

Matter 1A/South East England Regional Assembly



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Matter IA: Approach and Levels of Growth

IA.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).

The Challenges

1. The South East has the most successful regional economy in the UK (excluding London), and the overall competitiveness of the nation and the quality of its public services is dependent upon the region's continued success. The South East is also a very diverse region with variations in economic performance and social deprivation as large as anywhere in the UK, and a high quality environment with over one third of the region's land area protected by national landscape designations.
2. The region's economic base is complementary to London's with the capital dependent on the South East's labour force, transport infrastructure, and business relationships, particularly in advanced producer services¹. As the international gateway to the UK for both passengers and freight, the South East plays a distinctive and vital role to the functioning of the UK economy as a whole, not just London.
3. Despite the fact that around 80% of the region's land mass is considered to be rural, around 80% of the population live within the urban areas, helping to focus service and public transport provision and restrict the impact on the region's valuable environmental assets outside these areas.
4. However, this success has not been without some significant costs to the region and raises concerns about the long term impact on the overall quality of life, such as:
 - congested transport systems, many of which serve a vital regional, national and international function;
 - increasing pressure on existing infrastructure and land supply, particularly in urban areas, and limited ability to deliver the requisite infrastructure in a timely manner;
 - strong demand for highly skilled workforce which in turn drives up labour prices and attracts migrants;
 - high house prices resulting in housing accessibility problems for many households in the region;

¹ See for example: South East England in North West Europe: Trends and Messages from POLYNET http://www.southeast-ra.gov.uk/southeastplan/publications/research_reports.html

- significant intra-regional variations in levels of housing development vis a vis planning targets, but recent improvements in completion rates for the region as a whole;
- increasing pressure on finite natural resources including water resources, energy supply and protected habitats.

The Plan's response

5. It is important to recognise that in responding to the challenges faced in the South East, the Plan does not start with a blank sheet of paper. It builds upon the strategy in current regional planning policy (RPG9) and subsequent partial reviews, and interprets international and national policy, applying it to the particular needs of the region. It is also important to recognise that the approach proposed does not rely on the land-use planning system alone. Successful delivery in the long term depends upon a number of other factors as outlined in the Implementation Plan, and on a high level of ownership and 'buy-in' from the relevant organisations, as well as from the public in general.
6. The Plan acknowledges that these challenges have different emphases across the region and may require differing policy approaches. Hence, the identification of nine sub-regional strategies to address particular strategic challenges where local interventions alone will not be sufficient.
7. The key principles of the Plan's approach are:
 - Acknowledging the region's gateway role and identifying specific proposals to ensure that it is maintained and enhanced to the benefit of the UK as a whole;
 - Focusing the necessary growth and development, needed to sustain quality of life in the region, in the most sustainable locations (See Matter 2A);
 - Establishing challenging targets for the delivery of affordable housing across the region, and emphasising the need to provide quality homes in mixed, sustainable communities in line with recent national policy (e.g. Sustainable Communities Plan, PPS1 and draft PPS3); (See Matters 4A and 4B);
 - Prioritising the provision of infrastructure to support growth, identifying for the first time the critical infrastructure needs at a regional and sub-regional level, and setting out key roles and responsibilities of all relevant delivery agencies; (See Matters 1D and 10A);
 - Recognising the need for new infrastructure delivery mechanisms and proposing innovative solutions informed by best practice in the Growth Areas (Matters 1D and 10A);
 - Anticipating national policy developments in setting challenging targets for reducing the consumption of natural resources in relation to water efficiency, renewable energy and waste management and adopting a manage and invest approach to managing the demand for travel. (See Matters 1D, 1E and 4B.3);
 - Being realistic and recognising that the overall vision for the healthy region will only be achieved if we adopt behavioural changes to secure more sustainable patterns of development and other types of production and

consumption – and identifying many of these within the Implementation Plan and the Climate Change Adaptation and Implementation Plan².

IA.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)?

1. The Plan's vision is set out in Section C para 1.4. The vision reflects the results of a wide range of debates and discussion, including the largest ever regional planning consultation, informed by extensive technical research. It also reflects the central messages of the South East Integrated Regional Framework (IRF), which establishes a shared vision and objectives for integrated working and sustainable development of the region.
2. A consistent and clear message from these discussions and the considerable work undertaken with a wide range of stakeholders in developing the IRF was that maintaining and improving the quality of life in the region is of paramount importance.
3. It was felt that this vision was best encapsulated in terms of the 'health' of the region – a healthy region will be performing well in all critical aspects.
4. In order to retain a clear and succinct emphasis in the vision statement it was felt appropriate to focus on four key dimensions, which the rest of the Plan then builds upon:
 - Well-being of the region's citizens
 - Vitality of the region's economy
 - Wealth of the region's environment
 - Prudent use of natural resources.
5. It is widely acknowledged, including in the Government's Health White Paper, that health (in its broadest sense) is influenced by a wide range of factors. To achieve this requires a considerable range of policy and other interventions, and the Plan sets out a wide range of policies which will help drive forward the delivery of the vision, for example seeking to ensure delivery of:
 - Mixed and inclusive environments
 - Decent and secure housing stock
 - Employment opportunities
 - Service accessibility
 - Provision of cultural and leisure facilities
 - Air quality
 - Opportunities for healthy recreation

²http://www.southeast-ra.gov.uk/southeastplan/plan/supporting_information.html#climate_change

6. The core Statement of Policy (Section C para 2.2.1) sets out the objectives of the Plan, building on the vision. These are set firmly in the context of a 'plan, monitor and manage' approach, providing a challenging and clear focus but retaining flexibility to respond to the uncertainties that are inherent in the longer term.
7. In delivering the Plan vision, land use planning policies are a key element of ensuring the vision is delivered, but these will be part of a package of wider actions and investments which will be required. The Implementation Plan is therefore a critical and integral part of the Plan, setting out how the vision will be achieved (Matter 1D). Combined with the robust monitoring systems set out in the Plan, this will ensure that the impacts of the Plan are understood and modification undertaken if required ensuring that the core vision is delivered.

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?

1. The Plan sets out a positive and robust strategy for the next 20 years, recognising the range of uncertainties that are inherent in setting the scale of development over a longer time horizon. For example:
 - Changes in the global economy;
 - The effects of climate change;
 - Changes in government and as a result, in planning policies.

The Assembly has therefore produced a strategy which is both flexible and deliverable, and includes robust monitoring processes.

2. The evidence base underpinning the Plan is the most comprehensive to date for any regional strategy. It has looked at household projections and economic growth forecasts, housing need and demand, the environmental, social and economic implications of development and the impact of development upon existing or planned infrastructure. Alongside this information it has taken into account public opinion and the representative views of the wide-ranging interests of Assembly partners. The Sustainability Appraisal has been an integral part of the decision making process, and more information is set out on this in section 1A.4.
3. The concept of reasonableness in the Plan is intended to demonstrate that a balanced assessment of environmental, economic and social considerations, plus other valid factors including public opinion and deliverability, have been taken into account in making the spatial planning decisions. The Assembly has come to a considered view that the level of growth set out in the draft Plan reflects a sustainable approach to development that takes into account the delivery mechanisms available to implement the Plan.

IA.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?

Sustainability Appraisal

1. The requirement to undertake an appraisal of the Draft South East Plan arises from:
 - The requirement under EU Directive 2001/42 for a Strategic Environmental Assessment (SEA) to be undertaken of Regional Spatial Strategies;
 - The requirement of the Planning Compulsory Act 2004 for a Sustainability Appraisal to be undertaken of Regional Spatial Strategies.
2. The approach adopted by the Regional Assembly combines both of these requirements into one single process. The appraisal of the Draft South East Plan took place in parallel with the plan making process thereby ensuring that the opportunity to inform and shape the content of the Draft South East Plan was maximised. This ensured that the Assembly complied with the requirements of the SEA Directive which requires to ensure that the information in the Environmental Report and the responses to consultation and taken into account during the preparation of the plan or programme and before the final decision is taken to adopt it.
3. Annex F of the Final Sustainability Appraisal Report on the Draft South East Plan summarises how sustainability considerations have been integrated into the South East Plan.
4. At each decision making point in the plan making process the decision makers have had available to them information on the key issues identified through the Sustainability Appraisal. Annex F of the Final Sustainability Appraisal Report provides an audit trail of the key meetings and the means by which decision makers were informed of the key issues.
5. In addition the findings and recommendations of the Sustainability Appraisal were used by Assembly secretariat to inform the development of the policies and proposals set out in the Draft South East Plan. Again, Annex F provides an audit trail of this process.

Appropriate Assessment

6. Consideration has been given throughout the process of drafting the regional and sub-regional spatial strategies and policies to the network of Natura 2000 sites and the need to protect these sites. Policy NRM4 provides the highest protection to such sites, reflecting PPS9.

7. An appropriate assessment (AA) on the draft South East Plan and revised Implementation Plan (September 2006) has been undertaken by consultants following the ruling of the European Court of Justice in October 2005 requiring that land use plans are subject to assessment under the Habitats Directive. The Regional Planning Committee will consider its conclusions on 20 November. The AA will be used in testing and finalising the RSS, and will identify, where appropriate, measures to avoid and / or mitigate the potential effects of Plan policies, for inclusion into the Plan and / or the Implementation Plan.
8. Given that the Plan is a strategic one, potential avoidance and mitigation measures will relate to those broad issues where it has not been possible to demonstrate conclusively that there will be no adverse effects to the integrity of one or more sites as a result of an assessment of 'in combination' effects and the application of the precautionary principle. In the main, the detailed application of these avoidance and mitigation measures to individual sites and proposals must follow at a later date when site/project specific information is available
9. Further information is provided in the paper 'Appropriate Assessment of the draft South East Plan'³ – Extract from Final report 20 October 2006'.

³ http://www.southeast-ra.gov.uk/southeastplan/publications/research/appropriate_assessment-process_and_methodology-oct06.pdf