

**RSS EXAMINATION IN PUBLIC SOUTH EAST**

**STATEMENT BY CPRE SOUTH EAST: PARTICIPANT 7124**

**MATTER 2 SPATIAL STRATEGY**

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**Sub-matter 2A SPATIAL DISTRIBUTION**

**2A.1 Is the spatial strategy clear and soundly based? Have a sufficiently wide range of spatial options for accommodating new development (settlement form and location) been tested?**

1.1 The Plan has to present a comprehensive spatial strategy for the whole region. We find the strategy to be very urban based, and like many others, has an emphasis on the potential to accommodate future growth in the sub regions. CPRE has previously stated that the balance between urban and rural policy needs to be fully considered. The Rural Affairs Forum agreed with this point. It does not seem to us that the spatial distribution follows from the objectives of sustainability and deliverability. The presence of environmental and infrastructure constraints has produced a pattern not dissimilar to that in the existing regional guidance. This has allowed the spatial distribution to be quite soundly based, but lacking in innovative thinking.

1.2 The test of soundness should rest mainly on meeting infrastructure requirements, economic regeneration prospects as well as environmental efficiency and local acceptability. Preparation of the Plan has not been open-ended in its approach. It has followed a measured path avoiding the need to test more radical solutions. Only at a higher level of growth would options for significant sustainable urban extensions, or new settlements, have been contemplated. This is really looking over at the next field rather than considering even new settlements on previously developed land. The time horizon lends itself to wider considerations and options.

1.3 The growth areas, regeneration areas, areas of economic opportunity and sub regions, follow a similar pattern to those in RPG9. These may sometimes coincide, as with the Kent Thames Gateway being at once a regeneration area, a growth area and a sub region. With this in mind, it is helpful to have the classifications set out, and this may also help funding arrangements. The sub regions have been defined through local studies, but they should not be seen primarily as growth areas. Many contain areas of rural character or landscape value, which must be respected.

**2A.2 Is draft RSS's focus of concentrating development in urban areas appropriate? Is draft RSS's target of 60% of all new development on previously developed land sufficiently challenging (Policy CC8a)?**

2.1 The aim of concentrating development in urban areas is well established in regional policy. It matches the aims of continued urban regeneration and renaissance. Further aims about minimising land take and avoiding significant environmental impacts all combine to support the current focus. While urban concentration is valid, it is so only up to a point. Greater intensification of existing areas also raises

questions about their longer term viability. The spatial strategy must have regard to complex concepts such as sustainability and inclusion, but it should also aim to address and allow for human desires and aspirations in their various incarnations.

2.2 The primary focus of the Plan is on urban areas both for growth and new development. While this is welcome in principle, all development has to be balanced and sustainable. A work-a-day plan alone is not enough, since it is quality of life issues that most motivate people in the region. The better use of existing facilities and infrastructure is a prudent approach, but it may not meet all aspirations. To ensure a high quality of life in urban environments, green spaces and facilities such as recreation, faith, sports, and culture, should be both available and accessible.

2.3 A higher aspirational target of 75% of housing development and 85% of employment development on PDL is appropriate and likely to be workable in the region. Urban healthcare will require additional capacity due to demographic change. These facilities have to be developed in tandem with the proposed increases in urban populations. Skills attainment and education support the development of economically active communities. Facilities for education and skills training will be needed in tandem with new development. This could also be helpful in breaking the cycle of social deprivation when provided in disadvantaged areas.

**2A.3 How do the spatial strategy elements, particularly the regional Hubs, relate to the Diamonds in draft RES, and to the potential Growth Points? Is there a need for a hierarchy within the Hubs?**

3.1 The spatial strategy does not directly relate to the Diamonds in the RES or to the potential Growth Points. This does not mean there is an automatic conflict between the different elements. The key issue is whether all or some can proceed, and whether as a result, some form of hierarchy is needed to determine priorities. The need for land is also of special importance for the RSS, more so than the RES. It is clear that the two strategies originate from different ways of thinking, but the aim in the short term should be to consider how their legitimate aims might be combined.

3.2 The recent announcements from Government on Growth Points are relevant to the spatial distribution. These must be reflected and built into the RSS, but they should not pre-empt the scope for alteration. The status of Growth Points should be clarified by the Panel. It is not entirely clear whether they are intended mainly as a funding mechanism, building on agreed local policies, or whether they have gone beyond this. We are content to see Government taking action, especially if done in partnership with its agencies and local authorities. However, it would be preferable for the final Implementation Plan to be the agreed vehicle for making progress on locally generated development proposals. The wider spatial infrastructure aspects and implications need to be assessed and tied in. There is also a need for significant consultation on proposals of this magnitude. There is always the risk that concepts developed by councils have not been sufficiently aired or gained public acceptance.

**2A.4 Are the sub-regions identified appropriate and necessary? Does the draft RSS pay sufficient attention to the inter-relationships between sub-regions and the functional relationships between the sub-regions and other parts of the**

**region and beyond? Is there sufficient recognition of the roles of areas outside the sub-regions?**

4.1 We are not convinced that all the sub regions are necessary or well defined. We nevertheless recognise that functional sub regions have been identified in the South East for many years. The concept of working sub regions is valid, but there are too many and their purpose is not clear beyond forming clusters for expansion. An alternative function of sub regions is to provide greater definition for built up areas and focus resources on enhancement and improved liveability.

4.2 Attention should probably be focused on four primary sub regions: Milton Keynes, South Hampshire, Western Corridor and Kent Thames Gateway. As always, there is a balance to be struck, and the existing settlement pattern of these areas is also of great acknowledged value. Other sub regions may well play a lesser role; such as London Fringe and Central Oxfordshire, and even the Gatwick Area. This is not to suggest that they are absolved of development, but that the LDF process is probably adequate to define the development needs of those areas based on the overall guidance of the spatial strategy.

**2A.5 Hypothetically, if a case were made for higher regional housing levels, what would be the most appropriate approach to distribute the additional dwellings arising from these, taking account of economic, environmental and social implications?**

5.1 We are not looking for higher numbers of houses, but if the case were to be made, then a different approach would be needed. The preferable approach would be to concentrate attention on the sub regions rather to disperse the numbers throughout. This would in turn require a closer look at the hierarchy of sub regions and address those first. An established ranking would provide a guide, but each would need to be further tested and scrutinised to ensure planning constraints beyond 2016 were not likely be compromised.

5.2 Houses can only be provided where people might want to live. Any higher housing level would have to relate well to the context of the local economy, as well as its environment. An alternative would be to reconsider the sub regional context from scratch, and provide a new or more radical spatial solution. In this case, and hypothetically, the Panel would have to decide which sub regions had a sound basis and a measure of public support, before embarking on redistribution. There would also be case for suggesting that the additional growth might be best located at the areas in most need of regeneration and revitalisation, such as Kent Thames Gateway and the string of coastal towns. Given the timescale, it would not be an easy task.

*Following the sub-regional debates*

**2A.6 Hypothetically, what would be the implications of higher regional housing levels on:**

- water supply and waste water treatment;
  - transport infrastructure;
  - landscape, heritage and biodiversity assets;
- and to what extent could these be addressed?**

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