

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE SOUTH EAST: PARTICIPANT 7124

MATTER 10B- MONITORING, REVIEW AND FORMAT OF THE RSS

10B.1 Are the proposed means of measuring progress towards achieving the RSS objectives appropriate, including the proposed monitoring indicators. (Section F)?

1.1. The proposed monitoring framework is that set out in the Draft Plan documents of March 2006. The Implementation Plan had a significant update in October 2006, and the Monitoring Plan therefore needs further update to monitor the actions identified in the Implementation Plan.

1.2. In line with PPS11, the Monitoring Framework covers both specific monitoring against targets to monitor the performance of the Plan itself, and contextual indicators that monitor the factors the Plan is intended to influence. There are outputs, contextual and also process indicators. Process indicators are helpful because they indicate an issue is being studied, but this may not necessarily indicate any action is being taken. This is particularly important in key sustainability areas, such as affordable housing.

1.3. As the Monitoring Plan is written, on Housing (H1-H4) the monitoring will show the level of housing against targets, but there needs to be parallel monitoring of local needs to know whether the housing is at the right level and in the right place to meet affordable housing needs in a local area.

1.4. Housing completions and affordable housing completions on a district level as currently reported may not show whether progress towards meeting the backlog of affordable housing is being met or becoming worse vis a vis evolving need, and how, at regional level, the scale and dimensions of the challenge is changing. Not only the local housing needs survey process needs monitoring (number of LAs with housing and market needs assessments), but also its outputs: evolution of housing needs: market and affordable.

1.5. On water, the monitoring indicators proposed only give the top line performance measures of per capita consumption and 'no restrictions at peak demand'. While these are both significant they are inadequately diagnostic for a natural resource as critical as water. Also as set out the proposed indicators do not include any measures of sewage treatment constraints: either capacity or discharge constraints: two factors which current constraints on location and scale of development.

1.6 The reason for making these points is that monitoring should include intelligence to help those deciding whether the plan is on or off-track, and how best to manage interruptions and external changes as they occur. On climate change effects, as well as on the affordability of housing this Plan's Implementation is likely to be something of a 'high wire act'. 'Intelligent' monitoring closely linked to the Implementation Plan will be essential. Indicators that are simple to administer but give useful diagnostic guidance to the local authorities, regional bodies and delivery

partnerships working in each policy area. It is these groups that can best identify what measures are practical, useful and should be the basis of the monitoring. This should help the Plan's achievement, and avoid unnecessary monitoring.

1.7. In a region as complex, and dynamic as the South East, process gaps need to be identified, addressed and monitored as much as the activity level of the processes that are in place. Such areas are:

1. the indicators on noise (NRM8) to be developed should include a measure of tranquillity so that this can become a quality of life indicator, not just a technical measure of ambient and peak range noise.
2. the indicators on countryside and landscape management (C3) should include economic indicators for vibrant farming in a basket of indicators for countryside quality. These measures should be recommended by the SE Rural Affairs Forum and the Rural Delivery Partnership, and include for example access, land management and soil quality dimensions.
3. the historic environment BE7, should be monitored not just by the physical dilapidation of the very large number of historic buildings in the region, but by a more positive measure reflecting the value and priority attention paid to historic context in the refurbishment and regeneration of town centres and in the management of historic landscapes in the SE. The SE Historic Environment Forum should be asked to recommend practical and useful indicators for the historic environment.

1.8 As the Monitoring Framework is due to be updated probably before the Plan is adopted (at minimum to be better aligned with the Implementation Plan), the Integrated Regional Framework (IRF) review group expected for 2007, should be asked to advise on indicator updating against the current set of IRF objectives.

10B.2 Is the draft RSS sufficiently explicit about how the plan monitor manage approach is intended to work (Policy H1 & H2)?

2.1 The practical application of the plan, monitor & manage elements in terms of the mechanisms for readjustment of the plan is off-track, as set out in 6.1 i)-vii) of the Monitoring Framework, and referred to in section 7 of the draft Implementation Plan (October 2006).

2.2. With reference to H1 and H2, the indicators defined provide for local authorities to report on their ongoing plan adjustments to deliver the plan in a dynamic situation in which some sites will come on stream when anticipated and others will be reassigned to another land use or rescheduled, or replaced. The important thing is that under normal circumstances for an LA, the target, which is now statutory, will be maintained and either achieved, not achieved or exceeded over the life of the plan.

2.3. LAs are already very familiar with the plan monitor manage process, and will adapt existing processes to respond to the statutory nature of the Housing targets.

10B.3 Is the draft RSS clear enough about the other circumstances that would trigger its review?

3.1. The purpose of the Plan is to be an important part of delivering sustainable development. Therefore if the contextual indicators show trends that are consistently in the direction of unsustainable development that should trigger a review of the plan to determine how the plan could be changed to deliver more sustainable development, or at a least should moderate the pace of unsustainable development while other factors outside the control of the region are addressed for example through national policy.

3.2. The Plan has been prepared at a time of high economic activity; and unsustainably high levels of environmental impact and backlogs of underinvestment in infrastructure and affordable housing. These conditions increase the risk of further unsustainable development. However, the challenge has not been ignored and the Plan has set out clearly the challenges and the imperatives that these circumstances require and acknowledges that flexibility will be very important. The process mechanisms that now exist at regional level and the new structures in and between county councils to deliver sub regional mechanisms will enable the plan, monitor manage approach to cope will a wide range of circumstances arising.

3.3. However, the Plan does impose huge further environmental stress on the region unless the behaviour change required begins to kick in. That requires action outside the control of the region. Also the effects of climate change are being felt now in severe weather disruption and untypical seasonality, but there is yet to come severe flooding situations, including increasing effects of sea level rise: all anticipated during the Plan period. One of the most challenging aspects of the plan is the impact of shoreline management plans, which although 100year + plans will need to be discussed with those impacted and with house insurers during the plan period, and could have a very significant impact on housing plans in coastal areas. A partial review based on an impact assessment of climate change combined with shoreline management plans is likely to be necessary within 10 or even 5 years of the adoption of the Plan.

3.4 Non delivery of infrastructure is a widespread and serious concern now: there is scepticism based in current experience about whether the infrastructure being written into regional and sub-regional investment frameworks will be delivered in a timely manner, or at all. Great effort and innovation is underway to develop funding mechanisms to address timeliness, but developer contributions are heavily dependent on viability factors such as land values and house and building prices, and government commitment has been less and later than planned. These circumstances also apply to affordable housing.

3.5 The unresolved issue is at what point under-delivery of infrastructure and affordable housing trigger a partial or full review of the plan or whether the mechanisms in place for plan monitor manage are sufficient to 2016, at which point issues become the context and challenges for the next Plan. The Plan should include a section or some assumptions on how these processes will apply, because national guidance seems insufficient in these areas.

10B.4 In the interests of producing a succinct document:

- **Is the balance between regional and sub-regional policy components appropriate?**
- **Are there instances (not already covered in earlier matters) where regional policy fails to add value to national policy and to the specific circumstances of the region (taking account of PPS11, paras1.1 and 1.7)**

4.1 Regional policy is in most cases, with the notable exception of housing, broad guidance for action, setting a framework to steer the region in the direction of sustainable development, reinforcing in a regional context national guidance on topics such as green belts, strategic gaps and natural resource management. Sub-regional policy focuses only on the additional policies and specificity needed to set a sub-regional framework for an area, which is either a part of a county or part of more than one county.

4.2 One of the key issues being examined through the sub-regional sessions is whether local authorities are getting sufficient guidance to enable them to produce local development documents applying together national, regional and sub-regional policy. The principle of non-duplication and non-repetition means all three are relevant.

4.3 The advantage of greater specificity of at sub regional level is that this may lead to better delivery where there are important issues of resources or priority that need technical and political support. However if the direction is not yet resolved at local level, specificity at sub regional level may just harden resistance. The partnerships at sub regional level to assess appropriateness of more specific policies are therefore very important. Each sub region will have its own contrasting circumstances.

4.4 Concerning the need for an end point vision and a strategic diagram of the region as set out in PPS11 para 1.7, we drew attention to the shortcomings of the key diagram in our submission of June 2006; in particular:

- Environmental assets might be indicated with AONB overlays.
- Hubs are important, but at the end of the sub regional examination it would be helpful to reflect which can reasonably be development hubs, and those that are more properly only transport hubs due to environmental and other constraints on development. The issue of whether the transport infrastructure investment is likely to be forthcoming to establish the transport hub is also relevant.
- We have questioned the consistency of the connectivity shown in the diagram. There needs to be greater clarity about the reality of the radial communication links towards London vs the East – West communications across the regions. A Diagram that assumes these are equal will lead to incorrect assumptions about where development should realistically take place in relation to employment. Also, some key links are missing – notably the A34/Rail link between Southampton and Oxford (and through to the Midlands) is not included.
- There are significant differences between the Regional Economic Strategy Key Diagram and that of the RSS. The role of each needs to be clarified when the implementation plans are linked and unnecessary differences ironed out.

January 2007