid platform for a fresh regional approach.*

Renewable and Low Carbon Energy Generation

45. The consultation has broad questions on appropriate mix of renewable and local carbon energy generation for the East Midlands, the strategy for carbon emissions reductions and the ability to best use the potential of production of energy to meet local heating requirements. It proposes identifying targets for each of the HMAs for percentage of CO2 savings to be made from heat networks, on site renewables and regional scale renewables.
46. The need to address climate change and meet the Government's commitments to reduce carbon emissions and provide more energy from renewable sources means that this is an issue that has to be addressed at regional level. Given where we are now, the national targets seem extremely ambitious. There is a need for regional policy to provide a robust planning framework to support appropriate provision of renewables. On this issue, on balance, it is probably useful, as long as it can be evidenced that they are appropriate against national policy criteria, for there to be targets within the regional plan for on site and regional scale renewables.

Response to consultation:

47. *The Council supports the identification of a HMA level of targets for renewable energy production. This is on the basis that these targets are appropriate in being based on firm evidence of what is technically achievable and appropriate within the environmental context/constraints of each HMA.*

Aggregates

48. The Review is waiting for additional information on the aggregates apportionments for the East Midlands. In the absence of these figures it poses questions about the methodology for future provision of aggregates and whether there should be a move away from provision in environmentally sensitive areas.
49. For Northampton, at this stage, there is little to comment on as due to geology the reduction in output in environmentally sensitive areas would not be off set by increased provision from sources within the Northampton area. Despite its designation as a growth area and associated need for aggregates, it appears based on trend data and the minerals industry's appetite for development, that Northampton is unlikely to come under significantly more pressure than currently exists for additional minerals facilities in or around the settlement.

Response to consultation:

50. *No comment*