

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE SOUTH EAST: PARTICIPANT 7124

MATTER 1 APPROACH AND LEVELS OF GROWTH

Sub-matter 1A STRATEGIC ISSUES, VISION AND OBJECTIVES

1A.1 What are the key spatial strategy challenges facing the South East and is the response of the draft RSS adequate? (To include reference to the results of monitoring performance against RPG9, and recent, post-RPG9, developments in national policy e.g. the Sustainable Communities Plan and emerging planning policy statements).

1.1 The issues and challenges set out in the South East Plan are pervasive and all-encompassing. There are many challenges and dilemmas facing the region that need a robust response. These issues are not of the Plan's making; they exist in full measure regardless. Economic and social changes have had an impact across southern England, and these will continue and accelerate. Urban life has become more diverse, while the rural communities have changed from a majority working on the land to commuters and small business people.

1.2 All this is accompanied by changes in lifestyle and outlook. Greater mobility and better communications have changed the nature of community. They have also eroded many traditional values of home and family. There is more interest in the here-and-now than in the hereafter. The environment of the region has also undergone many changes and climate change threatens to accelerate this process. Despite this, a high quality environment and countryside remains one of our priceless assets to be nurtured for the future.

1.3 The Sustainable Communities Plan calls for a step change in housing supply around the South East by 2016, and suggests that the greater South East has the potential to provide an additional 200,000 homes over and above that planned for in regional guidance. The SCP has housing at its heart, and the Government's thinking has moved towards affordable housing for key workers. There is merit in seeking to balance jobs and homes within the wider region as a whole. In this sense, the SCP should match existing regional guidance and principles of sustainable development. It should also allow growth areas to make a contribution to sustainable development in the region, but this may be offset by the negative impact of this growth. The SCP has also given a commitment in principle to the provision of essential infrastructure, but this should not cloud the question of desirability. The RSS must be essentially derived from its own assessment of needs and opportunities.

1.4 A number of the emerging and recent PPS reviews will be relevant to the examination of the RSS. These will include PPS3 on housing and PPS7 on sustainable development in rural areas. It does not help when reviews are over extended and any sense of direction is lost. This results in a watered-down policy

which tries to please everyone. Again, it is important for the region to be clear about the direction of travel, and for its policies to reflect its values and priorities.

1A.2 Are the draft RSS's vision and objectives clear and appropriate? How will this vision of a healthier region be achieved (section C, para 2.2.1)?

2.1 The vision of a healthy region is good in itself but, the Plan is more to do with the quality of life. Health and well-being are part of a greater equation; there is a risk of the vision being seen in some narrow medical sense. There is a clearer vision in the Core Strategy. We look to a vision that is more integrated and comprehensive. Simply setting out a shopping list of items is not enough; it is the integration and consolidation that matters. Land use visions must go beyond attempts at environmental enhancement and natural resource management. They must naturally encourage economic success as well as opportunity and equity. For the region they must consider regeneration and renewal, and concentrate on urban development combined with more sustainable transport systems. But this is insufficient if it does not add value and contribute to an integrated vision and concept for the future.

2.2 Other elements of the vision for the South East should include celebrating cultural diversity. This should facilitate cultural expression, while accessing and preserving heritage icons and local history. Accessible services and transport sustainability are essential, as is making transport work better while managing travel demand. The prudent use of resources should involve the wise use of natural resources avoiding abuse of energy and water supplies, while enhancing landscape quality and biodiversity. Housing policy should be capable of allowing market activity, combined with social provision to match needs. A basic respect for rural life is important, with better recognition of rural values and a wider role for the countryside. This might well focus on rural economies and lifestyles, as well as considering landscapes and tranquillity; but working in parallel.

2.3 The vision should aim for physical and social regeneration that delivers urban renaissance and makes towns and cities liveable. It should bring communities to life by engaging the spirit and diversity of local communities. It must also hatch the golden egg and ensure the region's economy is sustainable and allows for a greater spread of opportunity across all regions. It also needs to realise sub regional needs and aspirations, as well as planning for lifestyle change and be flexible in predicting life patterns to 2026.

2.4 The underlying objective and theme should be sustainable development for the whole region. With the pressure for increased growth this will be the key challenge for sustainability. CPRE priorities relate to the future of the countryside in the South East, and to its beauty, tranquillity and diversity. Regional policy is one of the best strategic tools for ensuring the countryside is fully recognized and protected from destructive influences. Regional policies have given us the Green Belt, and have identified areas of planning restraint as well as those in need of regeneration. However, the use of land has often been wasteful, and the challenge now is to utilize land well, to husband its resources and to plan the future with sensitivity.

2.5 We see the importance of the countryside as fundamental to the region and its setting. It should not be seen merely as a rural backcloth, but as a core element in the

life of the region and its future. Concern for its survival and protection is not therefore a specialist interest, but one that affects everyone and all generations. Concepts such as smart growth and urban regeneration all combine to complement a regional framework that should have the environment at its heart and sustainable development as its main driver. We are also aware of the very many influences on the region, and not all benign. Global competitiveness is a key driver now, as are European spatial perspectives. However, global influences can also bring social and cultural benefits, as with the identification of special habitats and world heritage sites

1A.3 Is the draft RSS right to adopt "a cautionary approach" to growth over the long-term (section B, para 7.4.1), and to plan to meet the "reasonable needs" of the region (Statement of Policy, section C, para 2.2.1)? What is meant by the concept of reasonableness?

3.1 There are no special reasons for spatial planning in the South East to adopt a cautionary approach to the level of growth. A similar approach was adopted to RPG 9 by SERPLAN. This led to a 'temporary' Policy H1 up to 2006, which called for an early review with a likely increased level of provision. In 2001 it was regarded as premature to specify the level of provision because of knowledge gaps about urban capacity and the scope of possible growth areas. This is no longer the case, and the amount of data assembled during the Plan process has had no previous parallel. Moreover, the determination of sub regional reviews at Milton Keynes and Ashford has closed some gaps in provision. The results of monitoring have also informed the process, and will be a key element in the future.

3.2 No one in the Plan-making process will be thanked for taking a so-called cautionary approach to the level of growth. Growth pressures undoubtedly exist, and a more robust and confident approach is essential in addressing these, challenging them and setting a clear future course. It is important not to duck the challenge, but to assess and respond. This does not mean all growth should be accommodated, but that its future significance must be matched by considerations of sustainable development in all its forms. The role of London is a major component, as is the conversion of projections into requirements, and the better use of land and vacant buildings.

1A.4 Has the draft RSS been properly informed by Sustainability Appraisal? How can the recently completed Appropriate Assessment best inform the testing and finalising of the draft RSS?

4.1 The Sustainability Appraisal is a statutory process, but it is not certain what difference it will make to the Plan. The broad brush nature of policy at a regional spatial strategy level meant that the work was not able to draw conclusions about whether the policy impacts would be negative or positive on many of the parameters of the Integrated Regional Framework. While this must cast doubt on the usefulness of some of the work, the assessment process was nevertheless quite robust and some assessments could be made with substantial confidence. It is these that lead to the conclusions that the impacts of the Plan will be to further damage the environment and degrade and deplete natural resources in the region without meeting the social objectives on provision of affordable housing and reduction of homelessness.

4.2 The Sustainability Appraisal (SA) might have been more robust if work on cumulative assessments had been extended as this would have illustrated the conclusions with greater clarity. It is also possible that the SA should have pressed for more alternatives to be examined to address the sustainability issues raised. The findings emerging from the appraisal have been used to modify the Plan before it was submitted, and an audit was done of this influencing process. However, this is somewhat buried as one of the many annexes to the Appraisal.

4.3 It was also agreed that the Implementation Plan should be the mechanism to address the key sustainability concerns identified in the Sustainability Appraisal of the Plan. Looking at the detail of the latest version of the Implementation Plan there has been a bold attempt to confront the sustainability issues raised. These include the necessity of behaviour change to reduce resource consumption and to stabilise the eco footprint of the region without undermining economic and quality of life parameters. As the Implementation Plan (IP) is an integral part of the South East Plan the Sustainability Appraisal will have certainly informed the Plan if these actions are carried forward as set out in the Implementation Plan.

4.4 Experience of Appropriate Assessments (AA) is limited at present. The most important aspect of the assessment process should be to set out all the relevant data and provide a helpful analysis of the main issues. The assessment process should aim to contribute to the 'planning balance' needed in making judgements and land use decisions. It is not helpful for the assessment to indicate that damage is likely to occur without this being followed up with a plan for avoidance and mitigation. By identifying those *Natura 2000* sites where impacts will arise from projects *in combination with* the policies and plans of the South East Plan, the AA will inform the Plan. But its effect will also depend on the practicality and acceptability of the mitigation measures. It remains to be seen if some difficult strategic conflicts arise between habitats and land use strategies.

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