



Briefing

Changing the climate in the East Midlands

East Midlands Regional Spatial Strategy

Over the course of the next few months the development plan for the East Midlands will be reviewed. The role of the Regional Plan is to provide a long term development strategy for the East Midlands over a 15 to 20 year period. This includes:

1. the scale and distribution of new housing;
2. priorities for the environment such as countryside and biodiversity protection, and;
3. transport, infrastructure, economic development, agriculture, minerals extraction, and waste treatment and disposal.

The [Regional Spatial Strategy](#) (RSS) has ambitions to encourage genuinely sustainable development in the region. This briefing outlines what is good about the Plan and what needs to change to keep to this ambition because the concern is that the Plan will also:

- Promote rapid growth in housing
- Tell every local council how much housing they have to provide up to 2026

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- Set out priorities for investment in roads and other forms of transport

And it could:

- Lead to the removal of green belt protection and the outward expansion of towns and cities in many areas
- Support the growth of regional airports

The RSS will be a statutory document, and local councils will have to conform to it when they draw up the plans for their own areas.

Whose RSS?

The main regional body responsible for writing the RSS is the [East Midlands Regional Assembly](#). This is an unelected body, but consists mostly of councillors chosen by each local authority in the region to represent them, together with Social, Economic and Environmental Partners.

Two other regional bodies, the [Regional Development Agency](#) (RDA) and [Government Office for the East Midlands](#) will also be very influential:

- The East Midlands Development Agency (EMDA) is the economic development body for the region, and the Regional Spatial Strategy will be expected to support the level of economic growth that EMDA plans for, by ensuring enough land is made available for new jobs and houses.
- The Government Office is made up of appointed civil servants from each government department, and their task is to ensure that national policies are applied in the region.

Democratic deficit

Our elected local councils do have a role in all of this, but it is very much diminished compared to the powers they used to have when they drew up the Structure Plans for each county. Structure Plans are already being phased out and the RSS takes their place.

The new legal status of Regional Spatial Strategy (RSS) and the abolition of democratically accountable Structure Plans create a strong imperative to place public participation at the heart of regional planning. Friends of the Earth East Midlands is concerned that there is lack of information about the regional planning process, with many communities in the region completely unaware of the review of RSS.

RSS and climate change

Climate change is now almost universally acknowledged as the most severe crisis facing human societies, and the natural environment, the world over. The UK Government recognises this and has set a target of 60% reduction in emissions of carbon dioxide (the main greenhouse gas responsible for climate change) by 2050.

Friends of the Earth East Midlands strongly supports this target (while recognising that as scientific understanding advances even greater cuts may be shown to be necessary). There is a risk however that action will be delayed and the political drive too weak because 2050 seems such a long way off. Increasingly scientists recognise that the emissions over the next one to two decades will be critical in determining our eventual fate and Friends of the

Earth and others are promoting a [Climate Bill](#) to make it a legal duty of government to reduce carbon emissions by 3% year on year.

Spatial planning has a major and positive contribution to make in meeting this challenge by promoting policies which reduce the threat of climate change through:

- promoting the highest standards of resource and energy efficiency in new development so as to reduce carbon dioxide (CO₂) emissions arising from construction and use
- requiring land-use patterns that reduce the need and the propensity to travel by car
- vigorously promoting small and large scale renewable energy projects
- restricting development which has a major negative impact on CO₂ emissions
- adapting to the harmful impacts of climate change.

RSS in particular has a key role, because it is the leading statutory plan for the whole region and, because it runs up to 2026, it can set an intermediate target to ensure that the East Midlands is contributing to the achievement of a 60% cut by 2050.

Planning for sustainable development

Government [planning policy](#) now recognises that “Sustainable development is the core principle underpinning planning.” The [Sustainable Development Strategy](#) gives the guiding principles for all policy as:

- Living within environmental limits
- Ensuring a strong, healthy and **just society**
- Achieving a sustainable economy
- Promoting good governance
- Using **sound science** responsibly.

It also makes clear that these goals should be pursued together, rather than traded off against each other.

The RSS for the East Midlands embraces these principles and has policies that set out to integrate the following ambitions:

Policy 1

Regional Core Objectives

To secure the delivery of sustainable development within the East Midlands, the following Core Objectives should be met:

a) To reduce social exclusion through: the regeneration of disadvantaged areas, the reduction of inequalities in the location and distribution of employment, housing, health and other community facilities and services, and by; responding positively to the diverse needs of

different communities.

b) To protect and enhance the environmental quality of urban and rural settlements to make them safe and attractive places to live, work and invest in, through the: promotion of 'green infrastructure'; enhancement of the 'urban fringe'; and promotion of high quality design which reflects local distinctiveness.

c) To improve the health of the region's residents through improvements in: air quality; 'affordable warmth'; the availability of good quality housing; and access to health, leisure and recreation facilities & services.

d) To improve economic prosperity, employment opportunities and regional competitiveness through: the improvement of access to labour and markets;

and ensuring that sufficient good quality land and premises are available to support economic activity in sectors targeted for growth by the Regional Economic Strategy.

e) To improve accessibility to jobs, homes and services through the: promotion and integration of opportunities for walking and cycling; promotion of the use of high quality public transport; and encouragement of patterns of new development that reduce the need to travel.

f) To protect and enhance the environment through the: protection, enhancement, sensitive use and management of the region's natural and historic assets; avoidance of significant harm and securing adequate mitigation or compensation for any unavoidable damage; and recognition of the limits to the capacity of the environment to accept further development without irreversible damage.

g) To achieve a 'step change' increase in the level of the region's biodiversity through: the management and extension of habitats to secure net gains in biodiversity; and ensuring that no net loss of priority habitats or species is allowed to occur.

h) To reduce the causes of climate change by minimising emissions of CO₂ through: maximising 'resource efficiency' and the level of renewable energy generation; making best use of existing infrastructure; promoting sustainable design and construction; and encouraging patterns of new development that reduce the need to travel.

i) To reduce the impacts of climate change, in particular the risk of damage to life and property from flooding and sea level change and the decline in water quality and resources, through the location, design and construction of new development.

j) To minimise adverse environmental impacts of new development and promote optimum social and economic benefits through the promotion of sustainable design and construction techniques.

Despite these strong statements of principle, there is much in the draft RSS that gives cause for concern, and suggests that growth will lead to degradation of the environment, growing emissions (from transport in particular) and a reduced quality of life for many people across the region.

The draft RSS has been subject to a [Sustainability Appraisal](#) and the independent consultants who carried this out raise similar concerns. An analysis of some of the key

findings raised in the Sustainability Appraisal appears below and will help inform Friends of the Earth's response to the consultation.

East Midlands Regional Plan: possible campaign issues for Friends of the Earth

The following potential campaign issues are raised in the Sustainability Appraisal:

The Plan does not have a specific climate change policy and does not consistently support the climate change objectives in Policy 1. [The SA does not consider a carbon reduction target.]

The Government should carry out a further review of aviation related to climate change impacts.

The road schemes should be limited to those already committed in the next three years, so that the programme can be reviewed to bring the programme into line with the objective of reducing car use – i.e. less roads more public transport, cycling and walking.

There should be a more ambitious target for progressively reducing traffic growth.

Road user charging should be investigated with urgency.

Policy proposals are needed to achieve the renewable energy targets. [Note: the renewable target for 2010, not including offshore, is only 6.4%.]

The scale of development could be a threat to the environment – particularly Lincoln and the Nene Valley.

Housing growth is not linked to employment trends.

Water resources and sewage treatment capacity could restrict development.

A delivery mechanism is needed for rural affordable homes.

What is good about the draft Plan:

Sustainable Construction & Design Guide & Policy 3 (could be better e.g. EcoHomes Excellent instead of Very Good).

Traffic reduction target – should be more ambitious.

Renewables target, especially target for micro-generation.

Zero growth in waste and 50% recycling/composting MSW by 2016 [but 50% is a reduction from the figure behind current RSS which is 60%, and there is no improvement in the target for 2021 – so requiring higher incineration/MBT.]

Affordable housing targets [but questions whether they would be achieved particularly where they are most needed – in rural areas and regeneration areas].

The main recommendations from the Sustainability Appraisal are summarised below.

Abbreviations

AQMA	Air Quality Management Area
CHP	Combined Heat and Power
LDF, LDD	Local Development Framework, Local Development Document
LTP	Local Transport Plan
MSW	Municipal Solid Waste
NEMA	Nottingham East Midlands Airport
SAC	Special Area of Conservation
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest

East Midlands Regional Plan - summary of recommendations from Sustainability Appraisals

The main Sustainability Appraisal has considered Part 1 of the Draft Regional Plan.

Key recommendations on Part 1 of the Draft Regional Plan

A summary of the key recommendations in the Sustainability Appraisal for Part 1 of the Draft Regional Plan is given in Table 22.2 (section 22.6) in the Final Report of the Sustainability Appraisal (September 2006). The main points are:

Implementation

- The implementation framework (policy 55) should give further consideration to capacity constraints with respect to water resources and sewage treatment works.
- Careful appraisal will be needed of potential conflicts between development and environmental sensitivities at the local level (in preparing LDFs).
- Depending on the outcome of these two points, the scale and distribution of housing at a regional level may need to be reviewed.
- Also, a clearer statement is needed on the policy response where housing is not broadly consistent with employment trends.

Climate change

Both mitigation of and adaptation to climate change are included in the Core Objectives (policy 1 h & i). But these are not well addressed in strategy. Separate policy(ies) on climate change or 'climate proofing' of the Plan may be needed. The Sustainability Appraisal does not spell out what such policy might say, but the following key recommendations are relevant to climate change:

- a more ambitious target for reducing car use, and stronger support for walking, cycling and public transport;
- ensure employment allocations are accessible by walking, cycling or public transport;
- ensure housing development is consistent with local employment to prevent commuting new growth should be supported by local jobs rather than wider transport links;

- limit road schemes to those already committed, and increase investment in public transport;
- investigate road user charging with urgency;
- investigate the potential for local sourcing of goods – to develop sustainable patterns of production and consumption;
- consider how to reduce the isolation of people in peripheral areas by developing local opportunities rather than access to opportunities elsewhere;
- adopt a clearer approach to out-of-centre office development;
- review airport expansion;
- include the domestic energy reduction target of 30% over 10-15 years in policy;
- require BREEAM EcoHomes Excellent standard for all new homes (not just Very Good);
- to meet the demand for water will require a combination of greater efficiency, more resources and possibly less development;
- investment in sewage treatment works will be necessary in some areas, and in some areas it may not be possible to accommodate the increased sewage effluent;
- development should be directed outside flood plains, and ‘soft engineering’ processes should be required;
- enable biodiversity to adapt to changing climate;
- review advice in Sustainable Construction and Design Guide.

Other key recommendations

- a mechanism is required to deliver rural affordable homes;
- conflicts due to recreational pressure on the environment will need to be managed, but also developing opportunities for eco-tourism;
- conflicts between development and environment will need to be resolved – using Appropriate Assessment for Natura 2000 sites;
- Historic Landscape Assessments should be encouraged through LDFs;
- poor brownfield land should be developed before brownfield land with biodiversity;
- Minerals LDDs should be encouraged to establish minerals consultation areas;
- waste policy should be coordinated with the Regional Waste Strategy.

Sustainability Appraisal Framework objectives

The Sustainability Appraisal considers the policies of the Draft Regional Plan against the following objectives. The main recommendations for policy change are shown in the table on the next page.

1. To ensure that the housing stock meets the housing needs of the region
2. To improve health and reduce health inequalities
3. To provide better opportunities for people to value and enjoy the region’s heritage and participate in cultural and recreational activities

4. To improve community safety, reduce crime and the fear of crime
5. To promote and support the development and growth of social capital across the region
6. To increase biodiversity levels across the region
7. To protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological assets of the region
8. To manage prudently the natural resources of the region including water, air quality, soil and minerals [In list below, 8w = water, 8a = air quality, 8f = flood risk]
9. To minimise waste and increase the re-use and recycling of waste materials
10. To minimise energy usage and to develop the region's renewable energy resource, reducing dependency on non-renewable resources
11. To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to ensure that all journeys are undertaken by the most sustainable mode available
12. To create high quality employment opportunities
13. To develop a strong culture of enterprise and innovation
14. To provide the physical conditions for a modern economic structure, including infrastructure to support the use of new technologies

EM Regional Plan: Policy recommendations in Sustainability Appraisal (Appendix B)

P = Policy number in Draft Plan

O = Objective number in Sustainability Appraisal (see above)

P	O	Recommendations for changes in policy wording
3	6 8f 8a 10	Guidance needed to enhance biodiversity in planning and design (add ref in text to 'Biodiversity by Design') Ensure no detrimental effect on flooding or subsidence Encourage local sourcing of materials and reuse of construction and demolition materials Encourage locally sourced materials; EcoHomes Excellent standard should be required
5	2 6 10	Encourage walking and cycling before public transport (to promote health) bp5: add reference to protection and enhancement of biodiversity Encourage walking and cycling in preference to public transport; Specify sustainable transport
6	5 6	Enhance community facilities, as well as protecting them LDFs, LTPs & economic strategies should ensure biodiversity and tourism do not conflict
7	2 10	Encourage walking & cycling in E sub area, along with public transport accessibility Improve non-car modes of transport as opposed to 'multi-modal accessibility'
11	6	Encourage tourists to visit outside of the Peak Park – to reduce pressures on the Park
13	1 8a	Recognise the need to reduce outmigration from Nottingham & Leicester in particular

	11	Promote only public transport accessibility (not all transport links) Require balance between jobs and homes in urban areas to reduce the need to travel and car use within and between the 3 cities, and help decouple housing growth from demand for car travel.
14	3 12	Consider distribution of development to reduce pressure on Lincoln There should be a clear policy response if housing is not consistent with employment trends
15A	1	New policy required to facilitate delivery of rural affordable homes
21	3	Stronger reference to protect the historic environment and make the most of cultural assets in town centres
24	6 8w 10	Ensure environmental capacities are not reached or exceeded Outline what is meant by environmental capacity, including water resources Promote tourism facilities within walking and cycling distance of services and facilities
28	6	Add explicit reference to the need to enable biodiversity to adapt to climate change
29	6 8w 8f	Encourage planting of trees resistant to impacts of climate change (also ensure native species are not lost) Additional woodland to protect water resources Require planting of appropriate species in appropriate places
31	3 6	Encourage use of SPDs in sensitive locations (e.g. Lincoln) to protect historic environment Promote access to historic environment without negative impact on biodiversity; Guidance to prevent use of disused buildings destroying habitats
32	1 6 8w	Consider the need for Increasing water efficiency target in Lincolnshire Fens Add bullet point to adapt to effects of climate change Ensure water resources are sufficient to adapt to climate change; Water resource and sewage treatment capacity may limit housing growth
34	8f	Add more information in text on coastal zone management
35	8f	Take climate change impact on flooding into account – ensure LDFs include provision
36	6	Protect habitats from mineral extraction – or require habitats elsewhere to mitigate
38	10	Include the 30% target for domestic energy reduction in policy
39	7 10	Add criteria for CHP and district heating to avoid negative impacts on landscape Include a policy objective to develop policies and proposals to achieve the renewable energy targets
40	3	Strengthen objectives to show a clear priority for reducing transport
41	5 7 8a	Add reference to modal shift towards walking & cycling Consider a strategy for regenerating peripheral areas which does not rely on increased accessibility

	11	Encourage walking, cycling and public transport Consider conflicts between increased accessibility and reduced traffic growth; Include an ambitious target for reducing traffic growth
42	2 5 5 7 8a 10 11	v – encourage sustainable transport infrastructure i,iv,v – promote walking & cycling to promote better social cohesion ii – overcoming rural isolation may reduce social cohesion v – include sustainable access from deprived areas and to regeneration zones ii,v – encourage walking, cycling & public transport v – promote sustainable transport infrastructure i - improve local opportunities rather than access to opportunities elsewhere
43	10	Require progressive reduction in rate of traffic growth to reduce energy use
45	2 7 8a 10	Stronger wording to require traffic reduction measures are actually taken up Encourage uptake of traffic reduction measures Encourage uptake of traffic reduction measures Require transport authorities to examine feasibility of fiscal measures – and implement them to ensure care use is reduced
49	2 8a	Encourage bus fleet upgrades to reduce air pollution
51 52	1 3 7 11	Limit road schemes to those committed in the next 3 years – with a view to reducing car use in future Investigate public transport schemes as a matter of urgency to increase certainty of delivery – future programme should be weighted more to committed public transport schemes, walking & cycling
53	10	NEMA – implications of energy use and greenhouse gases need to be looked into further
54	1 7	NEMA – government should review expansion Aim to reduce growth of air travel; Study viability of more localised patterns of supply and demand
55	3	Develop indicators for accessibility to and quality of green infrastructure

What Happens Next?

The draft RSS is open for consultation until 20 December 2006. Anyone can make their views known, comments should be sent to the [Regional Assembly](#).

Friends of the Earth East Midlands will be making a full and detailed submission. In this briefing we have been able only to scratch the surface of the issues and highlight some key concerns, particularly in relation to the potential climate change impacts of the plan. The full draft of the RSS is over 100 pages long and contains much more that we have not commented on here.

If you share some of our concerns, we encourage you to respond to the consultation. You can use this briefing and our website to do this - check the [East Midlands homepage](#) for updates, press releases and easy email actions.

Please contact calliel@foe.co.uk or Telephone 0115 9506 926 if you would like copies of these guidelines or to discuss any queries you have about the RSS.

You can also air your views on the draft RSS in local papers and on radio, and contact your local councillors to ask them where they stand. Although local councils had some involvement in writing the draft, they do not necessarily support all it says.