

## 8Hi.1 CPRE Surrey (7152)

### EXAMINATION IN PUBLIC OF SOUTH EAST PLAN

#### 8H London Fringe Statement by CPRE Surrey

#### 8Hi ROLE & ECONOMY

##### 8.H.i 1 Bearing in mind its geography and complex interrelationships with other sub-regions and London, what is the rationale for and role of this sub-region?

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- 1.1 Whilst supporting many of the policies contained in Section E5, CPRE Surrey questions the validity and soundness of this Sub-region. We have strong reservations about the Sub-region's name, rationale, and role. It is not clear how it will operate with and work alongside London Region and other neighbouring Sub-Regions. This aspect needs addressing in the Plan. We also feel that, although this is a densely populated area, there has been insufficient emphasis given to protecting and enhancing the environment. The Framework concentrates almost exclusively on issues of housing and the economy
- 1.2 CPRE Surrey considers that the underlying principles of the "London Fringe" Sub-region are not clearly explained. The "Introduction" to Section E (page 235) states that Sub-regional policies "are required to address specific strategic cross boundary issues within the South East that cannot be dealt with by individual or joint local development documents or by the policies in Section D". However, policies in E5 neither identify nor provide guidance on these specific issues and how they will be addressed.
- 1.3 CPRE Surrey has consistently expressed objection to the name "London Fringe" which is misleading and undesirable. An entity with this description has by definition to cover part of all the counties that border the capital and not just North Surrey and the Sevenoaks District of Kent. The negative name implies the eclipse of Surrey by a more dominant neighbour. Virtually all the other Sub-regions contain a geographical reference in their name which is taken from the Region itself. It is not clear why Surrey, with its community identity and long heritage, should not be treated similarly. The name "London Fringe" sends out the wrong signal, indicating suburbanization, encroachment and a subordinate role.
- 1.4 We consider that a far more appropriate name would be "Central and North Surrey". This name has clarity without the negative connotations.

- 1.5 The Statement of Strategy in Section C (paragraphs 4.5.3 on page 33 and 4.6.4 on page 36) needs to spell out that, unlike most other Sub-regions, the spatial policy to be emphasised in the “London Fringe” is one of CONSTRAINT (This approach was developed in the Surrey Structure Plan). This is vital if possible misinterpretation is to be avoided about the pace of future sustainable economic growth and housing development. A unifying set of policies are required which protect and enhance the environment whilst promoting sustainable development.
- 1.6 The aim must be to resist the outward spread of urban areas and limit new development to previously developed land by maintaining the Green Belt’s existing boundaries, thus preventing the coalescence of settlements and further encroachment on open space and countryside.
- 1.7 We accept the current boundary of the sub-region, (other than for the possible exclusion of the Sevenoaks area). This is based on the strategy of balancing the maintenance and enhancement of the environment with sustainable growth and the present housing allocations. However, should there be pressures to increase the number of dwellings and rate of economic growth, the basis of this Sub-regional strategy would have to be reviewed. We note that paragraph 57 of the Roger Tym report concluded that the London Fringe, together with the Gatwick Sub-region and Sussex Coast, would have the least potential to accommodate additional growth because of the planning and environmental constraints. We draw the Panel’s attention to the CPRE tranquillity map which illustrates how built-up this part of Surrey is. The Roger Tym study also shows that the London Fringe Sub-region has by far the smallest area of unconstrained land within 1 kilometre of urban areas.
- 1.8 Since the whole Sub-region falls within the Green Belt, increasing the housing allocation above that in the Plan would almost certainly involve major development on Green Belt greenfield sites and go completely against PPG2 and PPS3.
- 1.9 We therefore conclude that this should be an area of restraint, which can absorb the current allocation of housing and can support ‘smart growth’ but it is essential that the environment is not harmed and the quality of life is retained. Although the area has close links with London, the essential character of Surrey needs to be protected and enhanced.

## 8Hi.2 CPRE Surrey (7152)

**8.Hi.2 Is the sub-regional strategy an adequate response to the area's importance to London and to the South East more generally (Policy LF1)? Does it take proper account of the environmental attributes and constraints affecting the sub-region?**

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- 1.1 CPRE Surrey agrees with the first sentence of Policy LF1 but it requires a reference to the permanence of the Green Belt. We are disappointed that the subsequent paragraphs are primarily concerned with the economy, employment, housing, design in urban areas and infrastructure. The environment only appears in the last paragraph with a reference to biodiversity and the rural parts of the sub-region. Management of the Green Belt through the Green Arc (South West) Initiative is relegated to Policy LF10 when it should have more prominence as a core strategy. Overall, there is a lack of emphasis on protecting and enhancing the environment.
- 1.2 Reference is required in the core strategy to the nationally important Surrey Hills AONB which covers approximately a quarter of the County and a large percentage of the Sub-region. CPRE Surrey believes that the surrounding Area of Great Landscape Value could be absorbed into the AONB. One of the most important features of the Sub-Region for London and other surrounding areas is the provision of nearby high quality countryside that is readily accessible by public transport.
- 1.3 We have significant concerns about the maintenance of the urban edge and that there will be pressures to agree to urban extensions for various purposes. This is unnecessary as the CPRE document '**Policy-based evidence making**' illustrates that our towns and cities are less crowded than many of our European neighbours. In addition, CPRE's publication "**Compact Sustainable Communities**" shows how densities can be increased through the provision of well planned, higher density mixed use urban development that meets housing needs, improves quality of life and protects the environment.
- 1.5 Although there are close relationships with London, we do not consider that the continuation of the London urban corridors through the sub-region are appropriate because of the consequent harm to the Green

## 8Hi.3 Surrey CPRE Surrey (7152)

**8Hi.3 Do Policies LF1 (I-iii) and LF6 provide appropriate and clear guidance on the steps that should be taken by LPAs and other stakeholders to secure the future development of the Sub-regional economy (Policies LF1 and LF6)?**

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- 1.1 There is little which is specific to the London Fringe in these policies. We do not consider that detailed guidance is appropriate as this is a matter for the LDFs, but if the region is to be divided into sub-regions, the policies must add detail to the Regional Policy Framework.
- 1.2 Farming is still in crisis, with widespread comparative deprivation as a result. Agriculture is not mentioned but it represents an essential strategic commitment that needs long term protection not only for food production and possible energy producing crops (particularly with increasing global warming), but also on the grounds of tourism, bio-diversity and environmental quality. LPAs need to become more involved in planning for a prosperous countryside.
- 1.3 The guidance in the overall strategy may prove more aspirational than realistic. Surrey has outperformed other areas in the past but cannot necessarily be expected to maintain this growth rate in the light of congestion, infrastructure deficit, skills shortages, and other factors. Is it realistic to predict that a consistent average 3% growth rate can be achieved across the South East for the next 10 let alone for 20 years? The Policies assume that growth can be maintained, and yet the growth rate at present is below 3%. There is clearly a strong case for continually monitoring performance but we have reservations on the ability of LPAs to influence growth.
- 1.4 There is no encouragement of smart growth, despite the fact that, in this overdeveloped and congested area, it is the form of economic growth most likely to be sustainable and retain the quality of life.

## 8Hi.4 CPRE Surrey (7152)

### 8Hi4 What are the implications of the apparent serious misalignment in growth of houses and jobs?

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- 1.1 The demand for market housing in this Sub-Region is insatiable. There is, however, a capacity limit to development beyond which any concept of sustainability will be hopelessly compromised. The concept that everyone will be able to choose where they wish to live is not credible.
- 1.2 We do not believe that it will be possible to closely align houses and jobs in the Sub-region because of its proximity to London and the difficulties in calculating commuter flows and environmental capacity limits. It is particularly difficult during a period of rapid demographic, economic and social change.
- 1.3 Nevertheless, if a comparison is made between the proposed targets for employment and new homes 2006 – 2026 for each of the sub –regions (doubling employment where only forecast for a 10 year period), the ratio of jobs to new housing for the London Fringe is 3.92 jobs/ for each dwelling which is much higher than that for the other subregions. The Western Corridor ratio is 2.49/1 and for most other regions is about 1/1. There is no justification for this and it is likely to result in pressures for even more housing or an increase in inward commuting. Further information is required on how this apparent discrepancy can be overcome. We suggest that the proposed employment levels are probably far too high, presumably based on past trends, and are unsustainable.

## 8Hi.5 CPRE Surrey (7152)

### 8Hi5 Does the proposed strategy adequately reflect the role and potential of Guildford, Woking and Redhill (Policies LF4 and LF7)?

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- 1.1 CPRE Surrey has reservations about the role and potential expansion of the three hubs in this Sub-region and notes that in paragraph 1.5, the Plan acknowledges that there is limited scope for expansion. However, if there are to be regional hubs, we broadly support Policies LF 4 and 7 and their emphasis on the concentration of development within existing built-up areas. Paragraph 4.95 on page 37 of the Roger Tym Report makes clear just how tightly surrounded potential growth centres are in the Sub-regions (and particularly in the London Fringe) by environmental and planning designations and the requirements for natural resource protection.
- 1.2 The three hubs selected are each surrounded by Metropolitan Green Belt, two of the three Regional Hubs are affected by the Thames Basin Heaths SPA, both Guildford and Redhill have AONB constraints and development at Guildford and Woking has to take account of the River Wey.
- 1.3 The three Regional Hubs were originally selected because they were Transport Hubs and even for this purpose they have substantial shortcomings. Guildford, Woking and Redhill all experience major congestion with complicated gyratory systems within their town centres. The road links between Guildford and Woking are notoriously congested at peak hours.
- 1.4 The schematic pattern of spokes shown on Maps C1 and T2 for the London Fringe Sub-Region is misleading. It also implies, incorrectly, that direct road and rail communications exist (eg Guildford to Crawley).
- 1.5 All the rail links require upgrading if passenger use is to be increased to meet demand. The predicted doubling of SWT passenger traffic to Waterloo by 2016 is not credible in the light of these infrastructure requirements and increasing fare costs.
- 1.6 None of the three hubs selected has a regional significance or population size comparable to cities such as Brighton, Oxford, and Southampton.
- 1.7 It is against common sense to have 2 “Regional” Hubs at Guildford and Woking within 5 miles of one another. The position of Redhill between Croydon and Crawley is also difficult because of its need to compete with these two larger key centres and because of its road and rail infrastructure shortcomings. Should the Panel decide to retain Redhill as a hub, CPRE Surrey sees no merit in including Reigate which has a small historic centre with little scope for expansion.

- 1.8 We conclude that Woking and Redhill have limited potential as hubs and that even Guildford is constrained by the Green Belt and AONB, traffic congestion and deficiencies in its transport links.