

**RSS EXAMINATION IN PUBLIC SOUTH EAST**

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

**MATTER 2C– RURAL, SMALL TOWNS AND BUILT ENVIRONMENT**

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**2C.1 Is there sufficient focus/explicit policy on rural issues (Box B1, Policy RE2, Policies H3, BE 5&6)?**

The simple answer is no; the rural parts of the South East form its fabric, and provide context and setting for the settlement pattern across the region. Managing and valuing that fabric is as important as managing the urban areas. The challenges to rural areas arise both internally from the changes in farm economics, and externally from the problems of success: the rural areas of the South East are particularly attractive as accessible places to live and visit. These pressures are changing the nature and character of rural communities, the patterns of farming and horticulture, and diversification of rural buildings and land areas to other uses, such as equestrian establishments and golf courses. Market demand for places to live in the rural South East, is making problems of housing affordability even more acutely felt in rural communities than in urban areas. The economics of services and retailing makes rural access to services a significant challenge.

The opportunity to be connected and work remotely is changing the nature of work that takes place in rural areas, and land based work is evolving including highly mechanised ‘smart’ farming and ‘countryside project’ work to manage environmental and habitat conservation. The high level of appreciation and interest in the countryside and healthier living is increasing rural tourism of all types.

There is a helpful definition of principles for sustainable rural communities, economies, environments and resources set out in Box B1. However, it is inadequate to relegate rural strategy to a short section and box in the introduction, with policy references through the document. The Plan has been presented as integrating rural policy development throughout the Plan, and while there is merit in this approach the reality is that rural issues appear as an add-on to an urban focus. A cross cutting policy on rural development might have made the link, but this is not present.

**2C.2 Are the needs of smaller towns adequately recognised in draft RSS (including Policy BE5)?**

The smaller towns of the South East are often those with distinctive historic character and a mixed, well connected community. They may well be towns that lost their former rail connections, and most are dependent on buses as the only public transport. This is often the vital service that connects the town to their rural hinterlands – they are the ‘hubs’ of the rural transport referred to in Policy T2. High levels of car dependent transport into and out of the town and a determination not to destroy the heart of the town to make way for car parks and larger development means that congestion is often nearly as much of a problem as in larger towns.

Policy BE5 reflects the character-based needs of smaller town appropriately, including the importance of employment, but their importance as ‘hubs’ for rural hinterlands should also be recognised. Assessment of needs should recognise that like larger towns they may contain deep seated needs and pockets of deprivation which may be less visible because the towns are small and outwardly prosperous. Access to services such as skills training, and sports facilities, may be less than in larger towns. Planning policy on retail development is particularly important as many of these towns are the places where local shops and local shops with produce from the rural hinterland are viable and need to be supported as far as is practical. The hinterland role of smaller towns should be recognised in BE5. In the pressured South East, no small town is far from the nearest big town, which creates a constant competitive challenge for the viability for retail, leisure and services. It is therefore vital that small towns are supported in regional policy.

### **2C.3 Is the draft RSS approach to the Built Environment soundly based and sufficiently regionally specific, particularly on suburban renewal and on the urban rural fringe?’**

It is considered that the revised Policy BE1 provides more and clearer guidance to local planning authorities and other bodies (e.g. English Partnerships) for the implementation of urban renaissance. The South East has a great many small and medium sized towns many of which need and want to deliver an ‘urban renaissance’. The Historic Character (para. 2.11) is referred to in the text, but not directly in the Policy. BE1 v refers only to underused historic buildings, not to the deeper importance of historic character which is now so often the most appropriate basis on which to plan and design urban renaissance in South East towns. The pioneering work of English Heritage in developing the concept of ‘Building-in-Context’ should be given more recognition. Policy BE7 on managing the historic environment should perhaps be more closely linked with BE1 on managing urban renaissance and CC12 on character of settlements.

With regard to the suburban policies (BE2 and BE3), we would again support both the inclusion and content of these two policies. The suburbs of the South East have been subject to considerable pressure for ‘ad hoc’ infill and densification as a result of interpretations of ‘brownfield’ land in PPG3. Significant backland development is now happening to a large degree in many suburban areas of the South East. While CPRE supports the overall objective of PPG3 to reduce urban sprawl into the countryside, we also believe that developments in suburban areas must be within the context of their character and needs assessment within policies and SPDs. Smaller towns have suffered from the demolition of a large old house to be replaced by flats. Greater density in such areas must be ‘appropriate’ to the surrounding character, and we hope the Panel agree.

Changes of character that result from suburban intensification must be subject to planning, to avoid risks of area decline and decay. Another tool for applying such objectives should be the Area Action Plans. The involvement of all local stakeholders through Neighbourhood Management Plans would enable local residents to contribute to the development of suburban policies and LPDs and provide more locally acceptable developments for areas needing renewal, but it should be recognised that a great deal of such development happens in a more ad hoc way on individual sites, and BE2 is therefore particularly important to avoid the need for renewal.

We support Policy BE4 (Managing the Urban Rural Fringe), and especially the inclusion of implementation guidelines. While we welcome the policy direction to apply the practice to Green Belt, we have highlighted elsewhere (in our statement on Matter 2B), that while Green Belts are often an essential planning tool to maintain coherent settlements, the countryside that comprises the Green Belt is sometimes in poor or neglected condition. There is a need for this to be easier to manage and be made more accessible and valued from an urban perspective.

The same arguments apply particularly to Strategic Gaps and local corridors, also noted in our statement on Matter 2B, and these should also be referred to under BE4 para. 2 point i. Such areas are much narrower than Green Belts and often have more local importance in the South East as they are more frequent and therefore very important in defining settlements. More active land management and greater access and landscape value to local residents will protect Green Belts, the strategic gaps and local corridors, from development intrusions. There needs to be a greater definition of the planning significance of Green Belt land other land in gaps. Not all local corridors have a planning significance in terms of defined land. The continued importance of the Green Belts must lie in their strategic value and in retaining their overall integrity.

**4 December 2006**