

# EAST OF ENGLAND PLAN

## December 2004

### Examination in Public

1 November – 16 December 2005 and  
17 January – 1 March 2006

## Report of the Panel



**June 2006**  
**Volume I - Report**



## EAST OF ENGLAND PLAN EXAMINATION IN PUBLIC

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Dear Secretary of State

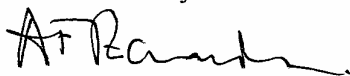
### **Regional Spatial Strategy for the East of England**

We have pleasure in submitting to you our Panel Report following the Examination in Public of the draft East of England Plan. The full report, including a second volume containing the Appendices has also been made available to the Government Office for the East of England. It is inevitably a large report. We have brought together some of the key issues in a brief Overview in Chapter 2 which we hope you will find convenient.

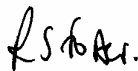
The Examination faced a challenging agenda, and this is reflected in our recommendations for changes to the draft Plan. The volume of development, over half a million new homes between 2001 and 2021, will be controversial for many. Alongside this the Plan has to deal effectively with the imperatives of climate change and ensure the creation of sustainable communities. Implementing it will be a challenge for Government, involving the responsibilities not only of your own Department but also particularly Transport and Environment, Food and Rural Affairs as well as a number of others, not least the Treasury, since there is also very widespread concern about whether resources will be found to make all this development truly sustainable.

We are sending copies of this letter to Douglas Alexander and David Miliband.

Yours faithfully



Alan Richardson  
Chairman



Roy Foster  
Inspector

Encls/.

cc Rt Hon Douglas Alexander MP, Secretary of State, DfT  
Rt Hon David Miliband MP, Secretary of State, DEFRA



## CONTENTS

		Page Number
	<b>Preface</b>	
CHAPTER 1	<b>Introduction</b>	1
CHAPTER 2	<b>Overview</b>	3
CHAPTER 3	<b>Context, Soundness, Strategic Issues and Objectives</b>	11
CHAPTER 4	<b>Spatial Strategy</b>	23
CHAPTER 5	<b>Sub-Regions/Locations</b>	37
CHAPTER 6	<b>Economic Development, Retail and Tourism</b>	99
CHAPTER 7	<b>Housing</b>	113
CHAPTER 8	<b>Regional Transport Strategy</b>	135
CHAPTER 9	<b>Environment, Water, Renewable Energy</b>	149
CHAPTER 10	<b>Waste</b>	165
CHAPTER 11	<b>Implementation and Delivery, Monitoring and Review</b>	173
CHAPTER 12	<b>Schedule of Recommendations</b>	185
APPENDIX A	<b>Abbreviations used in Report</b>	249
<b>VOLUME II</b>	<b>APPENDICES</b>	
APPENDIX B	<b>List of Matters and Participants</b>	
APPENDIX C	<b>Examination Timetable</b>	
APPENDIX D	<b>Examination Library Documents</b>	
APPENDIX E	<b>Panel Notes for Examination Sessions</b>	



## PREFACE

The East of England Plan is a draft revision to the Regional Spatial Strategy (RSS) for the East of England; it will cover Bedfordshire, Luton, Cambridgeshire, Peterborough, Hertfordshire, Essex, Southend-on-Sea, Thurrock, Norfolk and Suffolk.

The draft Plan was produced by the Regional Assembly for the East of England (EERA); it is the first such draft under the Planning and Compulsory Purchase Act 2004 and will replace both the existing Regional Planning Guidance (RPG6 and RPG9) and the County Structure Plans (SP) which previously gave guidance. The draft Plan was accompanied by a Sustainability Appraisal Report [SA]; this report incorporated an assessment to comply with the Strategic Environmental Assessment [SEA] Directive. In addition, a Statement of Pre Submission Consultation also accompanied the Draft Plan.

The draft Plan was placed on deposit for consultation purposes from December 2004 to March 2005. As a result, more than 21,000 responses were received from individuals, bodies and groups comprising over 34,000 separate statements of support, observation or objection.

We were appointed by the First Secretary of State to conduct an Examination in Public of selected matters arising out of the draft Plan. Based on the objections and representations received, thirty main issues and sub-issues were selected by the Panel for examination, in consultation with the Regional Assembly and Government Office for the East (GO-E). We also consulted on the choice of participants at the Examination. The draft list of Matters and Participants was published on 1 June 2005 for a 28 day consultation period; the comments received were placed in the Examination Library (EXAM7) and the final list was published on 29 July 2005 (Matters 1-7 and 9) and 18 August 2005 (Matter 8). In total over three hundred participants were invited, with around 210 taking up their invitations, including all the county and unitary authorities, all the district and borough councils and representatives of the various associations of town and parish councils.

The List of Matters and Participants is reproduced as Appendix B to this report. All participants were given the opportunity to submit statements prior to the Examination and these were circulated in advance to all those participating in the relevant sessions. Statements prepared by the Regional Assembly were likewise circulated. Written statements submitted by those who were invited but unable to attend and those to whom we were unable to issue an invitation have also been taken into account. A Library was available both prior to and during the Examination where copies of all statements and other relevant Documents were available for inspection. A list of the Library Documents is at Appendix D.

Three Preliminary Meetings took place on 14 June, 19 July and 14 September 2005. The purpose of these Meetings was to explain the nature of the proceedings and to allow an opportunity for the Panel to address any questions on how the Examination would be run. In addition, the Panel held several Seminar sessions which were open to all participants and the public. The seminars were on: Strategic Highway Network and Water Resources (19 July 2005); Regional Planning Assessment for the Railway, Population and Household Growth in the East of England, Housing and Employment Alignment, Housing Supply (14 and 15 September 2005) and Existing Waste Facility Capacity and Future Needs in the East of England and the Apportionment of Waste to its sub-regions (28 November 2005). The Examination was held over a period of twelve weeks, between 1 November and 16 December 2005 and 17 January and 1 March 2006 and sat for approximately 240 hours. The Examination was recorded onto compact disks and a complete set comprises some 250 CDs. The detailed timetable is at Appendix C.

During the course of the Examination there were various changes to the evidence base including new Planning Policy Statements, draft Planning Policy Statements and a new Government Waste Strategy Review (MNW13). The Panel invited and took into account supplementary written submissions on new information and announcements that occurred during the Examination process, including EERA's proposed new Policy IMP2, the Government's response to the Barker Review and new draft PPS3, the Environment Agency's note on wastewater treatment issues and the new ODPM Household Projections that appeared in March 2006 after the close of the Examination.

The Panel spent several days prior to the Examination touring the Region, including visiting locations relevant to the matters being examined. Further visits took place during and after the Examination.

A list of the abbreviations used in the report is at Appendix A.

### **Panel**

Chairman: Mr Alan Richardson BA MPhil MRTPI  
Inspector: Mr Roy Foster MA MRTPI  
Assisted by: Mr Chris White BSc DipTP MRTPI  
Higher Planning Officer from the Planning Inspectorate

### **Secretariat:**

Panel Secretary: Mrs Pam Perceval-Maxwell  
Panel Assistant: Ms Jo Laver

### **Acknowledgements**

We are grateful to everybody who contributed or helped in running the EiP. The team of the East of England Regional Assembly contributed a great deal, often under difficult circumstances, before and during the EiP, and in trying to meet our requests for information and additional work. Thanks are due to all the participants who contributed positively and responded to our requirements and deadlines for submitting material. We would particularly like to thank the Panel's own small team of Chris White, Planning Officer from the Planning Inspectorate, Jo Laver the Panel Assistant helped by Ronan O'Loughlin, and finally Pam Perceval-Maxwell, Panel Secretary, without whose dedication, professionalism and exceptional hard work it would not have been possible to complete the EiP and produce this report in the time available.



## CHAPTER 1 - INTRODUCTION

- 1.1 This report results from a long and complex Examination in Public (EiP), and is therefore inevitably lengthy. The EiP discussions themselves are only part of the inputs to our conclusions and recommendations. We have also taken account of a great deal of written material, including the original responses to consultation on the draft Plan, the written submissions of participants, and many background documents submitted to the EiP. The EiP discussions and seminar sessions were held in public and are a matter of record – it is not the purpose of this report to reproduce them in detail.
- 1.2 Our report concentrates on presenting our conclusions and recommendations for changes we consider the Secretary of State should make to the draft Plan. In doing so we have not sought to lay out the whole gamut of evidence and argument that led to each conclusion. To have done so would have made a report of immense length and complexity and would not in our view have aided clarity. Instead of this we have adduced only so much reasoning as is necessary to explain the basis for the view we have reached. The fact that a piece of argument or evidence is not mentioned does not mean it has been ignored. We believe those who participated in the EiP will recognise the background to the decisions we have reached. Those who are not familiar with the EiP may be helped by the Panel Notes reproduced in Appendix E, in which we briefly summarised the issues raised in each of the Matters before they were discussed.
- 1.3 We have structured our report so as to correspond broadly with the order of the submitted draft Plan, although our recommendations entail some reordering of the draft Plan. Following this introduction and the broad overview in the next chapter, the numbering of our chapters and recommendations coincides with the chapters of the draft Plan (except that our Chapter 10 deals with waste, which we recommend should form a separate section of the Plan, and not draft Plan Chapter 10 “Culture”, which was not examined in the EiP). We believe this will be of help to readers who are familiar with the draft Plan, but it does mean that the Matters as discussed at the EiP are not covered in order. The table below may help to indicate how these relate:

<b>Report Chapters</b>	<b>Plan sections</b>	<b>EiP Matters</b>
3. Context, Objectives	3: Vision and Objectives	1 (+ all others)
4. Spatial strategy	4: SS Policies (& sub-regions)	1, 2A, 2B, 8 (Part)
5. Sub-regions/ locations	5: Sub-regional policies	8A to 8N
6. Jobs, economy, retail	6: “E” policies	1C, 7, others
7. Housing	7: “H” policies parts of others	1B, 8 (parts), 4
8. Regional transport strategy	8: “T” policies	3
9. Environment, water, renewable energy	9: “ENV”, other policies	1D,5A-B (8H1), 5C
10. Waste	9: ENV10 – 14	6
11. Implementation & delivery, monitoring and review	11: “IMP” policies, etc	9

- 1.4 While the order above shows how the report tracks the structure of the submitted draft Plan, the final RSS, as we recommend it should be changed, will be different. After the Core Strategy will come the main thematic policies, headed by those for Environment, then Economy, Housing, Transport and others, with the sub-regional policies immediately before the Implementation section. Our recommendations should speak for themselves. They are clearly distinguished at the end of each chapter (or each sub-

regional section in Chapter 5) and are referenced in the text as appropriate. We have not provided an executive summary of the report. There is a danger with such summaries that they become used in preference to the full text, and may convey a partial emphasis that is not borne out by the full text. We naturally hope that anyone using this report will read it all, or at least will read that part of the text that supports any recommendation they are interested in. However, to give a broad appreciation of where our conclusions lead, we have included a short overview in the next chapter. That overview also serves to set out a few points arising from the process which do not fit easily into a later chapter.

- 1.5 Inevitably there were issues that arose at several points in the EiP, for example in both the general and the sub-regional Matters. These are reflected in this report, although we have tried to avoid too much repetition. Where an issue is mentioned more than once we have generally included cross-references, and sought to keep the main discussion of that issue close to where any relevant recommendations are made. One important case where this is not entirely possible is in the district housing allocations in Policy H1, which are the subject of a consolidated recommendation in Chapter 7. However, the main consideration of issues relating to sub-regions and individual Districts, and the conclusions which have led to our recommended housing figure, will be found in the relevant part of the sub-regional discussion in Chapter 5. For ease of understanding Chapter 12 details all of our recommendations and gives the full text of any policies to which we are recommending changes.
- 1.6 During the EiP and the process leading up to it, there were a number of announcements and publications which made for an ever changing strategic policy context and evidence base to the consideration of the draft Plan. Where these have occurred and have contributed to our deliberations, it is mentioned in the relevant chapter, and we do not recount them here. One administrative change which occurred well into the writing of this report was the change of name of the Government Department responsible for planning. Although we now submit this report to the Secretary of State for Communities and Local Government, we have not changed references to ODPM that appear in the text, as that was the title of the Department that contributed to the EiP. Obviously it will now be for DCLG to take matters forward.

## CHAPTER 2 - OVERVIEW

- 2.1 The East of England Plan will be the new Regional Spatial Strategy (RSS) providing strategic guidance for the region's development up to the year 2021. As such it has to confront a tough agenda of major issues, and this was reflected in the scope of the Examination in Public as well as in the responses to consultation on the draft Plan. There were over 21,000, an unprecedented number, many of them in response to specific major proposals. The main lines of argument were unsurprising: the development sector argued the draft Plan proposed far too little growth, while environmental organisations and local groups felt there was too much, and not enough concern for environmental issues. Local authorities took up various positions between these two main camps, and evinced concerns about investment in infrastructure. At the EiP participants were often focused on presenting their own arguments rather than listening to others. Our job was to listen to everybody, to probe and to conduct an interactive debate. At the end of it we have sought to synthesise sound conclusions and recommendations for improving the RSS, applying our own independent judgement to all the matters before us.
- 2.2 In the next Chapter we consider how the main agenda for the RSS is set by the issues of growth and the issues for the environment and climate change. For both agendas recent Government policy announcements have upped the ante. While some participants may have seen this as a contest to be decided in favour of one camp or the other, there is also a growing realisation that the real task is to produce a strategy which addresses both agendas adequately. Much of our report leads to proposals which seek to strengthen the Plan in dealing with one without weakening it in relation to the other. We will not recount in this overview the extensive arguments about growth, climate change and the environment which are covered in the later Chapters. There are, however, some broader points that should be pulled together here.
- 2.3 On climate change it is obvious that one region, even a busy and well populated one like the East of England, has a limited impact on the global trend. In our view that does not mean it is acceptable to ignore it and plan ahead in the hope that it will all be dealt with "elsewhere". With this and other aspects of the environmental impact of the region and its development it is important to show how the RSS is making a contribution to sustainable development. As we have remarked in paragraph 3.18 truly sustainable development will mean a marked change, indeed a reversal, of the habits and attitudes of the region and its people to, among other things, water use, energy consumption and waste. The RSS, with the changes we propose, aims to provide a framework for creating the necessary conditions for this. Necessary but not sufficient because without action going well outside the remit of the RSS and the planning system the changes needed to secure truly sustainable development will not occur. Those actions will be a challenge to joined-up government, involving the local and regional tiers and, at national level, other Departments including DfT, DEFRA and agencies such as the Environment Agency besides the DCLG as the "parent" department for the RSS. Not least they will be a challenge to people and businesses in the East of England. In setting the RSS in this context we believe we are reflecting the principles outlined in the UK Sustainable Development Strategy "Securing the Future".
- 2.4 The issues concerning water require special mention, as they affect the East of England more than most other regions. Water supply, and to a degree wastewater treatment, water quality and flooding, were raised as concerns at an early stage by participants and

in the SEA. It was clear from our seminar presentation by the EA that increasingly unsustainable water abstraction and constraints on supply are serious issues for the region as a whole, but are especially critical in some of the central and southern parts in line for considerable development. We reiterate here the essential point that, by whatever route it is achieved, all new development in the region must secure water savings of at least 25% over current consumption. Although we have taken on board the EA's strategy and tactics for dealing with water supply and wastewater issues for this RSS, we believe they leave some wider questions about the way these matters are addressed.

- 2.5 Where we discuss this in Chapter 9 we note that the traditional approach has been for the planning process to decide the quantity and location of development, and then for the water industry to bring forward the infrastructure and other measures necessary to cope with the demand that arises. We appreciate that this follows from the statutory duty to supply, and also that without an idea of future demand on a regional and sub-regional level it is difficult for the water industry to make its own plans. However those plans also have long lead times, resource implications and environmental impacts within the region and, increasingly, outside it. In effect by making them follow regional spatial planning rather than being part of it, we may be closing options for water industry development before their viability and environmental implications can be assessed. If, in the event, they should prove unviable or unacceptable, the only recourse for EA and the industry is then to intervene to delay or try to alter planned development at what may be an advanced stage.
- 2.6 The above dilemma is one reason (but not the only one) why we have suggested that longer term spatial options for development should be considered in the RSS review and not determined now. It is important in our view that in that review the EA and the industry play a more pro-active and inter-active role in the strategic planning process. It may be that in the past they have not realised to the full the power they can and probably should exercise in helping to generate strategic plans as well as implementing them.
- 2.7 Turning to the growth agenda, whether this is thought of in economic terms, or population and housing, the prospect of strong growth for the East of England is one of the dominant issues for the RSS. In economic terms the region's overall position is generally buoyant although there are clearly both urban and rural areas where this is far from the case. As discussed in Chapter 6, however, the picture is one of widely differing employment forecasts and difficulties over sources and consistency of data and methodologies for considering policy. Against this background the idea of a "jobs led strategy" is largely illusory and the limits to "sound science" begin to be apparent.
- 2.8 Bearing in mind the limited influence that planning has on job creation, we have reservations about an approach which appears to be based on precise measures of these matters or to shovel forecast jobs from one part of the region to another. Although it is easy to criticise, neither we nor anyone else was in a position to put anything better in place of the work that has been done. The policy will clearly be supported by EEDA's interventions. Overall we find EERA's basic policy stance, of taking account of the "alignment" between homes and jobs and seeking to ensure the Plan moves towards greater rather than less alignment, to be rational. Our proposals generally strengthen this thrust, while recognising that the region is not an economic island, especially as regards its relationship with London.
- 2.9 EERA's approach, of linking jobs and housing, brings us down to the central issue about growth, which is about people and homes – how many and where will they be. The message of successive household projections is clear, and we discuss their

implications in Chapter 7. Projections are, as Government and many others have stressed, merely statistical exercises and do not dictate policy. This does not mean that they can just be wished away as fiction invented by Government or developers to suit their own ends. The projections indicate the scale of real housing needs that are likely to be facing real people during the plan period. As the HBF said one must address the full size of the problem, and if the solution does not meet it, then be clear about the implications. The Government's approach to the issues of housing and growth is clear from the Sustainable Communities Plan and the response to the Barker review of housing. It is important to remember that EERA, in the original RPG review that resulted in the "banked draft", sought to address the region's expected household growth in full. What has happened since then is that more recent projections and the Government's policy towards meeting housing needs have both raised the bar considerably.

- 2.10 The view of many in the East of England, especially in the southern half, is that the region is up against capacity constraints and the growth should go "elsewhere" – generally meaning further north. Across the country this has in fact been an implicit approach for many years. Plans in the north have generally "over-provided" against projected household requirements while provision for housing in southern England has tended to lag behind. This is now seen as part of the problem that needs to be addressed in the south. Our approach, as explained in Chapter 7, has been to consider the housing provision for the region and its parts against all the issues – the strong upward pressures, the constraints, the opportunities, the urgency of the need for delivery, and the principles of sustainable communities. Our conclusions increase the RSS housing provision by 27,500 homes. This is more – by half as much again – than the addition, generally taken to be 18,000, sought by Lord Rooker in 2004. We should emphasise that our proposal is not a response to Lord Rooker's request which related specifically to the LSCP growth area. It is a response to the circumstances as we found them across the region.
- 2.11 Despite raising the regional housing provision, our proposals leave it well below the total implied by the latest ODPM household projections, let alone any higher level thought necessary to address current and historic housing market issues. There was no shortage of "offers" to build thousands more homes in some parts of the region, which we have not taken up. It is right that we should explain why. The first point is that our proposals, rooted in what we find feasible and sustainable in each part of the region, represent the maximum that we believe can be delivered, particularly over the early years of the Plan period. To raise delivery to this level will be a major challenge for planning authorities, for the house-building industry and for the communities which will have to absorb the growth. Taking account of what has already happened in 2001-2006, as shown by Table 7.2, our figure represents an annual rate of over 26,000 homes per annum from 2006 onwards. This is over 30% above recent levels of around 20,000 per annum – a "step change" in any language. It is also above the annual rate of household increase implied by all but the very latest projections.
- 2.12 So what of the "shortfall" still implied by the RSS provision? If the region can get ahead with the development provided for in this RSS, there is the possibility of considering even higher housing levels in the RSS review, starting from 2016 onwards. For this to be done in a sustainable way, however, as our recommendations make clear, a number of fundamental issues will need to be tackled. These include water resources, climate change, sustainable transport and a searching evaluation of spatial options, including the role of large new settlements. We also recommend (**R3.3**) that a broader strategic perspective, including the north–south issues, should form an input to that review.

- 2.13 The Spatial Strategy, which is the essence of RSS, is discussed in Chapter 4. We have endorsed EERA's general approach of concentrating development on urban areas, and sought to give it clearer expression. The region is clearly not a uniform whole in terms of growth. There are differences of approach between the East Anglian parts of the region and the more densely built up areas closer to London. The towns with the biggest housing increases by far are Norwich, Peterborough, Ipswich and the Cambridge Sub-Region, each growing by amounts between 20,000 and 33,000 homes, equivalent to the size of a new town. These towns have strategies for growth, generally sufficient land available and, at some distance from London, strong economic prospects. It is worth remembering that Norwich and Peterborough are both on more northerly latitudes than Birmingham, so the region may be seen to be doing what it can within its boundaries to steer growth further north.
- 2.14 Nevertheless this does not relieve the strong housing and economic pressures further south in the region and in those towns which have strong links with London. As major free standing towns Colchester and Chelmsford also provide for strong housing and economic growth. Maintaining the urban focus, closer to London the draft Plan included growth at the former New Towns of Harlow and Stevenage. We have endorsed these (but not the proposals at Harlow north and North Weald), and added Hemel Hempstead and Hatfield and Welwyn. Together with significant development at Basildon as part of the strategy for growth and regeneration in the Thames Gateway, this revival of the growth role of the region's ring of Mark 1 New Towns is, we believe, sound in terms of their ability to embrace growth in housing and employment and to do so more sustainably than elsewhere. The growth focus in the arc around London is completed by regeneration-led growth in the Thames Gateway at Thurrock.
- 2.15 Taken together with the region's contribution to the Milton Keynes and South Midlands Growth Area, these urban growth poles account for over half of the half a million homes the RSS will provide. The rest will be spread among the region's remaining larger towns indicated as "Key Centres", with attention also being paid to the needs of market towns, smaller settlements and rural areas. In keeping with the approach to RSS the local distribution in those places is left for local decision having regard to sustainable principles. One of those principles is the prudent use of land, and we support the RSS in maintaining the priority for the use of previously developed land. Nobody should be in any doubt, however, that the volume of development will require extensive use of "green field" sites as well. In some places, both as proposed in the draft Plan and as revised by us, this will mean strategic reviews of the Green Belt. We would emphasise that in these cases we believe it is possible for such reviews to find the required opportunities for development while maintaining the overall purposes and integrity of the Green Belt and establishing new boundaries which will be enduring, and at least as defensible as those they replace.
- 2.16 Development on a strategic scale, however sensitively planned, cannot be "massaged through" without changing anything. Where it occurs there will be major change to urban areas and their settings. Policies within the "ENV" section of the RSS, and being developed in more detail elsewhere, aim to ensure protection and enhancement of the character of valued places and features. Other policies are intended to ensure that where development occurs it makes a positive contribution to providing better urban living environments, to sustainability and to environmental gains where possible. The firm policy for Green Infrastructure which we propose is in our view of key importance in ensuring that rapid urban development goes hand in hand with strengthening the region's green assets. The spectre of "concreting over" the countryside is a gross exaggeration which has no place in serious debate. As anyone who knows the region or who explores it as we have done will be aware, the East of England has very extensive

- tracts of country, far and away the majority of its physical area, which is beautiful, productive and under no threat of urban development either now or in future. Keeping it that way is, despite the focus on growth and development, an important aim of the RSS.
- 2.17 Chapter 8 deals with the Regional Transport Strategy which embodies probably the greatest challenge for the region in achieving sustainable development. For more than a decade “reducing the need to travel” has figured hopefully in planning policies. In that time travel, especially car travel, in the region (and everywhere else) has grown inexorably and is forecast to continue. The freedom to get in a car and go anywhere at any time is, for many, an unquestioned part of their quality of life. We hardly need to add our voice to all those pointing out that things cannot go on like this. That freedom, like the freedom to use water, often taken for granted, is dearly bought and is under threat if it is not exercised more sparingly. The task for the RTS is to create the strategic framework for bringing this about in the East of England. (Incidentally, a similar approach will be needed, and appears to be emerging, in all regions to bring about more sustainable transport – one region cannot be expected to go it alone).
- 2.18 The draft Plan, as well as “reducing the need to travel”, has many of the right ingredients for improving public transport, opportunities for walking and cycling etc. We found, however, that there was considerable scope to improve its force and focus and our recommendations aim to do so. In order to be effective the RTS will need to be pursued with commitment and tenacity, and major financial resources, by DfT and the region’s local transport authorities. The latter may need to be given more scope to manage bus networks. Capital investment and revenue support for transport (along with other infrastructure to support development) is one of the key concerns for EERA and its members. The perception of an “infrastructure deficit” often comes down to a long standing wish for road schemes which may sit ill with keeping the lid on traffic growth. However, a large part of it is also to do with historic under-investment in the rail system and urban public transport, and the need to get to grips with making alternatives to car use truly viable. These areas assume even greater prominence in our revision of the RTS. The shift of emphasis away from road schemes may not go far in releasing the resources needed, as such schemes are often also required to improve bus networks.
- 2.19 As we discuss in the final Chapter, resources for infrastructure remain a concern for delivering the development the RSS proposes. We have looked for an alternative to EERA’s idea of trying to regulate the flow of development according to how investment materialises (or not). That approach was fraught with practical difficulties and would produce a “stop-go” climate which would be very unhelpful. Our alternative involves developing an implementation plan in partnership between Government and the region, retaining the strategic focus of RSS but setting out a much clearer perspective of key investment, and its expected implementation, over the plan period. This may be another thing that is not unique to the East of England, but in our view the quantity of development involved and the issues facing the region make this approach, or something similar, essential if the RSS is to be implemented along the principles of sustainable development.
- 2.20 The East of England Plan will be one of the first new Regional Spatial Strategies under the Planning and Compulsory Purchase Act, although it started life under the old arrangements. As such one of the areas of debate was the interface between the RSS and Local Development Documents without the intervening tier of Structure Plans. The draft Plan, perhaps subconsciously, reproduced a “structure plan” level of detail in many places, particularly the extensive sub-regional section. In places some participants, particularly developers, were looking for even more specific guidance on locating

development apparently feeling that local authorities would not come up with adequate proposals if left to themselves.

- 2.21 In our recommendations we have sought to draw the demarcation line between RSS and LDDs as high as possible. In other words we have left to LDDs everything that should reasonably be determined at the local level, and tried to focus the RSS on genuinely strategic matters on which decisions are needed from the regional level. Whilst we are keenly aware that delivery of development needs to be increased in many parts of the region, we do not consider that this would justify the RSS dictating detailed local decisions. What the RSS must do is to lay out the task for LDDs in unmistakable but strategic terms. We believe the approach we have taken is entirely in accord with the intentions of the legislation and the guidance in PPS11.
- 2.22 One consequence of our high demarcation line for RSS is much more sparing use of sub-regions. In many cases the draft Plan's sub-regional and sub-area policies carry forward policy from the previous Structure Plans which merely repeats what should be in the Spatial Strategy or generic policies, but adding local colour or detail which could more appropriately be left to the local level. Our recommendations greatly simplify and reduce the sub-regional content. We have, however, retained and sharpened the sub-regional guidance which is necessary to cover those situations where genuine sub-regional or cross-boundary issues need to be covered in order to avoid a "policy deficit". Whether the sub-regional housing market approach proposed in draft PPS3 will create a need for more comprehensive sub-regional coverage in future RSS remains to be seen. It will be important, however, not to obscure or encumber the high-level spatial vision with unnecessary layers of complexity which prevent its translation via LDDs into timely and practical action on the ground.
- 2.23 Another new factor was the need for Strategic Environmental Assessment. The SEA that was done was controversial, both in terms of the criticisms and issues it raised on the draft Plan and as to whether the procedural requirements had been complied with. We discuss the SEA issues in the next Chapter. Our perception is that the SEA fulfilled its purpose in identifying environmental issues and concerns raised by the draft Plan. As will be apparent throughout this report, issues raised in the SEA have informed the EiP discussion and our conclusions and recommendations for improving the Plan. On the procedural aspect, it is important to remember that the process will not be complete until the point at which the final RSS is ready for adoption. By that point, there will have been the SEA that was before us, the public discussion of issues and alternatives that we have conducted and further SEA work (as proposed by GO-E) and consultation at the Secretary of State's changes stage. On that basis we have no reason to doubt that the full purposes of the legislation will have been met.
- 2.24 A complication, to which environmental appraisal was also relevant, arose from proposals put forward by objectors as alternatives to those in the draft Plan. Some of them were well known locally and objection to them featured in many responses to the draft Plan, while others were relatively unknown. Of course none had been specifically covered by the SEA of the draft Plan. There was an expectation that these "omission" proposals would be considered by the EiP. However, the procedures for RSS do not provide an equivalent to the requirement in PPS12 paragraph C4 for publicity to be given, and for representation to be made, on proposals for alternative sites put forward in response to Local Development Documents. One suggestion was that we should emulate that requirement by allowing time for further representations, and for environmental appraisal, of alternative proposals.
- 2.25 Further consultation and independent appraisal work would have taken several months. We were reluctant to do this as it would not only have incurred delay but could also



have given a misleading impression of the degree of detail in which these alternatives would be considered. Many were site-specific options for meeting broader development needs, while some were essentially speculative. Instead (as explained in a note accompanying the issue of the final list of “matters” [Appendix B]) we identified the limited number of cases where these location-specific proposals fell within geographical areas where location specificity was an issue for the draft Plan. In those cases we invited the promoters to include in their written submissions a short “sustainability statement”. Such statements were to be related to the framework of objectives used in the SEA (and EERA was asked to do likewise in relation to the location specific proposals included in the draft Plan). In this way the aim was to create a level playing field between alternatives. Any “consultation deficit” in the case of alternatives put forward by participants would, if relevant, be addressed through consultation at the Secretary of State’s changes stage.

- 2.26 In so far as it became necessary the consideration of these options in the EiP was in our view effective, although the “sustainability statements” were not an unqualified success. While they served to present a lot of information in a concise way, it was apparent that the promoting participants had difficulty in taking an objective view of what was a positive, neutral or negative environmental effect. We mention all this here because it is an issue which may arise again for other RSSs. Adopting a more structured process for consultation and appraisal of proposals put forward in consultation responses and budgeting more time for this before the EiP may be one answer, although it would carry the danger of being drawn into too much unnecessary detail. We believe a better way lies in the process before consultation on the draft Plan. In Chapter 11 we argue that the RSS review should be based on a fuller appraisal of options. A thoroughgoing and genuine consultation on spatial options before a firm draft RSS is deposited should flush out the serious alternatives and greatly reduce the possibility of new ones first appearing at the deposit draft stage.
- 2.27 This has been a brief overview of some of the main issues which require comment. It does not cover all the conclusions and recommendations in our report, for which the reader is referred to the relevant Chapters. Whilst we believe we have addressed everything fairly and reached sound conclusions, we have no doubt they will not please everybody. People may feel vindicated by some parts and disappointed with others. So be it. One thing is vital. When the RSS is finally adopted (and regardless of whether all of our recommendations are eventually confirmed) everyone involved will need to get behind it and respond positively to the challenges it poses. In some areas this will require former adversaries to put disagreements behind them and work together to achieve what will have to become commonly-adopted new goals. But in plenty of other areas we have seen evidence of common willingness among many partners to tackle the new challenges enthusiastically.



## CHAPTER 3 - CONTEXT, SOUNDNESS, STRATEGIC ISSUES AND OBJECTIVES

### Background

- 3.1 In this chapter we consider the issues which set the context for our more detailed conclusions and recommendations in the subsequent parts of the report. We also draw conclusions about the Vision and Objectives for the RSS. The strategic context is set by the framework of national legislation and policy guidance set out in Planning Policy Statements (PPS) and elsewhere. That framework as such does not fall to be debated here, but it raised an agenda of issues and unanswered questions which did have to be addressed in the EiP and on which we need to make some judgements, even where these do not feed directly into proposals for changing the draft Plan.

### Procedural Context

- 3.2 The general policy and procedural context for Regional Spatial Strategies is set out in the Planning Policy Statement PPS11, which explains aspects of the requirements of the Planning and Compulsory Purchase Act and the relevant regulations. Preparation of the draft Plan began some time before these requirements came into force in 2004. The decision was made to “convert” the previous work on new Regional Planning Guidance (the “banked draft” RPG14, February 2004) to an RSS revision under the new legislation. Some participants expressed concerns about whether the procedural requirements had been complied with – for example with regard to community involvement. Hertfordshire CC suggested that the requirement of Section 5(5) of the Act for detailed proposals for sub-regional provisions to be made first by a Section 4(4) authority had not been complied with in relation to its area.
- 3.3 It is not for us to make a definitive ruling about whether the legislation has been complied with, but we have looked at this aspect of the soundness of the draft Plan in the light of the records of the work of EERA and its various committees and task groups including the Regional Planning Panel, and the programme of consultation reported in the Pre-Submission Consultation Statement (document EERA5). We conclude that in moving from the “banked draft” of the RPG review to the draft RSS EERA appears to have done as much as possible to adapt the draft Plan to the new requirements without losing the benefits of the earlier work by going back to the beginning.

### Sustainability Appraisal and Strategic Environmental Assessment

- 3.4 A specific procedural requirement is that of Strategic Environmental Assessment (SEA) required by European Directive 2001/42/EC, which Government advises should be incorporated in the Sustainability Appraisal (SA) of the strategy. Again, some participants questioned whether the draft Plan complies with the requirements, as a result of conversion at a relatively late stage from RPG into an RSS which would be subject to the specific SEA requirements as well as the need for a SA. These questions centred on the appraisal of alternatives and the requirement for an iterative process in which the SEA is supposed to inform the final content of the plan. With regard to alternatives, section 4 of the SEA report comments on the process that was undertaken. In effect many of the choices for the region are already made by the strategic context. The consultants make it clear (EERA3 page 57) that some of these result from national policies that they disagree with but as these matters are outside the scope of the SEA there is no discussion of the implications of trying to change national policy to be less challenging to the environment of the East of England.

- 3.5 Within the proper scope of the RSS, the main strategic assessment of options was at the Options Consultation Document stage. These were broad spatial approaches rather than complete alternative strategies, and thereafter EERA proceeded on the basis of synthesising a single strategy in the light of the result of considering those options. At this point an “optioneering approach” appears to have given way to more ad hoc decision making about various elements of the draft Plan, informed by various studies and other information coming forward. As the consultants note, sustainability issues figured prominently in many of the decisions and so are indirectly reflected in the implicit spatial pattern. In our view the “audit trail” of decision making through the EERA Regional Planning Panel and other groups, and the evidence base on which decisions were made, are clear enough. Most of the concerns expressed, for example by Hertfordshire CC and others, really go back to disagreement with the amounts of, and locations for, development that EERA decided to put in the draft Plan. On those, and alternatives to them, there is, in addition to the issues identified by the SEA report, a wealth of information and argument which came before the EiP as a basis for testing the draft Plan. To that extent the EiP and the choices that result from it represent in part a further consideration of options, although not in the form of complete alternative strategies.
- 3.6 The SA/SEA report (document EERA3) details the approach adopted and the stages gone through in preparing the SA/SEA. The consultants themselves refer to certain shortcomings in what could be achieved in the short time available for the process. They also explain the steps taken in scoping the SEA, collecting data, identifying and analysing issues and in interaction with the preparation of the draft Plan. It appears that as soon as they were appointed to do the SEA the consultants set about making the appropriate consultations on scoping, as well as seeking to take on board the SA work that had already been done. It is also apparent that close links were maintained through the relevant EERA Task Groups between the SA and SEA work and drafting the Plan. Appendix D of the SEA report shows an iterative and interactive process from the Options Consultation in September 2002 onwards. The consultants state (document EERA3, page 2) that the report meets the requirements of the Directive and the Act, and also (page 11) that the level of detail given is in line with the Directive. We find no reason to take a different view, having considered the relevant background documentation.
- 3.7 With regard to the shortcomings identified by the consultants, we appreciate that it may not have been possible to achieve the ideal level of baseline material to inform the judgements made in the SEA. The judgements made in the report itself are not always clearly explained. They are often not hard and fast but in the form of comments about risks that may or may not arise from a proposal depending on how it is implemented, although this often leads to suggestions about how to improve the Plan. The appraisal is arguably more satisfactory as a SEA than as a wider Sustainability Appraisal since its focus is overwhelmingly environmental. Assessment of the draft Plan’s performance on the social and economic components of sustainability is very thin, as indicated by those few parts of the SA/SEA document that are highlighted in grey as not being part of the Environmental Report. Most of the SEA’s challenges to the draft Plan, and suggestions for improving it, are from an environmental perspective.
- 3.8 Despite the problems, which are ones that would confront any team attempting to carry out a SEA of a very wide ranging plan over an intense period, the appraisal does seek to cover all the necessary ground and is a considerable improvement on the “tick box” approach of many previous examples. It comments on the substance of the draft Plan and the risks to achieving its good intentions, and not merely on whether it uses the right words. We find the SA/SEA to have been very helpful in exposing issues that

need further consideration. The SEA findings had an important influence on the framing of the matters for the EiP, and featured in the discussion. We also make reference to points from the SEA in various parts of this report, and many of our recommendations are intended to improve the Plan in relation to matters identified by the SEA. Those who argued that the process was flawed because of weaknesses in the draft Plan identified by the SEA miss the point that submission of the draft Plan was one stage in a process, to which SEA has further contributions to make. Those drawing on the views of the consultants also did not always seem to recognise that their report represents the expression of one viewpoint (albeit an informed and independent one) and should not necessarily be taken as decisive. The key test will be whether, when the RSS is finally adopted by the Secretary of State, it addresses adequately those issues thrown up by the SEA process.

- 3.9 The Government Office (GO-E) indicated that further SA/SEA work would be undertaken if necessary following the delivery of our report, and the results published at the Secretary of State’s proposed changes stage. We consider that this is a necessary addition to the work already done and would help to ensure that the SEA requirements will have been fully complied with by the time the RSS is adopted. Further SEA should follow an approach to scoping and the identification of issues compatible with that of the previous SEA work, and should consider in particular whether the changes (assuming they follow our recommendations) adequately address the issues raised by the SA/SEA report (EERA3). We recommend **R3.1** that further SEA work is undertaken on the proposed changes and the results published at the same time as consultation on the proposed changes.
- 3.10 During the EiP it emerged that there is a separate requirement for an “appropriate assessment” to be done where a plan, such as the RSS, is likely to have a significant effect on a designated European site. This was not a matter that the EiP was able to consider, and we have not assessed which policies and proposals in the draft Plan, or in our recommendations for changing it, may trigger a need for “appropriate assessment” in relation to designated sites within the region. The chief examples where this may be the case are specific road schemes which traverse designated sites. Our recommended revised approach to the RTS (Chapter 8, **R8.1**), seeking a strategic “outcome driven” approach rather than one which ties the strategy to specific proposals may help to avoid conflict with conservation objectives. It is not for us, however, to say whether “appropriate assessment” would necessitate any further amendment to the draft Plan. We understand that GO-E and EERA, in consultation with the relevant statutory agencies, are considering what additional assessment will be needed to satisfy the requirements which will apply under new Regulations being made as this report is being written. Clearly it is important that this is done, and for completeness it is referred to in our recommendation.
- 3.11 As indicated above, we find that the SEA requirements, essential as they are, have more or less taken over Sustainability Appraisal. As a result, whilst there is a purposeful and thorough appraisal of environmental aspects there is no similarly focussed assessment of the Plan’s strengths and weaknesses and likely impact in economic or social terms. This is despite the extensive evidence base on those aspects. We do not suggest that there should be any attempt to “balance out” the environmental content of an SEA with other objectives. However it would be helpful in future to consider, alongside the SEA report, conducting an “holistic appraisal” in which a similarly methodical approach is taken to assessing the Plan against objectives and baseline knowledge in key non-environmental matters. An appraisal of this kind would certainly be more in keeping with the integrated approach towards the five guiding principles of Securing the Future: the UK Sustainable Development Strategy. It would also greatly help in agenda setting

for EiPs and in getting participants who may be strongly driven by one agenda to address themselves to the issues raised by others. We recommend **R3.2** that this is considered.

### Soundness of the RSS

- 3.12 Sustainability Appraisal is one of the criteria for assessing soundness of RSS set out in paragraph 2.49 of PPS11. Those twelve tests are similar but not identical to those for LDDs set out in paragraph 4.24 of PPS12. In particular there is no direct equivalent of test (vii) for LDDs, about whether the strategies/policies/allocations represent the most appropriate in all the circumstances. Yet that, in essence, is what most of the argument at the EiP is about. A plan could be “sound” in terms of the tests in PPS11 and yet fail to make the best or most appropriate policy choices. In this sense we regard the tests set out as rather like a vehicle MoT test – they signify that certain criteria are satisfied but are no guarantee of quality, reliability or enduring roadworthiness. We did not therefore attempt to structure the EiP around “tests of soundness” but around the substantive issues raised by the Plan itself, the SEA and the evidence base, and the response to consultation. We do not believe participants were expecting anything else, nor would they have been content with an EiP which was a mechanical check against the criteria in PPS11, which could just as well be a desk exercise. Nor do we believe this is what the Secretary of State has in mind but it may be helpful, if a suitable opportunity arises, to correct any mistaken impression that may be given by paragraphs 2.48 and 2.49 of PPS11. It should be made clear that the primary purpose of an EiP is to provide for public debate of the substantive issues raised by the draft Plan and responses to it and lead to recommendations to the Secretary of State for resolving them.
- 3.13 In preparing and conducting the EiP on those lines the points covered by the criteria listed in paragraph 2.49 of PPS11 have naturally been explored. While it is relevant to consider whether the draft Plan as submitted was “sound” in terms of the PPS11 criteria, it is much more important that the RSS is sound in the form that we recommend it for change following the EiP, and in particular whether any unsound aspects of the submitted draft have been rectified. In order to appreciate how the draft Plan has been tested it is of course necessary to consider all of our recommendations and the reasons for them. It may, however, be helpful if we provide here some brief comments on how the RSS, as we propose it should be changed, satisfies each of the criteria for soundness identified in PPS11. These are set out below:
- (i) *“whether it is a spatial plan, including in particular, does it properly take into account related policy initiatives and programmes relevant to meeting regional economic, environmental and social needs, where these directly impact on the development and use of land, and does it contain policies which sufficiently link with those related policy initiatives and programmes to deliver the desired spatial change.”*

In general terms this test is complied with. However, it must be said that it is very often difficult to pin down the regional spatial planning implications of “related policy initiatives and programmes relevant to meeting regional economic, environmental and social needs where these directly impact on the development and use of land”. We found that many participants made their contributions at the scale of high-level strategy in relation to their own operational plans, in which case it is difficult to pick out specific spatially-related concerns that can contribute meaningfully to the RSS other than the most general “motherhood and apple pie” statements which probably have national rather than specifically regional applicability. Even for the RES, for which the RSS is supposed to provide the spatial framework, EEDA seemed unable to provide much spatially specific input

to the EiP. Alternatively (and since many participants from “non planning” sectors operate on a fairly local, rather than region-wide basis) contributions were couched at a level of often site-specific detail more appropriate to an LDD rather than an RSS. In our view it would be helpful for more advice and guidance to be available to RPBs and others to indicate, by way of practical examples, what it would take for this test to be complied with.

- (ii) *“whether it meets the objectives for a RSS, as set out in paragraph 1.7 of this PPS”.*

In our view this test will be complied with if the RSS is changed in accordance with our recommendations. Looking briefly at the component elements of this test (PPS11, paragraph 1.7):-

- it would articulate a spatial vision contributing to more sustainable development;
- it would now be concise and user-friendly;
- it would address cross-boundary issues, but now limited to those where the most potentially difficult regionally-important decisions and delivery issues have to be faced, and it would now exclude local issues which are more appropriate for LDDs;
- it would now be reasonably consistent with other regional frameworks and strategies that were drawn to our attention;
- it would be region-specific, except in a few exceptional instances where we have felt it appropriate, for reasons which we have explained, to re-iterate less familiar and/or accessible national policy (eg in the case of our recommended overarching policy SS1);
- it would not be site-specific, and would only be locationally specific where this does not usurp the proper function of LDDs;
- it would identify the need for delivery mechanisms to be established in certain important areas, without being prescriptive;
- it would provide the grounds for the objectives of this test to be met;
- it will add value to the planning process; and
- it will contribute towards achieving more sustainable development.

- (iii) *“whether it is consistent with national planning policy and if not whether the case has been adequately made for departing from national policy”.*

We find that the draft Plan would be consistent with national policy if changed in accordance with our recommendations, although there are matters affecting the East of England where the RSS has to go further in particularising national policy.

- (iv) *“whether it is consistent with other relevant regional strategies for the region, including the regional housing, economic and cultural strategies and with RSSs for neighbouring regions where cross boundary issues are relevant. Any major inconsistencies will need to be justified”.*

We find the draft Plan consistent with other relevant regional strategies.

- (v) *“whether the policies in it are consistent with one another”*

In our view the policies would be consistent if the draft Plan is changed in accordance with our recommendations.

- (vi) *“whether it is founded on a robust and credible evidence base”.*

In our view the evidence base for the draft Plan (as recommended for change) meets this test in general terms, and within the limitations of the available data.

- (vii) *“whether community involvement and partnership working have been satisfactory, including whether the RPB has taken proper account of the views expressed”*.

A significant number of those commenting on the draft Plan or participating in the EiP were not content that this test had been met, especially in relation to matters introduced at a late stage before submission. We understand views expressed about a “consultation deficit”. However, as far as we have been able to ascertain, the statutory requirements and the requirements of this test were met as far as possible within the time and resource constraints placed upon EERA. Our recommendations for change will assist in this regard through deleting excessive locational specificity and remitting more of these matters for local determination through LDDs.

- (viii) *“whether it is realistic, including about the availability of resources, and is able to be implemented without compromising its objectives”*.

There was much controversy about the extent to which this test was met, resulting in EERA’s suspension of their endorsement of the draft Plan and many representations about an existing infrastructure deficit which would be exacerbated by the level of development proposed. We have discussed this issue elsewhere in the report (see Chapter 11). There is certainly an uncomfortable relationship between the short-term process of public spending reviews and the long-term commitment needed to plan successfully for large-scale sustainable regional development including the necessary step-changes in public transport accessibility and affordable housing. The kind of copper-bottomed guarantees sought by some participants are clearly impossible to give and the various forms of contingency arrangements discussed at the EiP probably have only limited applicability in practice. We have recommended some changes to the RSS in terms of the delivery policies and consider that this test would broadly be met but, ultimately, only time will tell.

- (ix) *“whether it is robust and able to deal with changing circumstances”*.

We consider this test generally met.

- (x) *“whether it has been subject to a satisfactory SA and whether alternative options were correctly ruled out taking account of the SA findings”*.

This test is covered by our discussion of the SA/ SEA in paragraphs 3.4 to 3.11 above.

- (xi) *“whether in all other respects it has been prepared following the proper procedures, as set out in the Act, Regulations, this PPS and related guidance”*.

As far as we are aware the requirements of the Act and Regulations have been met during the process to date. Our recommendations would bring the RSS into line with PPS11 and related guidance.

- (xii) *“whether it has clear mechanisms for monitoring and implementation”*.

We consider that this test is met if our recommendations are acted upon.

## Strategic Context

3.14 A major part of the context for the RSS, and of the agenda for the EiP, flows from two key streams of policy from the national Government level:

- The Sustainable Communities Plan (SCP):
  - Housing needs and the Barker review, culminating in draft PPS3
  - The Growth Areas
  - Drive for a step change in housing output



- The UK Government Sustainable Development Strategy (SDS) “Securing the Future”
  - An integrated approach to sustainable development
  - Environmental limits
  - The climate change imperative

Common to both these is the central tenet of sustainable development and an emphasis on good governance and community involvement. Also common is the fact whilst both are derived from earlier policy their latest expression came in 2005, long after the draft Plan was submitted. “Sustainable Communities Homes for All”, described as a Five Year Plan (and containing at Appendix 1 a definition of a sustainable community) came out in January 2005, “Securing the Future” in March 2005, while the PPS3/Barker package appeared at the mid-point of the EiP in December. Despite the common elements, there is a very marked difference of emphasis between the thrust for growth in the SCP and the emphasis on climate change and environmental limits in the SDS. Reconciling these two things has been central to the discussion at the EiP and our task in the report.

- 3.15 This context not only encapsulates the strategic issues for the region as a whole, but is also reflected in the sub-regional and local agendas raised by the draft Plan. These are considered in more depth in the subsequent chapters of this report. For the present, however, we comment only on two broad issues of providing for growth and how to do sustainable development through a RSS.
- 3.16 One of the most quoted conclusions of the SA/SEA report is that “...the rate and intensity of economic and housing development which the region faces is intrinsically damaging to the environment...” (EERA3 page 63). This is allied to the broad generalisation that “the ‘banked RSS’ level of development proposed is significantly worse for the environment than the ‘business as usual’ option (ie continuation of RPG6/RPG9 policies) and the ‘Rooker’ level of development (taken to be a further 18,000 dwellings) is worse still.” (EERA3 page 58). It is important not to put too trite an interpretation on these statements. At one level they are saying no more than that any development is damaging and that the less of it there is the better. This would strike a chord with many respondents who would rather not have development near them, or anywhere for that matter. As a way of deciding what the region should provide, this simply does not meet the case - one region cannot just opt out of growth. Nor is it correct in our view to regard the environmental concerns as somehow intrinsic to the region and the requirement for growth as something imposed from outside the region’s control. It would be equally valid to argue that the drivers for growth are deep seated within the region, while issues such as climate change are outside its control. One could also set against the SEA comment a similar broad generalisation that “the ‘banked’ RSS level of development is significantly better for social progress and economic well-being than the ‘business as usual’ option and the ‘Rooker’ level of development is better still.”
- 3.17 What is needed is to take on board the growth agenda as well as that of environmental limits and climate change and produce a strategy which addresses both. This, we acknowledge, is what EERA have sought to do in the draft Plan. Returning to the SEA comment about the rate and intensity of development, seen in its full context it is saying that this is a challenge underlying the RSS, not that it is unacceptable or that the challenge cannot be met, or that there is a set environmental limit to development at the regional scale. This challenge appears under the heading “weaknesses” of the core spatial strategy. It is the only weakness listed there and is perhaps more accurately regarded as a threat to the success of the Plan as a strategy for sustainable development.

In fact many of the conclusions and suggestions from the SEA are designed to help strengthen the Plan in overcoming the challenge and make more effective those aspects of the Plan intended to safeguard environmental features and increase sustainability.

- 3.18 We have taken forward the lessons of the SEA, and many of the issues raised through the EiP in our recommendations for improving the RSS, as well as proposing an increased level of development. That level of development is not a result of imposing a “top down” answer but has been built up from our sub-regional testing of the draft Plan, against identifiable environmental constraints and also against the background of the overall upward pressure of housing needs and demographic expectations. Our aim has been to ensure a strategy for true “Sustainable Communities”. It is important to recognise that “business as usual” would not result in sustainable development. “Business as usual”, besides producing insufficient housing to meet growing needs, means continuing growth in road traffic, falling public transport use, rising energy consumption, growing water use and depleting supplies, and unsustainable waste management. All these things must be changed. The RSS, with the amendments we recommend, sets out to support and bring about those changes. In doing so, it should increase the “headroom” for accommodating development. We believe it is not so much the quantum of growth but the way it is done which provides the challenge, and the opportunity for moving in the direction of more sustainable development.
- 3.19 We have said above that one region cannot “opt out of growth”. While we have sought to respond to the growth agenda, it will be apparent that our proposals, particularly for additional housing up to 2021 do not go far enough to meet the whole of the latest projected household increase in the region, let alone provision over and above that to address the housing market issues in the light of the Barker review. They will, however, represent a major increase in housing delivery over current levels and very challenging employment growth. As we conclude at paragraph 7.20, simply adding even higher numbers to the regional housing provision would not increase delivery further in the short to medium term. In fact it could prove counter productive as LDDs would have to wrestle with additional requirements instead of getting on with what is deliverable. Our approach to dealing with this is to call for the review of the RSS to address the possibilities for additional growth, including spatial options for major new settlements. This will also be particularly relevant to growth beyond 2021.
- 3.20 Many, besides the SEA consultants, have struggled with the difficulty of forming a view on the right level of development for one region in isolation. There is a common perception that in the Midlands and the North growth is wanted more and would be more easily absorbed. Whilst we conclude in paragraph 7.17 that this cannot absolve the East of England from dealing with its own growth requirements, it remains the case that there are major inter-regional issues that cannot satisfactorily be addressed separately by each region in turn, as is happening with the current round of RSS. These are not just about balancing housing growth, jobs and environmental interests, but also raise serious issues about infrastructure and resources.
- 3.21 For water resources, for example, while the approach we recommend and the Environment Agency’s plans should deal with the issues for this RSS, additional growth at higher levels beyond 2016 or 2021 is likely to necessitate additional sources of water supply. As we understand it there is no reason to expect increasing rainfall in the East of England. Water supply to the region will depend on new water resource infrastructure, with not only high investment costs but also strategically significant developments, and their associated environmental impacts, in other regions. A question that will arise, indeed many are asking it now, is how far it will remain sensible in future to move increasing amounts of water into the driest region to support more growth, or whether it is practicable or sustainable to steer more growth to places where

water supply is not a problem. For transport and other key infrastructure, new settlements or other major growth additions will give rise to further strategic investments, which are likely to entail major calls on public expenditure. The East of England will of course be in competition with other regions for the necessary resources. A key choice for Government will therefore be whether the return on investing in new communities in the East of England is better than investing somewhere cheaper. It is self evident that these matters cannot be decided within a strategy for one region.

- 3.22 It would be helpful therefore if, before the next round of RSS for this and other regions, there was some broader national stocktaking of regional development, resources (in the widest sense) and prospects. We are aware that there are various streams of work on regional disparities, communities, housing and environmental issues and other matters. The next public spending review and emerging prospects for strategic infrastructure investment will be relevant. From the regional level the current round of RSS will set out spatial priorities. What is needed in our view is to bring some of this together to identify areas of convergence, differences and tensions between regions. To be effective this should be more broadly based than a departmental or inter-departmental review within Government. The Regional Assemblies might be usefully involved, but we would also see benefit in including independent expertise as well as some key stakeholders in spatial planning and regional development.
- 3.23 We are not necessarily advocating a national spatial development strategy, although if there was one it would help to provide a coherent framework for regional decisions. Nor are we arguing for a pre-determined regional apportionment of growth (although that is what many participants believed had been attempted through the Government's dialogue with EERA over the LSCP Growth Area). The emphasis should be on putting together a coherent cross-regional picture from current information, perceptions and policy stances, and the issues raised by the current RSSs. This need not be an elaborate research based exercise, but should take the form of synthesis and discussion using the available evidence base. An inter-regional review would help the regions to share a consistent set of parameters and some clear understanding about inter-regional and particularly north-south issues. RSS reviews would be able to take account of any national debate or Government response to such a review. The kind of difficulty we have had in being able to say whether the Plan is sound in terms of realism about resources (see item viii in paragraph 3.13 above) might also be alleviated. It would also give Government a consistent perspective against which to consider future RSS. This approach is reflected in our recommendation **R 3.3**.
- 3.24 For the present, however, the draft Plan has to be judged against the existing strategic background, such as it is. In the light of the discussion above we consider it important that the RSS engages fully with both the growth agenda and the principles of sustainable development. While it seeks to do this in a general way, we find that there is scope for this to be reflected more fully in the vision and objectives within which the policies are set.

### **Vision and Objectives**

- 3.25 The vision contained in paragraph 3.2 of the draft Plan mentions many of the components of sustainable development, but is a rather watery reflection of what a spatial strategy is aiming to achieve. As indicated by the draft Plan's 14 objectives, the aims of the Plan cover a broad spectrum of themes, and these need to be condensed into a similarly broad, but focussed statement of the vision. We do not believe the themes are controversial – there is very broad support for them all although the EiP brought out sharp differences of view about what was needed to pursue them, and the relative emphasis among them. The main themes are:

- Making the most of the region’s economic potential
- Reducing the region’s environmental impact and resource use
- Increasing housing opportunities and social cohesion in the region’s communities
- Improving the quality of life and strengthening the region’s environmental assets

These themes translate easily into quite a long list of desired outcomes, which are reflected in the objectives. To express the overall vision for the region, however, a concise statement on the lines of draft Plan paragraph 3.2 is needed, an amended version of which we recommend at **R3.4**.

3.26 The objectives set out in draft Plan paragraph 3.3 seek to give high-level expression to a long list of outcomes sought by the wide range of policies in the Plan. The list is unstructured, as is emphasised by the fact that they are stated to be in “no particular order”. We appreciate that the reason for this is to avoid giving the impression that some objectives are more important than others. However, many participants found the result to be unclear and lacking in focus. Other criticisms highlight the fact that the objectives are not firmly enough targeted towards outcomes but are couched in tactical terms. For example Objective 8 is about meeting the region’s identified housing needs but does not refer to the “step change” in housing delivery that is needed to address this. Objective 12 talks of “encouraging the use of more environmentally friendly modes of transport”, but does not target the major shift in travel behaviour that is needed. And there is no explicit objective about climate change, although some of them may be seen as addressing it.

3.27 The various suggestions made would involve adding to the points listed in draft Plan paragraph 3.3, while all the points already there may be thought too important to be dropped. Merely lengthening the present un-ordered list would not, in our view, help to provide the more focussed strategic objectives that are required. Instead we suggest the list should be reduced to five over-arching or primary objectives, each one amplified by a short list of contributory objectives as bullet points. The substance of the objectives in our proposed list is self-explanatory. It has been drawn from the submissions put forward, from the issues raised, and from our main conclusions throughout this report about the shape that the RSS should take. The result is included in our recommendation **R3.5**.

## RECOMMENDATIONS:

### **R3.1**

Additional Strategic Environmental Assessment work should be commissioned to assess the RSS in the form in which it is proposed to be changed by the Secretary of State on consideration of our recommendations. Further SEA should follow an approach to scoping and the identification of issues compatible with that of the previous SEA work, and should consider in particular whether the changes (assuming they follow our recommendations) adequately address the issues raised by the SA/SEA report EERA3. The results should form a new SA/SEA report published at the same time as consultation on the proposed changes. Either as part of that report or separately, the Department should also publish the results of any “appropriate assessment” carried out on the RSS in relation to protected European sites under the Habitats Directive.

### **R3.2**

Consideration should be given, if not on this occasion then for future reviews, to conducting an “holistic appraisal” of the Plan’s economic performance and fulfilment of requirements relating to social needs, good governance and the application of sound science, as well as environmental sustainability.

**R3.3**

After the RSS has been finalised, consideration should be given to conducting a broad inter-regional review to help establish a coherent inter-regional perspective and evidence base for future RSS reviews. Details are for further consideration but account should be taken of the suggestions in paragraphs 3.22 and 3.23 above.

**R3.4**

In place of paragraph 3.2 of the draft Plan the RSS should include the following overall spatial vision:

“By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people by meeting their housing needs in sustainable and inclusive communities. At the same time it will reduce its impact on climate change and the environment through savings in energy and water use and by strengthening its stock of environmental assets.”

**R3.5**

Replace the objectives listed in paragraph 3.3 of the draft Plan with the following set of RSS objectives:

Objective 1: To reduce the region’s impact on and exposure to the effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel towards public transport, walking and cycling and away from car use;
- maximising the energy efficiency of development and promoting renewable energy generation; and
- minimising the risk of flooding.

Objective 2: To increase housing opportunities for people in the region by:

- securing a step change in the delivery of additional housing throughout the region, and especially in the Growth Areas; and
- recognising a priority for the provision of affordable housing to meet identified needs, particularly in rural areas.

Objective 3: To realise the economic potential of the region and its people by:

- facilitating the development needed to support the region’s business sectors and clusters and improvement of skills and the widening of opportunities in line with the Regional Economic Strategy;
- providing for job growth broadly to match increases in housing and to improve the alignment between workplaces and homes;
- maintaining and strengthening the region’s inter-regional connections particularly by improving connections to economic opportunities in London; and
- ensuring adequate and sustainable provision of transport infrastructure.

Objective 4: To improve the quality of life for the region’s people by:

- ensuring new development fulfils the principles of sustainable communities, providing a well designed living environment adequately supported by social and green infrastructure;

- promoting social cohesion by improving access to work, services and other facilities especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the region;
- regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the implementation of the strategy at the local level.

Objective 5: To improve and conserve the region's environment by:

- ensuring the protection and enhancement of the region's environmental assets, including the built and historic environment, landscape and water;
- re-using previously developed land and seeking environmental as well as development gains from the use of previously undeveloped land;
- protecting and where appropriate enhancing biodiversity through the protection of habitats and species, and new habitat creation through development;
- provision of a network of multi-function greenspace accessible to the region's people; and
- minimising the demand for and use of water and other natural resources and reducing waste and increasing sustainable management of waste.

## CHAPTER 4 - SPATIAL STRATEGY

### Introduction

- 4.1 At the root of many criticisms of the spatial strategy is a lack of clarity and thrust caused by including too many policies developed in too much detail. We consider it more effective to set out a more concise higher-level strategic spatial strategy establishing some of the more important landmark generic policies, including those identifying what makes for sustainable communities. Most of the more detailed matters would then be developed in the various thematic chapters of the plan focusing on aspects of the economy, housing, transport, the environment and culture. Policy relating to particular sub-regions or key centres can then be further developed within a separate chapter coming after the thematic chapters and before the final chapter on implementation.
- 4.2 There were many occasions during the EiP when it became apparent that participants did not understand the relationship between present Chapter 5 and the region-wide policies in the succeeding chapters. In our view the above arrangement should overcome that by making it clearer that the content of all of the preceding chapters applies within all the sub-regions and key centres except where stated otherwise. This should make the plan more user-friendly and reduce the sometimes confusing tendency for issues to be covered more times than necessary.

### The need for an overarching policy on climate change and sustainability

- 4.3 Before discussing this reordering in any detail we refer to the draft Plan's treatment of climate change issues, particularly the UK's commitments to reduce carbon dioxide emissions by 20% by 2010 and 60% by 2050. This was a major area of challenge to the draft plan, raised by many participants. Although these issues are referred to in Chapter 9 of the draft Plan on "environmental resources" (paragraphs 9.30 to 9.31), many consider that they require more centrality within the Plan through inclusion of an overarching spatial strategy policy together with stronger standards and reduction targets in a number of areas such as traffic, CO<sub>2</sub> emissions, energy consumption etc. Some urge the adoption of a more demanding national or regional reduction target than 60% by 2050.
- 4.4 As a further development of this theme, such participants tend to feel that the draft Plan regards the environment as a negative constraint rather than having equal status with other objectives. In their view the new national policy set out in "Securing the Future" has decisively shifted the earlier approach of balancing social, environmental and economic aims towards a more holistic one of "integrating" the new five guiding principles - "living within environmental limits (and ensuring that 'natural resources needed for life are unimpaired and remain so for future generations') ensuring a strong, healthy and just society, achieving a sustainable economy, promoting good governance, and using sound science responsibly".
- 4.5 Some participants would prefer the draft plan to go much further towards including clear statements about regional "environmental limits" and what this would mean in terms of setting finite parameters for housing and employment growth, transport, energy (and other resource) consumption and so on. While this may be an attractive concept the draft plan does not make definitive statements about such matters. The SA/SEA, while registering concerns about the level of growth proposed and its potential environmental impact, and suggesting strengthening of some policies to address these, did not offer a way of defining limits to growth. At this stage we find there is no way to

provide unequivocal answers to questions of regional environmental “capacity”, although we were told that DEFRA has commissioned research to try to provide more tools for addressing this issue. There are some obvious difficulties in isolating the precise carbon effects of RSS policies. For one thing, they have the potential to be implemented in a great variety of ways at the level of LDDs and individual schemes. For another, there is inevitably constant movement of the contextual goalposts: a planning commitment made early in the planning period of an RSS may be implemented years later in a very different regulatory and financial background, possibly resulting in great change in its eventual carbon footprint.

- 4.6 An appropriate degree of realism and honesty is also required about what the RSS can and cannot contribute to the cause of combating climate change. It can provide a challenging set of policies which, if properly addressed and acted upon by the many implementing agencies, has the power to make a significant positive contribution. Equally there is a risk that they may produce negative outcomes if not acted on fully, a point highlighted by the SEA report. It must also be remembered that the RSS spatial planning policies are but one element of a much wider decision-making web affecting progress across a single English region.
- 4.7 Nonetheless, we agree that the issues of climate change and living within environmental limits should assume a more central place within the RSS. While the draft Plan can be said to address them in an implicit way there was fairly widespread acceptance that it would be useful to recognise them more explicitly in an overarching SS policy. This should give a clear picture to the need for planning in the East of England to:
- (a) recognise and work with, rather than against, change already recognised as inevitable or, on the precautionary principle, highly likely;
  - (b) aim to assist the creation of more sustainable development, across areas of policy deliverable through the RSS;
  - (c) seek to achieve environmental gains (or at least avoid harm); and
  - (d) mitigate or compensate for harm wherever this results from an explicit and transparent trade-off made as part of an “integrated” judgement.

In our view it would be helpful to the LDD process to set out a clear tiered approach of this kind, requiring environmental impacts to be clearly identified and assessed in that context.

- 4.8 Alongside climate change, participants inevitably made many references to the concept of sustainability, in particular what is meant by “sustainable development” and “sustainable communities”. This was often in the context of “strengthening” individual policies in order to make them better able to require/enable these objectives to be fulfilled. In our view this is another topic which could be given the greater emphasis which it merits within an opening overarching policy of the Plan.
- 4.9 During the EiP our attention was drawn to the definition of a sustainable community set out in Appendix 1 to the ODPM publication “Sustainable Communities: Homes for All” (EXAM48). Assuming that this definition is intended to be an enduring statement on this important topic this is not a very prominent place in which to find it. Therefore, despite our usual approach that the RSS should not repeat Government policy, we consider that it would be helpful to include reference to it in the overarching policy, making it clear that the RSS will be seeking to further the spatial components of “sustainable communities”, most of which contribute heavily to “sustainable development”. Further to the discussion at paragraphs 4.4 to 4.7 above, we also recommend that the new policy should include direct reference to the five guiding



principles of sustainable development taken from the UK Strategy, since this would effectively mainstream this approach into planning policy rather than relying on the outdated, indirect, and arguably less comprehensive and challenging commentary upon it in PPS1 (paragraphs 4 to 5).

- 4.10 Our recommendation **R4.1** therefore provides a new overarching policy SS1 (achieving sustainable development) along the above lines.

### **Restructuring the other SS policies**

- 4.11 Following the new overarching policy we are recommending three further new policies which incorporate what we see as the essential elements of policies SS1, SS2, SS4 and SS9 in the draft Plan. The new policies, discussed in more detail in paragraphs 4.13-4.20 below, would be SS2 (the Overall Spatial Strategy), SS3 (Key Regional Centres for Development and Change) and SS4 (Development in other towns and rural areas). We also recommend deleting the following as separate policies in the spatial strategy and dealing with their subject matter as described beneath.

- SS6 (the transport strategy): We subsume the essential elements of this within our recommendations on Chapter 8 on the ‘Regional Transport Strategy’.
- SS10 (the regional economy): We cover the relevant subject matter of this policy in our recommendations in Chapter 6 dealing with ‘Economic Development, Retail and Tourism’.
- SS12 (health, education, and social inclusion): We heard useful contributions pertaining to these matters from the public health group representatives, from representatives of the voluntary sector and from some participants from the education field. In our view the subject matter of this policy is important enough to be given more prominence as an essential element of overarching Policy SS1 and Policy SS2, as explained further below.
- SS13 (overall housing provision): We include the necessary content of this policy in our recommendations on Chapter 7 on ‘Housing’.
- SS14 (development and flood risk): In our view a slightly amended version of this policy is better placed within Chapter 9 on ‘Environment, Water, Renewable Energy’ and we recommend accordingly.
- SS16 (quality in the built environment): We also take the view that this issue is best placed within the Environment Chapter.

Our recommendations **R4.2** to **R4.4** reflect this suggested re-ordering, while at **R4.10** to **R4.12** we cover the relocation of the subject matter of the six SS policies mentioned above.

### **A spatial strategy for growth**

- 4.12 We have commented in the previous chapter on the need for the RSS to take on board the growth agenda alongside that of environmental limits and climate change. One ingredient of the spatial strategy is the fact that the region has a share in three of the Government’s Growth Areas. The Thames Gateway is a long established regeneration and growth initiative which finds reflection in the draft Plan and the separate sub-regional strategy for the Milton Keynes and South Midlands Growth Area is now adopted. The London-Stansted-Cambridge-Peterborough Growth Area (LSCP) has a shorter history and the draft Plan is in effect the first attempt at a strategy for it. As such, how the Plan deals with it has been a pivotal issue (although not the only one) for the spatial strategy.

- 4.13 In common with many other commentators, we take the view that the LSCP Growth Area has little coherence in functional geographical or economic terms. The area has been identified in administrative terms as a large swathe of whole districts in the western part of the region. This may be useful for considering issues to do with support and funding for growth initiatives. We consider it may have been unhelpful, however, in focusing the search for growth options on one group of districts. Understandably, within the draft Plan the Growth Area is not treated as an entity but falls into a number of separate sub-regions or areas: Peterborough Sub-Region, Cambridge Sub-Region, Stevenage Sub-Area and Stansted/M11 Sub-Region. The LSCP Growth Area concept is further diluted by the fact that many locations outside the area have growth aspirations or potential, some of which have the possibility of being recognised for Growth Areas funding as “New Growth Points”.
- 4.14 Overall, our view, reflected in Chapter 7, is that the region-wide need for a step change in housing provision requires a region-wide response, albeit one which is founded on the distinctive role of different towns, the opportunities as well as the limitations to growth in some locations, and the unsuitability for high growth of many other areas (within as well as outside the LSCP area). This is the approach we have taken in considering the spatial strategy and also in reviewing the issues at a sub-regional level. Where we have identified opportunities for significant growth outside a designated Growth Area or candidate “New Growth Point”, it may still be right for Government to consider the case for support. Without wishing to deflect the Growth Areas programme from its purpose, we consider it important that the support of the Sustainable Communities Plan should be available to other places dealing with significant concentrations of growth, so that there is some assurance that growth provided for in the spatial strategy will be delivered in a sustainable form.
- 4.15 Returning to our proposed replacement policies SS2-SS4, EERA’s general approach of basing housing provision on “urban concentration” in the main regional and sub-regional cities and towns was generally supported as the most sustainable option since these are the principal centres of employment, retail and service sector functions and for inter/intra-urban transport opportunities. Despite this plenty of disagreement occurred about the scale of development steered towards most of the key centres identified in SS2. We discuss these centres in more detail in Chapter 5 of this report where we consider all the key centres individually. Summarising the position generally, we have supported the concept of the key centres but regarded them in a slightly modified light as regional and sub-regional growth points for accommodating the major quantities of housing and other development. This has led us to exclude the Stansted/A120 corridor towns, (which are not suitable candidates for strategically significant scale growth) and Watford (as a generally already built-up Borough where the scale of expected housing growth is not regionally high). We have included Thetford which does have considerable growth prospects, and Hatfield/Welwyn Garden City as well as Hemel Hempstead and Stevenage as established new towns with potential for growth and rejuvenation.
- 4.16 Where calls were made for wider distribution or dispersal of growth this was generally in the context of developers wishing to increase the number of towns specifically mentioned in the RSS as recipients for growth, usually on the scale below key centres, ie the medium-sized and smaller towns and market towns. A wide range of reasons were advanced in support of the particular claims of any individual town (eg a nodal location, economic buoyancy, popularity in market terms, a need for regeneration/renaissance, a requirement for more critical mass at certain more remote market towns, or a location within or close to the LSCP Growth Area). However, the common factor was usually that identifying such towns for a specific role within the

regional growth agenda would increase the number of potential sites and so help to boost housing output and speed delivery. There may be some advantages in these terms, but in our view the detailed distribution of an individual LPA's allocated growth as between its regional key centre (if it has one) and the various other towns and market towns in its area is very much a matter for determination through its core strategy and site allocations LDDs, provided that the emphasis on urban concentration is retained. In keeping with this view we have recommended the deletion of references to a number of smaller towns in the region and it would be inconsistent with that approach to support others for inclusion in the RSS, although many no doubt have legitimate claims for a proportion of their District's allocation. Nonetheless we support the view that it will be advantageous for LDDs to identify a good number of development locations and try to ensure as far as practicable that completion rates within large urban extensions are accelerated by offering a wide choice of house-types and developers. This is reflected in our recommendation **R7.1** on the approach to implementing the regional housing provision.

- 4.17 The potential role of new settlements was also discussed, mainly in the context of a significant number of suggestions for new settlements of around 5,000 dwellings, as another means of boosting the number of market options and thus the potential for completing more dwellings pre-2021. We refer to some of these suggested locations in Chapter 5 of this report. The proposals were often highly site specific and thus inconsistent with the expectations of PPS11 about location specificity (ie that broad locations are areas of search within which a number of suitable sites may exist). We were also not convinced that small new settlements of this general size would rank sufficiently high up the scale of sustainability to merit including them as a significant component of the spatial strategy.
- 4.18 In addition to these locations, participants identified a smaller number of options for bringing forward a larger settlement of up to 25,000 dwellings as part of the current version of the RSS rather than leaving the matter to be investigated during an "early review" of the plan as proposed in policy SS2 of the draft Plan. We believe that a carefully planned and located new settlement on that kind of scale would have the potential to be a considerably more sustainable option than a series of smaller ones, and (since there may well be limits to the further intensification/expansion of development at some of the current regional growth points, beyond that now identified) we see this as a next logical step if regional growth is to continue into the medium and longer term. However, there is no consensus around this issue at present and our recommendations for Policy H1 should provide a more effective way of increasing housing supply in the shorter term. We therefore support EERA's approach that a larger new settlement is an option to be progressed through the review, as discussed further in Chapter 11 of this report.
- 4.19 A matter often commented upon was the question of how much priority should be afforded to the development of previously-developed land. The draft Plan, at SS4, adopts the national target of seeking to ensure that 60% of all new development takes place on PDL, while SS2 and SS3 generally reflect the PPG3 approach to the sequential test. While suggestions were made for the regional target to be raised, EERA's District-by-District information on housing land shows, as one would expect, quite a divergent picture across the region. This was pointed up in many of the sub-regional sessions. Some of the more urbanised areas are certainly achieving quite a lot more than this and policy should continue to encourage them to do so. One of the major advantages of the urban concentration option is that it builds on this potential and facilitates its encouragement. On the other hand, there are other locations where regional growth needs and potentials will not be able to be satisfied without developing green field sites.

Provided that other principles of sustainability are not compromised we see no justification for failing to provide adequately for this. In particular, we would not accept the view that the priority for re-using PDL should over-ride the need to bring forward a sufficient quantity and variety of land to ensure that the planned level of development is delivered.

- 4.20 The above conclusions on the overall spatial approach to growth and the Key Centres for Development and Change are covered in our recommendations **R4.2** and **R4.3** for new Policies SS2 and SS3.

### **Market towns and rural areas**

- 4.21 Turning to draft Plan Policy SS9, the aims of this were generally supported although its important reference to market towns was often overlooked by those who sought more coverage of rural areas elsewhere in the Plan. In our view the essential material from this policy is best placed earlier in the SS policies, as new Policy SS4, after the discussion of the key centres in new Policy SS3, to emphasis the way in which LDDs will deal with the individual range of settlement issues across any District. This is reflected in our recommendation **R4.4**.

### **Town Centres**

- 4.22 Draft Policy SS5 attracted relatively few comments. In our view it appropriately reflects the importance of the region's city and town centres as focal points for sustainable development. We recommend its retention (as new Policy SS6) with a certain amount of editing **R4.6**.

### **Green Belt**

- 4.23 Draft Policy SS7, not surprisingly, gave rise to a considerable volume of representation. Many expressed their perception that the Green Belt is continuously being eroded by a steady trickle of small developments and under constant threat from larger scale developments. They therefore call for deletion of the notion of any review, anywhere within the region and seek expressions of even stronger protection. Others suggest a wider pattern of reviews to allow development rates to accelerate by bringing on stream a greater number of development locations at the more popular and buoyant Green Belt towns within reach of London. However, we have not found any reason for fundamental change to the general thrust of this policy. In our discussions of the sub-regions and key centres for development we have supported the draft plan in identifying exceptional circumstances for reviewing and altering Green Belt boundaries around Stevenage and Harlow and concluded that strategic reviews are also justified around Hemel Hempstead and in Welwyn-Hatfield District. For Broxbourne it is clear that the development in prospect will entail more local review of Green Belt boundaries. At Bishop's Stortford the "Areas of Special Restraint" which will provide for the main additional growth in the town are not in the Green Belt. On that basis we agree that any more local boundary adjustment that may be necessary should be for the LDD within the framework provided by PPG2. We have not been convinced of a need for, or that Green Belt purposes would be best served by, review of the Green Belt in the Essex Thames Gateway area. We have also agreed that no further review of the Cambridge Green Belt is needed up to 2021. The Green Belt reviews referred to in our recommended version of SS7 would result in significant change in local terms, but we consider that they can be implemented without fundamentally eroding the principles and functioning of the Green Belt.
- 4.24 The concept of compensatory Green Belt was raised on a few occasions during the EiP, usually with a degree of puzzlement about how such land (necessarily having to fulfil genuine Green Belt purposes) would come to be identified and designated if, as could

well be the case, it did not lie within the boundaries of the local planning authority or authorities proposing to make the Green Belt release. This is not an issue that can be solved in individual cases in advance through the RSS, but we support the general form of the wider cooperative mechanisms suggested in policy SS7. At Stevenage we have specifically identified one area where we conclude that compensatory Green Belt would be appropriate (R5.11), and it should also be considered as a possibility in relation to the Luton/ Dunstable/ Houghton Regis area. Our recommendation for change to policy SS7 is at R4.7.

**Other spatial strategy policies**

- 4.25 Draft Policy SS8 attracted relatively little comment and we recommend only minor rewording (R4.8).
- 4.26 Draft Policy SS11 identifies priority areas for regeneration based upon a study carried out in 2002. We have no reason to doubt the objectiveness of the study’s findings, although it is not always clear whether it is the whole District or just a town within it which is being identified (eg Peterborough and Colchester) and it seems possibly anomalous that the whole areas of some Districts/towns are identified as “areas with high deprivation” (eg Norwich and Colchester), whereas in other cases particular wards are identified (eg Cambridge and St Edmundsbury). Some find the nature and policy implications of the “priority” to be accorded to these areas somewhat unclear and would wish for further breakdown of the prioritisation between the SS11 locations.
- 4.27 We can understand these representations but, on the whole, and subject to the clarification of the above points, we consider that the policy should be included in the spatial strategy as a means of drawing attention to the regional priorities that need to be addressed through LDDs and other strategies. We therefore recommend (R4.5) its inclusion as new Policy SS5 with some minor rewording/reordering to improve clarity.
- 4.28 Draft Policy SS15 drew a relatively small number of comments. Suffolk Coastal DC argued for LDDs and shoreline management plans to be integrated, but we consider this could lead to inflexibility, and delay for both processes. What is important is that they are compatible, which is conveyed by the policy as it stands. We support its general principles but our recommendation adopts some clarified and more concise wording and brings it into line with our other recommendations, for example in the reference to policy E4 (R 4.9).

**RECOMMENDATIONS:**

**R4.1** Insert a new overarching spatial strategy policy SS1 as follows:

**SS1: Achieving sustainable development (overarching policy)**

The strategy seeks to bring about sustainable development by applying:

- (1) The guiding principles of the UK Sustainable Development Strategy 2005:
  - living within environmental limits;
  - ensuring a strong, healthy and just society;
  - achieving a sustainable economy;
  - promoting good governance;
  - using sound science responsibly; and
- (2) The elements contributing to the creation of sustainable communities as expressed in Sustainable Communities: Homes for All, summarised as being:

- active, inclusive and safe (in terms of community identity and cohesion, social inclusion and leisure opportunities);
- well run (in terms of effective participation, representation and leadership);
- environmentally sensitive;
- well designed and built;
- well connected (in terms of good transport services);
- thriving (in terms of a flourishing and diverse economy);
- well served (in terms of public, private, community and voluntary services); and
- fair for everyone.

To do this, local development frameworks and other statutory and non-statutory strategies relevant to spatial planning within the region will aim to:

- (a) assist the achievement of national obligations under the Kyoto Treaty; and
- (b) adopt a precautionary approach to climate change by avoiding or minimising potential contributions to adverse change and incorporating measures which adapt as far as possible to unavoidable change.

In particular, the spatial strategy seeks to ensure that development in the region:

- maximises the potential for people to form more sustainable relationships between their homes, workplaces, and other concentrations of regularly used services and facilities, and their means of travel between them; and
- respects environmental limits by seeking net environmental gains wherever possible, or at least avoiding harm, or (where harm is justified within an integrated approach to the guiding principles set out above) minimising, mitigating and/or compensating for that harm.

**R 4.2** Insert a new spatial strategy policy SS2 as follows:

**SS2: The overall spatial strategy**

In seeking the more sustainable relationships described in Policy SS1 the spatial strategy primarily directs strategically significant growth to the region's major urban areas where:

- strategic networks connect and public transport accessibility is at its best, and has the most scope for improvement; and
- greatest opportunity is present to build upon existing concentrations of activities and physical and social infrastructure and to use growth as a means of extending and enhancing them efficiently.

Within this context LDDs will develop policies which:

- ensure that new development contributes towards the creation of more sustainable communities in accordance with the definition above and, in particular, require that new development contributes as appropriate to the improvement of quality of life, community cohesion and social inclusion, including making appropriate and timely provision for the locally identified needs of the health and social services sectors and the primary, secondary, further and higher education sectors, particularly in areas of new development and in the priority areas for regeneration; and,
- adopt an approach to the location of major development which prioritises the re-use of previously developed land in and around urban areas to the fullest extent possible while ensuring provision of an adequate total supply of land for development consistent with

the achievement of a sustainable pattern of development and the delivery of housing in accordance with Policy H1.\*

NB \* The overall regional target for the re-use of previously developed land is set at 60% although the extent to which this is achieved will vary across the region. It may be necessary at certain times and in particular places (as identified in LDDs) to depart from the strict terms of a sequential approach to previously developed land if this is essential to bring forward development to meet the requirements of Policy H1, provided this is otherwise consistent with the principles of sustainable development.

[Supporting text: Consolidate at this point appropriately edited/augmented references to region-wide social and community issues, incorporating any relevant material from paragraphs 4.56-4.61 and 11.36-11.40.]

**R 4.3** Insert a new spatial strategy policy SS3 as follows:

**SS3: Key regional centres for development and change:**

In order to achieve the aims of policies SS1 and SS2, new development to 2021 will be concentrated at the following locations (in alphabetical order):

Basildon	Bedford/Kempston/Northern Marston Vale
Bury St Edmunds	Cambridge
Chelmsford	Colchester
Great Yarmouth	Harlow
Hatfield and Welwyn GC	Hemel Hempstead
Ipswich	King’s Lynn
Lowestoft	Luton/Dunstable/Houghton Regis
Norwich	Peterborough
Southend-on-Sea	Stevenage
Thetford	Thurrock urban area

The scale, nature and rate of development and change in these areas will vary according to local circumstances and the distinctive regional growth role of each of the towns listed as Key Centres. Concentrating development at these locations will make the most of existing infrastructure and the potential for improvements or extensions to it.

Where key centres adjoin local authority boundaries local planning authorities will need to work jointly or closely together to develop co-ordinated strategies and delivery mechanisms.

The principal aims for each of the above centres (and, where relevant, its place within a sub-regional approach) are set out at the Sub-Regional chapter, Chapter 10.

**R 4.4** Include a new policy SS4, based on a changed version of policy SS9

**SS4: Development in other towns and rural areas**

Development will take place in other towns to the extent identified in local development documents. Such towns will include selected market towns serving rural areas and other towns with the potential to increase their degree of economic and social self-sustainability through measures to:

- support urban and rural renaissance;
- secure appropriate amounts of new housing (including affordable housing), and local employment and other facilities; and

- improve the town's accessibility, especially by public transport.

Local development documents will also consider the potential of other key service centres to accommodate new smaller-scale development which is sympathetic to local character and of an appropriate scale and nature to accommodate local housing and employment needs.

In all other rural settlements and related communities local development documents should seek to assist the continued viability of agriculture and other rural economic activities (such as tourism), the diversification of the rural economy, the provision of housing for local needs, and support for the sustainability of local services.

**R4.5** Include a changed version of draft Plan Policy SS11 as follows:

**SS5: Priority areas for regeneration**

Include a changed version of draft Plan Policy SS11, subject to further editing to improve clarity in accordance with paragraphs 4.26-4.27 above, as follows:

- areas with weak economic performance and high deprivation:- Essex Thames Gateway; Great Yarmouth and Waveney; Kings Lynn and West Norfolk; the remote rural areas of Norfolk and Suffolk, and the Fens (transitional EU objective 5b areas see map 11.1).
- areas with high deprivation:- Luton/Dunstable/Houghton Regis; Bedford/Kempston; Harlow and the Lee Valley; Haven Gateway (Ipswich/Harwich/Colchester/Clacton); Peterborough; Norwich; Stevenage; and parts of Cambridge (King's Hedges and Arbury wards) and St Edmundsbury (Clements and Northgate wards).

Local development documents will set out policies to tackle the problems of economic, social and environmental deprivation in these areas together with policies for other areas with locally significant need for regeneration.

**R4.6** Include a changed version of policy SS5 as follows:

**SS6: City and Town Centres**

Thriving, vibrant and attractive city and town centres are fundamental to the sustainable development of the East of England and will continue to be the focus for investment, environmental enhancement and regeneration.

Local development documents, supported by transport plans and relevant economic, environmental and cultural strategies, will:

- include a strategy for each city or town centre to define its role (or redefine it where necessary), manage change, promote a healthy mix of uses, build upon positive elements of its distinctive character, and support the development and consolidation of the local cultural heritage;
- ensure that land is allocated or can be made available to meet the full range of the city or town centre's identified needs; and
- protect and enhance existing neighbourhood centres and, where need is established, promote the provision of new centres of an appropriate scale and function to meet local day to day needs.



**R 4.7** Include a changed version of policy SS7 as follows:

**SS7: Green Belt**

The broad extent of Green Belts in the East of England is appropriate, and will be maintained. However, strategic reviews of Green Belt boundaries are needed at the areas identified below to meet regional needs for development at the most sustainable locations:

- Stevenage, involving land in Stevenage and North Herts and including the consideration of compensating extension to the Green Belt;
- Hemel Hempstead, involving land in Dacorum and St Albans;
- Harlow, involving land in Harlow and in Epping Forest District;
- Welwyn/Hatfield;
- Luton/ Dunstable/ Houghton Regis, in relation to the provisions of the MKSM SRS and including the consideration of compensating extension to the Green Belt involving land in South Beds and North Herts Districts; and
- More local review will be required in Broxbourne (the Upper Lee Valley).

These reviews will have to satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that sufficient land is identified to avoid further Green Belt review before 2031. Where reviews cover more than one local authority area, the expectation is that they will be undertaken through a joint approach.

The RSS does not provide for review of the Cambridge Green Belt beyond that undertaken recently through the Structure Plan and related local plans/LDDs.

In order to maintain the broad extent of Green Belts across the region, the above reviews will consider possible needs for compensatory additions to the Green Belts. These will have to satisfy the national criteria for designation and complement delivery of the spatial strategy. Such extensions will be proposed in local development documents. In cases where the proper consideration of compensatory additions affects land in more than one administrative area local planning authorities will prepare co-ordinated and complementary strategies for such additions.

**R 4.8** Include a changed version of policy SS8 as follows:

**Policy SS8: Land in the urban fringe**

Local authorities will work together with developers and other agencies to secure the enhancement, effective management and appropriate use of land in the urban fringe through formulating and implementing strategies for urban fringe areas across administrative boundaries where appropriate.

Local development documents will:

- ensure that new development in or near the urban fringe contributes to enhancing its character and appearance and its recreational and/or biodiversity value;
- seek to provide connected networks of accessible green space linking urban areas with the countryside; and
- set targets for the provision of green space for planned urban extensions.

**R4.9.** Include a changed version of policy SS15 as follows:

**SS9: The coast**

The strategy for the coast is to adopt an integrated approach that recognises the needs of the coast for environmental protection and enhancement and the economic and social role of the

region's ports, seaside towns, and other coastal areas important to tourism. Within this approach local planning authorities and other agencies will seek, through their plans and management strategies, to achieve:

- the regeneration of coastal towns and communities, reinforcing their local economic and social roles and their importance to the wider region; and
- the conservation of the coastal environment and coastal waters, particularly the natural character, historic environment and tranquillity of undeveloped areas.

Local development documents will:

- adopt policies which support the restructuring of the coastal economies and the provision of jobs to satisfy local needs;
- treat Great Yarmouth, Lowestoft, Ipswich, Harwich and Felixstowe as regional strategic employment locations in accordance with policy E4;
- ensure, in the case of any coastal resort that:
  - the town centre continues to provide for local and visitor needs;
  - improved linkages are created between the town centre and the main leisure area(s) to secure mutual strengthening of their vitality and viability; and
  - retailing in the main leisure area(s) is limited to that necessary to support the vitality and viability of the leisure function without having an adverse effect on the retail function of the town centre.
- ensure that new development is compatible with shoreline management plans (shown in Table 4.1), so as to avoid constraining effective future flood management or increasing the need for expensive new sea defences;
- protect important coastal environmental assets if it is practicable and sustainable to do so without causing adverse impacts elsewhere. If it is not practicable to protect sites and habitats in situ, shoreline management plans and development plans will include proposals for their long-term replacement or the recording of historic assets; and
- investigate and pursue opportunities for creation of new salt marsh and mudflat by managed realignment in areas identified for retreat. New development will not be permitted in such areas.

**R4.10** Delete draft Plan policies SS6, SS10, SS12 and SS13.

**R4.11** Insert a changed version of policy SS16 into the Environment Chapter as follows:

**ENVxxx: Achieving quality in the built environment**

Local development documents will require new development to be of high quality which:

- either complements the distinctive character and best qualities of the local area or (in areas identified in an LDD as requiring a new preferred townscape/landscape character) assists the necessary process of transition;
- assists urban renaissance and regeneration where appropriate;
- provides landmark buildings of an appropriate scale;
- makes efficient use of land;
- in the case of housing development:
  - is built at the highest possible net density commensurate with an assessment of the

character of the locality, and no less than 30 dwellings per hectare;

- delivers greater intensity and density of development in places with good public transport accessibility, while respecting local character objectives (see above);
- provides a mix of uses and building types where appropriate;
- has regard to the needs of all sectors of the community;
- addresses crime prevention, community safety and public health;
- promotes resource efficiency, and more sustainable construction, including maximum use of re-used or recycled materials and of local and traditional materials;
- reduces pollution;
- maximises opportunities for the built heritage to contribute to physical, economic and community regeneration; and
- maximises opportunities for access by a choice of travel modes.

**R4.12** Insert a changed version of policy SS14 into the Environment Chapter as follows:

**ENVxxx: Achieving long-term safety from flood risk**

Risk of coastal and river flooding is a significant factor in parts of the East of the England. The priorities are to defend existing properties from flooding and, wherever possible, to locate new development in locations with little or no risk of flooding.

Local development documents will therefore:

- promote the use of strategic flood risk assessments to guide development away from floodplains, other areas at risk (or likely to be at future risk) from flooding, and areas where development would increase the risk of flooding elsewhere;
- include policies to protect flood plains and land liable to tidal or coastal flooding from development, based on the Environment Agency's flood zone maps, supplemented where necessary by historical and modelled flood data (eg Section 105 maps) and indications as to other areas which could be at risk in future (including proposals for 'managed retreat' where appropriate);
- only propose departures from the above principles in exceptional cases where suitable land at lower risk of flooding is not available, and the benefits of development outweigh the risks from flooding, and appropriate mitigation measures are designed into the scheme; and
- require that sustainable drainage systems are employed in all appropriate developments.



## CHAPTER 5 - SUB-REGIONS/LOCATIONS

### POLICIES FOR SUB-REGIONS AND SUB-AREAS

#### Approach to the sub-regions/sub-areas

- 5.1 The seven sub-regions and seven sub-areas covered in Chapter 5 of the draft Plan accounted for a large proportion of the time spent at the EiP. This was partly a reflection of the degree of detail of some of the matters discussed, but also reflects the prominence given by the draft Plan to the sub-regional content. The discussion in Matter 8A reflected quite a considerable degree of concern and confusion about the basis and role of the sub-regional policies. Some participants sought greater clarity and tidiness, with more consistency in the level of policy coverage. For example some sub-regions include environmental policies and/or transport priorities while others do not. There was also concern about the definition and status of the sub-regions and sub-areas, and the relationships between sub-regions and sub-areas, especially where they appear to overlap, and between them and the “generic” policy areas. The degree of specificity was another issue in the discussion. In some cases people considered that the draft Plan included detail more appropriate to LDDs, while in others there were calls for the Plan to include more specific content.
- 5.2 The draft Plan’s sub-regions and sub-areas appear to have originated in the sub-regional content of the previous RPG6 and RPG9, modified and added to in the light of subsequent developments including the LSCP Growth Area and emerging Structure Plan proposals. In consequence the approach varies between a fairly full reflection of recently adopted Structure Plans (eg Cambridgeshire) and new sub-regions or sub-areas (eg London Arc and Stevenage). We understand the desire for more consistent treatment, but we take the view that consistency should not mean uniformity. The principle should be that the RSS should include only as much sub-regional content as is necessary to amplify the spatial strategy and to resolve matters that cannot be left to the local level. We share the widespread view that matters should be determined at local level through the LDD process except where there is a strategic reason for guidance from the regional level. There are some coherent sub-regions covering several districts across which a concerted strategic approach makes sense. In other places, however, it is often a matter of a single town where growth extends across administrative boundaries into neighbouring districts, but there is not a wider sub-regional planning issue. In those situations, while the RSS needs to give some guidance, this does not need to take the form of a comprehensive sub-regional strategy.
- 5.3 If the above principles are followed, the sub-regions should be no more than an adjunct to the main spatial strategy of the RSS. We appreciate that this may have been what EERA intended with the draft Plan, but the extent and prominence of the sub-regional content has conveyed a different impression. For example many people appear not to have understood that all the “SS” and thematic policies apply within the sub-regions and sub-areas as well as to the “generic” areas while others, seeing detailed provision for one sub-regional location, have concluded that unless there is a similar level of detail for their area of interest there will be some kind of policy deficit. We conclude that the complex structure of sub-regions and sub-areas, and amount of policy detail included for those areas, goes beyond what is justified by any material strategic policy deficit. Our proposals counteract this in two ways. Firstly, we propose strengthening the Spatial Strategy and making the thematic policies, particularly those for environmental

issues, more prominent within the overall structure of the RSS, so that it is clear that they apply throughout the region. Secondly we propose more selective policy coverage in the sub-regional policies, which would be in a section following all the region-wide policies (**R5.1**). The sub-regional policies are limited to what is necessary to amplify the Spatial Strategy in relation to the Key Centres for Development and Change, and to convey a broader sub-regional approach in the limited number of cases where policy development at that scale is really required.

- 5.4 With regard to the definition of sub-regions and sub-areas, some participants sought certainty and clarity by having areas defined in terms of whole districts, or specified parishes. Where the geographical extent of an area needs to be resolved for clarity at a regional level, we have covered the point below, but we do not consider it necessary for the RSS to include precise definitions everywhere, and to do so could create a misleading idea of the precision with which the policies are drawn. Detailed definitions will, however, be necessary for monitoring purposes and this should be pursued locally through LDDs and, where appropriate, by consultation between authorities.
- 5.5 In the sections below we consider each of the sub-regions and sub-areas in the order in which they appear in the draft Plan. We propose a number of changes, in particular, replacing the nomenclature of sub-regions/sub-areas for (in Plan order) Norwich, Great Yarmouth/Lowestoft, Thetford, Greater Peterborough, Stansted/M11, Stevenage, Bury St Edmunds and King’s Lynn. Our proposals refocus policy on the distinctive roles of the principal centres in these areas as Key Centres for Development and Change. This leaves four areas which we conclude form genuine sub-regions requiring a broader area wide approach. These are: Thames Gateway, Haven Gateway, Cambridge and the London Arc. The East of England component of the MKSM Sub-Regional Strategy makes a fifth. In Essex we have slightly adjusted and renamed the Thames Gateway/South Essex Sub-Region, and identified a policy role for Chelmsford as a Key Centre. We also give a clearer identity and purpose to the London Arc as a sub-region, within which we have identified Hemel Hempstead and Welwyn/Hatfield as Key Centres. We have also concluded that the Norfolk and Suffolk Broads do not warrant sub-area treatment in policy terms. Overall we have generally reduced the volume of policy content to provide a consistent strategic approach reflecting our conclusions above.

## RECOMMENDATION:

### **R5.1**

The sub-regional policies of the Plan should come in a chapter to follow all the Spatial Strategy and thematic policies (but before the Implementation Chapter) and should contain strategies for each of the sub-regions and individual policies for the Key Centres for Development and Change (KCDCs) not covered by those sub-regions.

## THAMES GATEWAY/SOUTH ESSEX SUB-REGION

- 5.6 As defined in the draft Plan the Thames Gateway/South Essex Sub-Region (TG/SESR) comprises the five local authority areas of Thurrock, Basildon, Castle Point, Southend and Rochford. Contained within the sub-region is Thames Gateway South Essex (TGSE), the Essex portion of the Thames Gateway Growth Area defined in the Sustainable Communities Plan. As described in a footnote to p46, the Growth Area “broadly encompasses the areas south of the A13 in Thurrock and the A127 in Basildon, together with the whole of the Boroughs of Castle Point and Southend-on-Sea and London-Southend Airport in Rochford.”

- 5.7 We agree with a number of respondents that this clash of terminology is undesirable and confusing to plan-users and have considered the suggestions made about ways in which more clarity could be introduced. In our view the most appropriate approach is to limit the sub-region to the Thames Gateway Growth Area, with Rochford (minus the airport) and the northern parts of Thurrock and Basildon being treated as part of the generic policy areas. The TG/SE policies say little about those areas, and their inclusion in the sub-region tends to detract from proper focus on the Growth Area. An appropriate title for the reduced sub-region/growth area would be “Essex Thames Gateway” (ETG) which would have the merit of complementing the term “Kent Thames Gateway” used in the submitted South East Plan.
- 5.8 In our view policy TG/SE1, with its mixture of unclear references to “complementary regeneration hubs” and “zones of change and influence” on the one hand, and its inappropriate site-specific detail on the other, fails to communicate a clear overarching sub-regional planning vision. We agree with those who have suggested introducing a new policy containing the gist of the vision set out in draft Plan paragraph 5.8 and recommend accordingly (**R5.2** new Policy ETG1). In addition our recommended new policy recognises Thames Gateway’s complementary role in relation to London, emphasises the commonly-acknowledged need to create a more positive image for this part of South Essex by achieving townscapes and landscapes of higher and more distinctive quality, and sets the aim of seeking to achieve modal shift towards public transport.
- 5.9 Complementing this new policy we recommend separate policies for the three “key centres for development and change” identified in draft Plan Policy SS2 (Thurrock Urban Area [new Policy ETG2], Basildon [new Policy ETG3] and Southend [new Policy ETG4]) stressing the themes of re-use of brownfield land, urban renaissance and the establishment of an integrated high-quality public transport system linking all the principal new and existing development nodes in South Essex. Consistent with the approach in our recommendations elsewhere we do not consider it necessary to include site-specific references, even substantial ones such as Gardiner’s Lane South. These are the proper preserve of LDDs.
- 5.10 Turning to housing growth, the draft Plan proposes an annual rate of growth about 35% higher than the Structure Plan/UDPs. There are increased rates in all five Districts although Southend and Thurrock have the greatest proportional annual increases. Most of the LPAs are content with their allocations, although some find them challenging, and Essex CC seeks reduction by 3,800 to accord better with “natural growth” needs and their view of investment prospects. From figures submitted by Southend it appears that assessed urban capacity for that District may bring forward slightly more dwellings than previously expected so we add additional provision of 500 to reflect that. However, some developers seek much more additional growth, usually coupled with suggestions for a firmer statement about the need for review of the inner boundaries of the Green Belt as a more central part of the vision for the area. Cases are made in that respect for locations such as North Tilbury, East Tilbury/Linford and to the north of Southend.
- 5.11 It appears that the proposed level of growth can be accommodated mainly on previously developed land, urban capacity sites and other already-identified land, so the reference in policy SS7 to the requirement for Green Belt review in Thames Gateway is not strictly necessary to achieve delivery of the policy H1 allocations. At the EiP EERA confirmed this to be the case. In our view it is important to concentrate efforts in the short-medium term on the difficult challenge of completing the proposed number of new homes by maximising recycling of brownfield land and building on already-identified areas, rather than diluting the vision by dispersing development onto Green

Belt areas. As indicated by GO-E, the scope for stimulating maximum re-use of previously-developed land was one of the primary reasons for identifying Thames Gateway as a Growth Area in the first place. Focusing directly on that course of action is likely to do most to assist the imperative need for renaissance and regeneration and uplift the unfavourable image of the area as soon as possible. In any case, as ETG is already a highly developed area where the open spaces between settlements are often narrow, there is particular importance in maintaining such stretches of open countryside as still remain. We recognise that a time may come when a strategic review of the Green Belt may be justified to address longer-term growth requirements but the time for that is not now. We therefore recommend deletion of the reference to the strategic review of Green Belt in TGSE in draft Plan Policy SS7. In the meantime the emphasis for the Green Belt should be on making better use of it for more positive greenspace purposes. We reflect this in our recommendations.

- 5.12 Our conclusion takes account of suggestions that a review of the Green Belt is required in the vicinity of Southend Airport. We have supported reference to the airport in the “key centre” policy for Southend but consideration of any need that may or may not exist for Green Belt revision as part of that development is a detailed matter for determination through LDDs.
- 5.13 Some issues were raised about the amount of development proposed in those parts of Basildon and Thurrock outside the Essex Thames Gateway area but we heard nothing to lead us to conclude that the split in Basildon in draft Plan Policy TG/SE6 is inappropriate. Turning to Thurrock, for the reasons summarised in the preceding paragraph we do not support the Thurrock Thames Gateway Development Corporation (TTGUDC) or the EoE Consortium in their suggestions that exceptional circumstances currently justify revision of the Green Belt on the fringes of Aveley and South Ockendon to identify land for house-building. However, the zero figure in draft Plan Policy TG/SE6 would be misleading if it were taken to imply that a moratorium should be placed on any otherwise acceptable “churn” of previously developed land in those two places. We recommend the deletion of draft Policy TG/SE6 as it adds nothing that will not adequately be covered by other policies within the RSS but the above points are worthy of footnotes to Policy H1.
- 5.14 On the issue of employment, the target increase of 55,000 is widely regarded as challenging compared with the 35,000 achieved 1982-2001 and the other scenarios set out in Table 6.1 of this report following paragraph 6.8. However, it is considered attainable by a recent study carried out for the TGSE Partnership provided significant restructuring of the sub-regional economy takes place. We accept that considerable uncertainty exists about a number of factors – such as how fast employment will build-up at a number of the critical new sites (the port at London Gateway and the other major new sites at Gardiners Lane South, Shoeburyness, Southend Town Centre and Thurrock) as compared with how fast job numbers may decline in some more traditional areas, particularly on brownfield sites. This will make it crucial for the implementation agencies to ensure that conditions are right for the planned large projects to make progress as fast as possible and that alternatives can be developed if delivery on the key sites is slower than expected. In our view the employment targets set out in draft Plan Policy TG/SE2 represent reasonable aspirations for the area although in view of the uncertainty about the rate of build-up (and to make treatment of ETG consistent with the presentation of employment targets for other areas) we recommend including only a single employment target for the entire plan period rather than breaking it down into two separate decades. We find no particular need to deflect attention from the above major sites by substituting any of the areas suggested by some participants for employment-related development in association with mixed-use green field locations. It



is also important to bear in mind that residents in this area will continue to have access to major new sources of employment within the London parts of Thames Gateway provided that the priorities for further development work in the Regional Planning Assessment for the Railway (TRN97) are vigorously pursued, as we recommend.

- 5.15 The role of Lakeside was considered during the matter 8B sessions. The supporting text at draft Plan paragraph 6.42 states that its role will be determined through LDDs but the context to this comment is draft Plan Policy E12 which presents the options for existing out-of-town centres as being whether they should (a) remain purely retail, or (b) develop into town centres with a full range of service provision. The understandable ambition of TTGUDC and Thurrock Council is to bring about a major transformation in the current image of the basin as a featureless mass of low-grade retail warehousing and industry surrounding the Lakeside Centre itself by developing a master plan allowing for phased redevelopment with a wider mix of uses. To that end they seek Lakeside's identification as a major regional centre in draft Plan Policy E9, recognising that PPS6 (paragraph 2.14) expects that any identified need for expansion of an out-of-town regional or sub-regional centre will be addressed in the RSS.
- 5.16 We strongly support the concept of transformational regeneration and change in the wider Lakeside Basin (which we understand to be the area between the M25 to the west, the A1306 to the north, the A126 to the east and – to the south – the residential areas north of London Road West Thurrock) as this is generally a visible and accessible area and could become still better connected. If successfully achieved, an appropriate mix of high quality development here could be a key factor in changing perceptions of the area, supporting its economic development and helping to achieve a local step-change in housing provision. We recognise that Lakeside is ranked 3<sup>rd</sup>/5<sup>th</sup> (Experian/Venuscore) as a retail centre in regional terms and 32<sup>nd</sup>/57<sup>th</sup> in national terms. We have also studied the report by Capital and Counties. However, we are not convinced that it is appropriate or necessary to classify Lakeside as a regional centre in PPS6 terms as in our view national policy would give greater sequential preference to nearby towns such as Basildon, Romford and Southend as centres to gain from any increased sub-regional expenditure. Our recommendation reflects this view by supporting the development of a long-term strategy for upgrading the basin but within an overall context of no net gain in retail floorspace and a complementary requirement to devise a strategy for revitalising nearby Grays town centre and the other centres in Thurrock.
- 5.17 In line with our recommendations for other sub-regions we recommend deletion of draft Plan Policies TG/SE4 and 5 as in our view issues concerning the environment and community infrastructure are given more consistent focus by including them within single region-wide policies on these matters.

#### **RECOMMENDATION:**

**R5.2** Delete draft Plan Policies TG/SE1-7 and replace with New Policies for Essex Thames Gateway

#### **Policy ETG1: Strategy for the sub-region**

The sub-regional strategy aims to achieve transformational development and change throughout Essex Thames Gateway which will:

- substantially increase the numbers of homes and jobs to bring about greater sub-regional alignment of homes and workplaces while also continuing to recognise and make the most of the area's complementary role in relation to London, especially the emerging development/transport nodes in East London at Stratford and elsewhere;

- give the area a more positive and attractive image by building on its strengths and assets, promoting excellence in the design of buildings and the public realm, and creating new townscapes and landscapes of high quality and distinctiveness;
- significantly increase the overall value of the sub-regional economy, and the economic conditions, living standards, aspirations, and quality of life of its residents;
- enhance the education and skills base and improve access to higher education;
- protect and enhance the quality of the natural environment, including retaining the Green Belt and aiming to make more positive appropriate use of it;
- create the conditions for major modal shift towards public transport use by developing high quality/high frequency inter- and intra-urban spines across ETG; and
- bring about improvements to the strategic transport networks, particularly for the efficient movement of freight.

### **Policy ETG2: Key Centre for Development and Change: Thurrock**

The Thurrock Urban Area (from Purfleet in the west to Tilbury/Chadwell St Mary in the east) will be a Key Centre for Development and Change. Local development documents for the Borough will aim to:

- make provision for the housing and employment growth set out at policies ETG5 & H1;
- achieve an urban renaissance, re-using previously developed land to bring about substantial improvement in the quality of the urban environment;
- upgrade the image of the area as a leading centre for logistics, and enhance the scale and sustainability of its role in that respect, while also seeking to diversify the employment base of the Borough;
- link new and existing nodes of development to high quality/high frequency spines of the inter- and intra-urban public transport system to be developed across ETG;
- develop a safeguarding policy for wharves and quays considered necessary for the proper strategic functioning of the Port of London; and
- develop (a) a clear long-term strategy for remodelling Lakeside Basin to provide a high-quality, pedestrian friendly environment containing a mix of uses including retail, leisure, offices, residential and areas of public realm, subject to no net increase in retail floorspace, linked with (b) complementary revitalisation strategies for Grays Town Centre and the other urban centres in the Borough.

### **Policy ETG3: Key Centre for Development and Change: Basildon**

Basildon will be a Key Centre for Development and Change. Local development documents for the District will aim to:

- make provision for the housing and employment growth set out at policies ETG5 & H1;
- link new and existing nodes of development to high quality/high frequency spines of the inter- and intra-urban public transport system to be developed across ETG; and
- facilitate physical, economic and social regeneration of the original new town together with expansion to create a sustainable and balanced community. This will include regeneration of the town centre to secure a full range of high quality sub-regional services and facilities, including mixed-use development to provide for new jobs and homes, and development of a strategic transport interchange.

**Policy ETG4: Key Centre for Development and Change: Southend on Sea**

Southend on Sea will be a Key Centre for Development and Change. Local development documents for the District will aim to:

- make provision for the housing and employment growth set out at policies ETG5 & H1;
- facilitate physical, economic and social regeneration of the urban area including maximising the re-use of previously developed land;
- link new and existing nodes of development to high quality/high frequency spines of the inter and intra-urban public transport system to be developed across ETG; and
- create an urban renaissance of the town centre by establishing it as a focus for cultural and intellectual activities led by the development of a university campus, securing a full range of high quality sub-regional services and facilities, providing for mixed use development to secure new jobs and homes, and upgrading strategic and local passenger transport accessibility, including developing Southend Central and Southend Victoria stations as strategic transport interchanges.

**Policy ETG5: Employment-generating development**

Local development documents will provide an enabling context for not less than 52,000 net additional jobs in ETG during the period 2001-2021, distributed as follows:

District (whole LA area)	2001-2021
Basildon	11,000
Castle Point	2,000
Southend	13,000
Thurrock	26,000
Total	52,000

The local authorities and the Thurrock Thames Gateway Development Corporation, supported by regional and local partners, will seek to facilitate these net increases in jobs by promoting a competitive sub-regional business environment, to be secured through:

- making provision for a range of sites and premises suitable for the needs of existing and future businesses, including the key development site at London Gateway (a new container port facility with associated business park, together supported by strategic rail freight handling facilities) together with other sites that can contribute to supporting Thurrock’s role as a world-leading logistics centre;
- providing innovation centres at the key centres for development and change;
- improving opportunities for small and medium enterprises in all economic sectors, especially transport and logistics, environmental technologies, healthcare, and tourism and leisure;
- raising skill levels at NVQ Level 2, 3 and 4 to national averages, through enhanced provision of further and higher education, to ensure that local residents share in economic success;
- focusing major retail, leisure and office developments at Basildon, Southend and Lakeside and other centres in need of regeneration; and
- enhancing use of the River Thames as an asset for business and leisure.

**Policy ETG6: Transport infrastructure**

Related regional strategies, local development documents and local transport plans serving Essex Thames Gateway will address present and future needs to 2021, supporting development and regeneration activities by striving to achieve a ‘step-change’ in accessibility standards through the provision of improved transportation infrastructure and better management of existing facilities.

**Policy ETG7: Implementation and delivery**

The Thames Gateway South Essex Partnership will work with its partners to ensure that:

- appropriate guidance and coordination is available to ensure that local development documents prepared within ETG make complementary contributions towards meeting the objectives of the RSS, with joint working where appropriate; and
- the implementation and delivery bodies have appropriate strategies and resources to achieve the objectives reflected in the overall vision for the area at ETG1 and detailed in the other ETG policies.

**Note: Policy H1** allocations within the Essex Thames Gateway Sub-Region are:

Basildon	10,700
Castle Point	4,000
Rochford	4,600
Southend	6,500
Thurrock	18,500

## HAVEN GATEWAY SUB-REGION

- 5.18 There is a wide measure of agreement that the Haven Gateway area forms a coherent sub-region, and also on the vision for it that should be pursued. The area has proven potential for development, and capacity has been identified for strong growth over the Plan period. The local authorities and their partners in the Haven Gateway Partnership appear to have established clear aims for growth and regeneration.
- 5.19 Despite the common perceptions about the role and identity of the Haven Gateway, there were differing views about what should be its extent, particularly in Suffolk. The boundary is not precisely defined within the draft Plan but it includes parts of Mid-Suffolk, Babergh and Suffolk Coastal Districts, as well as the whole of Ipswich. EERA offered a list and maps showing which parishes were intended to be included. In relation to Babergh, there were development sector arguments that the whole district should be counted into the sub-region, while in Suffolk Coastal the District Council was also concerned about which parts of the district were in or out. Our general conclusions on the extent of and rationale for the sub-regions are given at paragraphs 5.1-5.5 above. For Haven Gateway we note that the generally agreed extent of the sub-region covers parts of a number of Districts, but we consider the splitting of district housing provision involves unnecessary complications and rigidities for local planning. The only cross boundary issues requiring special treatment arise at Ipswich, which introduces a third layer of complexity in draft Plan Policy HG3. We propose a more direct way of dealing with this at paragraphs 5.29-5.30 below. The precise geographical extent of both the Ipswich Policy Area and the Haven Gateway Sub-Region should be agreed for monitoring purposes, between EERA and the local authorities concerned.
- 5.20 Not all participants supported the approach to the Haven Gateway entirely. Environmental organisations and local groups were concerned about urban pressures on the environment, particularly through building on greenfield sites and encroachment on villages, and also concerns about increased traffic and whether development would be matched by infrastructure investment, not only for transport but also for social and green infrastructure. Essex CC shared some of these concerns and, while supporting the overall vision, argued that the level of growth for Colchester should be more cautious.
- 5.21 The concerns expressed are similar to those expressed at other growth locations in the draft Plan. As a result we have addressed them in Chapter 1 with recommendations for strengthened policies in the Spatial Strategy, so as to ensure that growth and development takes full account of all the components of sustainable communities. This does not need to be repeated in the sub-regions. We appreciate, however, that some feel that insufficient attention is given to the Haven Gateway's unique environmental assets, particularly the inland landscapes of the sub-region, including Dedham Vale and part of the Suffolk Coast and Heaths AONB. It is argued that these need recognition not only as assets for protection but also for their role and potential in the tourism economy of the sub-region. We consider this will be adequately covered by the strengthened overarching policies on the environment, in particular our recommended Policy ENV1 (see Chapter 9).
- 5.22 The employment growth targets for a total of 49,700 jobs for the sub-region between 2001 and 2021 are agreed to be challenging. Given the potential arising from port development and the buoyancy of the two main urban areas of Ipswich and Colchester, we share the view of EEDA and others that the figures are achievable, but will depend on delivery of the necessary interventions, including key infrastructure. We note the argument of some developers that a higher level of job growth would be justified (and in turn would justify more housing). However we consider the draft Plan's proposals quite challenging enough to be going on with. On the basis that the job targets do not

impose limits on the rate of growth that can be achieved in the early years, if the targets show signs of being achieved early the review of the Plan will provide an opportunity to revisit the growth targets for the latter part of the period. As elsewhere we consider the job targets should be expressed as reference values for monitoring.

- 5.23 The ports of Felixstowe and Harwich are clearly of strategic importance for the region. While the EiP was going on the Secretary of State issued decisions approving the extension of Felixstowe Dock and that he was “minded to approve” extension to the port of Harwich at Bathside Bay (since also finally approved). It is not for us to review those decisions but the EiP was reminded on various occasions not only of the environmental objections to port expansion but also of the issues raised by the movement of large volumes of freight through the sub-region. It is clear that the future growth of the ports is a key element of the vision and strategy for the Haven Gateway Sub-Region. We note the views expressed by port, local authority and other participants about the need for a separate policy on the ports. We find, however, that there is duplication, and little added value, in having both policy HG4 and the references to the ports in HG1. Our recommended revised policy includes the essential elements of both.
- 5.24 It is clear that the two major urban areas of Ipswich and Colchester, as well as the ports, comprise the three major economic drivers for the sub-region. A number of submissions pointed to inconsistencies in the draft Plan’s treatment of these locations in Policy E4 “strategic employment sites” and the supporting paragraphs. EERA was inclined to accept the need for these to be rationalised, and that Colchester should also be recognised as a Strategic Employment Location. We agree, and our proposed revision of Policy E4 (**R6.4**) now includes both Colchester and Felixstowe as well as retaining Ipswich and Harwich as Strategic Employment Locations. Some developers and others called for more specific guidance as to the number, size and location of employment sites, particularly at Ipswich. These clearly need to be tailored to the local needs and circumstances of each location, as indicated in our recommended revised Policy E4 and supporting text. Beyond this we consider detailed locations and requirements are matters that should be settled in LDDs and do not call for specific guidance in the RSS. Despite the focus on the three main economic drivers, it is important not to ignore the sub-region’s other towns and smaller settlements and their potential, and need, for a certain level of employment growth.
- 5.25 With regard to housing, the proposals in the draft Plan represent a considerable increase on previous plans, particularly at Ipswich where the annual rate of 770 dwellings is a 93% increase on the previous Structure Plan rate, while at Colchester the increase is 17% (based on EERA submission for Matter 8C, Table 2). For the rural Districts the increase is less, and for Babergh the rate of 260 dwellings per annum is a reduction of almost 25%. A number of participants made reference to the Strategic Residential and Infrastructure Study carried out by Roger Tym & Partners (RTP) for the Haven Gateway Partnership (SRS46), published in November 2005. This explored the capacity already identified for meeting the draft Plan housing requirement and potential sources of additional capacity to 2021. It found that capacity for 47,381 dwellings of the draft Plan provision of 50,840 for the sub-region had already been identified (SRS46, Table 2.7), and there was more than enough potential to find the remainder in all districts, with a total potential “surplus” of 11,052 dwellings (SRS46, Table 3.3). Bearing in mind that the RTP study has appeared late in the process and its findings and methodology have not been subject to detailed scrutiny, we do not consider undue weight should be placed on it in considering what is an appropriate level of housing provision. Nevertheless the study does show the strategy to be realistic in terms of the

- availability of relatively unconstrained land, and that there is theoretical capacity for further growth.
- 5.26 The issues for the various districts need to be considered separately. For Ipswich, which is tightly contained by the administrative boundary, the proposed provision of 15,400 dwellings appears to correspond closely with the capacity that is identified. The main direction for growth to the north of Ipswich has been the subject of previous consideration through the Structure and Local Plans, but some developers called for it to be specifically identified in the RSS, while local groups opposed to the development wished it to be ruled out. We consider that the distribution of development within Ipswich should be determined through the LDD process. The full growth potential of Ipswich goes beyond the Borough's administrative boundaries, and the draft Plan identifies quantities of housing within Mid-Suffolk, Suffolk Coastal and Babergh which, together with the Ipswich provision would make up to a total of some 20,000 additional dwellings in the period 2001-2021. This perpetuates the approach of the "Ipswich Policy Area" (IPA) in the Suffolk Structure Plan.
- 5.27 The amounts identified in this way appear unduly precise and allow little flexibility as between one location and another. They are also of some concern to Babergh and Suffolk Coastal districts. For Babergh the concern is that the proposed allocation of 600 dwellings to the edge of Ipswich threatens coalescence and inappropriate development in villages at the Ipswich fringe within Babergh. The Council calls for a reduction to 400, arguing that there are more appropriate places for the remaining 200 elsewhere in the District. There is an implication that unless this adjustment is made there may be insufficient provision to meet needs elsewhere in Babergh as the District's allocation of 2,000 dwellings in Policy HG3 would be regarded as a ceiling. We note also Babergh's argument that Ipswich is not regarded as a primary housing location to serve Babergh district. In our view this misses the point that the purpose of allocating provision to the edge of Ipswich is to meet Ipswich requirements. It would be perverse if that allocation were felt to deprive Babergh of sufficient housing for its own needs or, conversely, if any failure to implement the development at the edge of Ipswich were felt to necessitate inappropriate development in Babergh villages instead.
- 5.28 Without entering into matters of local detail, we consider there is probably sufficient capacity to deliver the amount of housing proposed, or even more, on the edge of Ipswich without encroaching on the surrounding rural settlements. One of the principles for any such development is that it should be contiguous with and well related to the existing urban area. The other related question is the adequacy of the proposed Babergh allocation of 5,200 dwellings (260 per annum) between 2001 and 2021 in draft Plan Policy H1 (2,000 in the HG sub-region). This is a considerable scaling down of the previous Structure Plan rate, (equivalent to 345 per annum), and on rates of delivery over recent years (321 per annum between 2001 and 2004 – EERA submission for Matter 8C, Table 3). Several development sector submissions also argued for higher provision for Babergh District, and the RTP Study refers to "surplus" land capacity for 982 dwellings in the District (SRS46, Table 3.3). However we note that a significant proportion of the Structure Plan allocation and of past delivery within the IPA in Babergh related to one major development area, which is unlikely to be repeated. For Babergh outside the IPA the draft Plan provision is equivalent to 230 dwellings per annum, compared with 290 in the Structure Plan.
- 5.29 We conclude that the Ipswich related element of 600 dwellings is appropriate, but that it should be part of an Ipswich urban area or IPA total which is additional to and separate from the provision for the remainder of Babergh. For the remainder of the District outside the IPA we consider a slightly higher total of 5,000 dwellings, equivalent to 250 per annum would be appropriate. This would in our view better reflect the local needs

of an extensive district with a large number of rural settlements and economic potential for further sustainable development in the market towns of Hadleigh and Sudbury. It should not, however, be so high as to lead to inappropriate and unsustainable development of rural settlements. As noted at paragraph 5.19, we consider an additional breakdown between the Haven Gateway and the rest of the District unnecessary.

- 5.30 For Suffolk Coastal the issue with the Ipswich fringe is that Suffolk Coastal DC would wish to have the flexibility to provide some of the 3,320 additional homes at or close to Felixstowe where it would be better related to the port and other employment. This is seen as more sustainable than commuting to Felixstowe jobs from the edge of Ipswich. We see the force of this: if they can be provided in an acceptable way, homes should be located as close as practicable to the relevant employment. Equally, housing provided in extensions to Ipswich should function as part of the town, and not for commuting to Felixstowe. We have no doubt that as part of the overall growth of Ipswich development of the order proposed in the draft Plan for the Ipswich fringe in Suffolk Coastal could be provided and achieved in an acceptable way. We propose that some 3,200 of the IPA total should be indicated as within Suffolk Coastal, distinguished from the provision for the rest of the district. This should not detract from the options for the rest of the district, where besides the likelihood of an increasingly buoyant market at Felixstowe there are the needs of the other towns and villages within the Haven Gateway and beyond. The RTP study also identified significant additional theoretical capacity. Recognising this, but also the importance of maintaining firm protection of the character of the district's rural areas and coastal heritage, we recommend a modest increase in the "residual" provision for Suffolk Coastal outside the IPA, from 6,780 to 7,000 dwellings between 2001 and 2021. As with Babergh we do not see a need for the Plan to subdivide this provision between the HG and non-HG parts of the District.
- 5.31 Turning to Essex the housing issues are simpler as they relate to whole districts and do not involve cross boundary arguments. The County Council's objections relate to the likely availability of jobs and infrastructure to support the housing growth proposed, both for Colchester and Tendring, rather than to the physical capacity to provide for such growth. On employment, as noted above the proposed targets are challenging, but they are no more so than in many other parts of the region. The Alignment Study shows that the draft Plan would improve the homes/jobs balance for the sub-region (STR31A, STR31B), and there are indications of strong growth prospects for this sub-region. We consider the infrastructure issues below. There appears to be capacity in the sub-region to provide the growth proposed in relatively sustainable and unconstrained locations.
- 5.32 For Colchester, we note the Borough Council's readiness to provide for the level of growth proposed, and the fact that various options for accommodating it are already being actively explored. The RTP Study identifies theoretical capacity for some 2,900 dwellings in excess of the draft Plan requirement, and there are calls from the private sector for increases, particularly to reflect opportunities to the west of the city and at Marks Tey. While these illustrate some of the options that might be available, we note that the advantages claimed for Marks Tey as a location include good connection to the strategic highway network and the London-East Anglia railway, both of which would be conducive to reliance on longer distance travel. Options there would also involve extensive use of greenfield land. We accept CBC's view that to introduce a major new allocation for Marks Tey at this time would be a significant distraction from the urban focus of the current strategy. The proposed provision of 17,100 would already represent a significant increase in delivery. If, in the light of progress in the early period of the strategy there was felt to be scope to extend the growth strategy, the provision for the period beyond 2011 could be increased through the review of the Plan.



- 5.33 For Tending the provision of 8,500 dwellings between 2001 and 2021 (425 per annum average) represents a marginal increase on previous Structure Plan provision (417 per annum) and a slightly greater advance on recent rates of delivery (375 per annum). We find this appropriate to the apparent needs and potential of the district.
- 5.34 In relation to transport the RTP Study picks up some of the key priorities for more sustainable urban transport, particularly in the Colchester Integrated Urban Package and the Ipswich Sustainable Transport Package. By far the bulk of the identified costs (£1.5bn) are for schemes whose main role is to link the Haven Gateway to the region and the nation as a whole. The sub-regional priorities for Haven Gateway are expressed as a list of schemes in Policy HG5, but as elsewhere there is a lack of clarity about their relationship with those in the RTS set out in various parts of Table 8.3, and the output of the regional prioritisation process. We discuss how to resolve these matters in considering the RTS at Chapter 8. For growth in Haven Gateway the strategic priorities in terms of outcomes would appear to be:
- measures to increase sustainable transport in the main urban areas of Colchester and Ipswich, and to ensure that major new developments are linked into the existing urban areas with sustainable access to workplaces, schools, town centres;
  - facilitating freight movement through the sub-region to and from the ports, particularly by rail, and minimising impact on sub-regional and local networks; and
  - resolving capacity and congestion problems on the strategic road network while managing the network to avoid inducing additional traffic growth.
- 5.35 We note the priorities identified by the Newmarket to Felixstowe Corridor Transport Study (TRN98) which address the second and third of the above priorities in relation to the area covered by the study. Otherwise it would appear the proposals listed in HG5 are generally accepted as those necessary.
- 5.36 On implementation of the Plan within the Haven Gateway, the role of the Haven Gateway Partnership (HGP) as the main delivery agency is widely supported. The Partnership's proposed non-statutory "Sub-regional Spatial Framework" raises questions, however, about its relationship with statutory LDDs. As described by EERA it will address sub-region wide issues such as trans-boundary housing and employment allocations, the ports and phasing and delivery of infrastructure (EERA submission for Matter 8C, paragraph 8.2). Care will be needed to strike the right balance between doing this in a decisive way while not in effect circumventing the formal LDD process and its provision for community involvement and SEA. Nevertheless, in principle we see a broadly based partnership approach as appropriate to the needs of this sub-region and we see no reason to propose an alternative arrangement. We note that the local authorities and others are against joint LDDs for matters relating to the ports as proposed in Policy HG4. We agree that this could create unnecessary rigidity and possibly delay and that the sub-regional framework referred to above, and possibly other initiatives through the HGP should enable the issues to be dealt with. Elsewhere our recommended approach to the housing provision for the Ipswich fringe will require cross-boundary co-operation. This will need to take the form of Joint Local Development Documents, unless alternative arrangements offer a better prospect of a firm and early framework for delivery on the Ipswich fringes.

**RECOMMENDATION:**

**R5.3** Delete draft Plan Policies HG1 to HG7 and replace with the following:

**New Policy HG1: Strategy for the sub-region**

The sub-regional strategy aims to achieve transformational development and change throughout the Haven Gateway which will:

- provide for major housing growth at Colchester and Ipswich with the aim of securing throughout the sub-region the earliest possible move to the rates of delivery required to deliver the full provision in Policy H1 by 2021;
- provide for 20,000 net additional dwellings in the Ipswich Policy Area, which will include at least 15,400 within Ipswich, the remainder to be provided on the fringes of Ipswich in Babergh, Mid Suffolk and Suffolk Coastal;
- seek to regenerate the sub-region to address unemployment, deprivation and social issues;
- seek to develop the diverse economy of the sub-region; provide for the needs of an expanding tourism sector both in the urban and rural areas; supporting established and expanding ICT clusters; recognising the potential, and need for local employment growth in the smaller towns of the sub-region; and
- support existing and proposed academic, scientific and research institutions.

**New Policy HG2: Employment generating development**

LDDs will provide an enabling context for not less than 50,000 additional jobs in Haven Gateway distributed as in Policy E2.

The local authorities, supported by regional and local partners, will seek to facilitate these net increases in jobs by promoting a competitive sub-regional business environment through:

- supporting the maintenance and appropriate expansion of the ports, maritime and related activities, recognising the role they play in making the sub-region a major economic growth point;
- promoting the urban areas of Colchester and Ipswich as major centres of employment;
- providing appropriate sites, premises and infrastructure to attract a diverse range of employment to the Strategic Employment Locations of Ipswich, Colchester, Harwich and Clacton;
- major joint regeneration initiatives in East Colchester and St Botolph's, Ipswich Waterfront and Village;
- new Government funded initiatives within Felixstowe and Harwich to address unemployment and deprivation through neighbourhood management and renewal;
- local regeneration initiatives at Felixstowe to address its falling status as a resort, social issues and need to diversify the employment base; and
- other smaller scale regeneration projects throughout the sub-region.

**New Policy HG3: Transport infrastructure**

Key Priorities for transport in the sub-region are:

- measures to increase sustainable transport in the main urban areas of Colchester and Ipswich, and to ensure that major new developments are linked into the existing urban areas with sustainable access to workplaces, schools, town centres;

- facilitating freight movement through the sub-region to and from the ports, particularly by rail, and minimising impact on sub-regional and local networks; and
- resolving capacity and congestion problems on the strategic road network while managing the network to avoid inducing additional traffic growth.

**New Policy HG4: Implementation and delivery**

The Haven Gateway Partnership will work with its partners to ensure that:

- appropriate guidance and co-ordination is available to ensure that local development documents prepared within HG make complementary contributions towards meeting the objectives of the RSS, with joint working where appropriate: and
- the implementation and delivery bodies have appropriate strategies and resources to achieve the objectives in the overall vision for the area at new HG1 and detailed in other new HG policies.

**Note: Policy H1** allocations within the Haven Gateway Sub-Region are:

Babergh*	5,000
Colchester	17,100
Ipswich*	20,000
Suffolk Coastal*	7,000
Tendring	8,500

\*Figures for Babergh and Suffolk Coastal exclude provision within the Ipswich Policy Area on the edge of Ipswich. Figure for Ipswich includes provision in the IPA on the fringes of Ipswich in Babergh, Suffolk Coastal and Mid Suffolk.

Replace supporting paragraphs 5.27 to 5.46 with a shortened version including among other things the following key points:

- explanation of the extent of the sub-region, which should generally be based on whole Districts although it may be practical to subdivide certain districts for monitoring purposes. Inclusion of an Ipswich Policy Area, based on that in the adopted Suffolk Structure Plan;
- explanation of key sectors and other aspects of the economic strategy;
- inclusion of the figures for job increases in draft plan Policy HG2 as reference values for monitoring purposes;
- an indicative breakdown of the Ipswich Policy Area housing provision outside Ipswich between the neighbouring Districts as follows: Babergh approximately 600 dwellings, Mid Suffolk approximately 800, Suffolk Coastal up to 3200. These amounts are in addition to those Districts’ allocations in Policy H1 and will need to be determined through a partnership approach involving Joint Local Development Documents;
- reference to the application of Policy ENV1 ( recommended in **R9.1**) to the sub-region, including the importance of integrated coastal zone management, the Stour and Orwell estuaries and the inland environmental assets (drawing upon Essex CC’s proposed wording for revision of paragraph 5.44); and
- reference to the role of the Haven Gateway Partnership as delivery vehicle for the Sub-Region, and the role and status of the proposed non-statutory sub-regional spatial framework.

## NORWICH SUB-REGION

- 5.37 The draft Plan defines the Norwich Sub-Region (NSR) as including the city and a ring of market towns broadly within 30 minutes drive-time from it, while the Norwich Policy Area (NPA) is stated to include the urban area, the first ring of surrounding villages, and the market town of Wymondham.
- 5.38 The primacy of Norwich as the main centre for much of East Anglia is undisputed. However, there is a distinct lack of consensus (in fact, widespread and varied disagreement, especially among local authorities) about (a) the purpose and usefulness of defining the NSR and NPA and (b) what should be the geographical extent of these two areas. These disagreements are summarised in the panel note for matter 8D and not repeated here.
- 5.39 Draft Plan Policies NSR1-4 focus almost entirely on Greater Norwich. Where they range wider they mainly duplicate issues that can adequately be dealt with in the RTS or Policy E4 (**R6.4**). Although developers and some local authorities sometimes seek further detail about the development emphasis to be placed on one or another of the market towns within the NSR we consider it unnecessary at RSS level to identify key market towns (or priorities between them) as this is a matter for local determination in LDDs. Consequently we find it hard to identify what real strategic policy deficits (defined as the policy areas falling between the generic RSS policies and the proper scope of potential policies in LDDs) either exist or need to be made good by identification of the NSR. On the other hand, the concept of an NPA, generally extending within the bounds proposed by EERA, seems to us to be a useful one because future planning for Greater Norwich as one of the principal regional “key centres” clearly depends on the development of a comprehensive cross-boundary strategy involving South Norfolk and Broadland DCs as well as the City Council.
- 5.40 Under draft Plan Policy NSR4 housing numbers in the NPA would increase by some 29,500 making it perhaps the most concentrated growth pole in the region in terms of absolute numbers. The NEG study (ECN18-22) considers that the Norfolk economy has the potential to grow at a faster rate than assumed in the draft Plan to the extent of 12,400 (29%) more jobs than in draft Plan Policy E2, resulting in a better alignment across the county with the possibility of a modest jobs surplus in the NSR unless labour supply were to increase through higher participation rates, more commuting or additional housing. Our recommendation for draft Plan Policy E2 (**R6.2**) supports this increase. EERA suggests that the NEG study is not a basis for substantially increasing the level of housing proposed in the Norwich area beyond the H1 figures, but the degree of economic buoyancy revealed by the study gives us confidence that provision in the NPA can be modestly increased (+3,500) in line with the City Council’s range of expectations about the greater brownfield potential emerging through the development process. Although CPRE and NNTAG would prefer to use the additional brownfield opportunities to reduce the greenfield growth on the edge of the NPA we consider that the potential of Norwich as a major regional housing and employment growth pole needs to be maximised.
- 5.41 As for location-specificity, paragraph 5.62 of the draft Plan reflects a proposal that had begun to emerge through the Structure Plan (before it was abandoned) for a major urban expansion of about 7,000 dwellings on the north-east sector of the urban fringe, linked to major transport improvements. Norwich and Broadland accept this, but developers press the claims for alternative directions for growth to the north and west of Norwich and in the Wymondham area and generally seek more clarity about the extent of the NPA and the sequential priorities within it. In our view recent developments around some of the city’s urban fringes demonstrate the weaknesses of incremental small-scale

growth onto the “next field”. Bold inter-authority decisions are now necessary about a longer-term growth/transport strategy that can help the NPA to move towards a more sustainable pattern of development in future. We do not consider that there is sufficient sound evidence at present about the environmental capacities and infrastructure requirements of the various possible growth options for the NPA. It is therefore inappropriate, pending further detailed work at the local level, for the RSS to support one growth direction over another. However, to increase flexibility in distributing provision between the City and the two Districts (and achieving deliverability by 2021), we recommend deleting the LPA-specific numbers from the figures for the NPA, leaving this to be determined locally. Additionally, we are somewhat concerned that there is little sign of any emerging joint mechanism for achieving an integrated approach to the planning and delivery of a cohesive core strategy across the NPA. Indeed a certain amount of reluctance was expressed about this by LPAs and developers. Our recommendation (**R5.4**) therefore makes it clear that a strong NPA-wide approach is required to deliver 33,000 dwellings and other associated development in a sustainable form. We have considered concerns about potential delays caused by joint-working but do not see inter-authority working as an excuse for slower progress but as an essential response to the need for the NPA to have a core strategy setting a long-term framework for a step-change in sustainable patterns of development.

- 5.42 The proposed Norwich Northern Distributor Road forms a controversial element of NPA-related infrastructure, seen in the draft Plan as essential to improve the quality of life in residential areas, aid rural regeneration, improve links to strategic employment areas and the airport, and facilitate urban expansion. Some of the case for this road is set out in the Norfolk County Council committee reports (PRT30). In view of the impact of a full route on the Wensum SAC/SSSI Norfolk CC has more recently proposed a partial distributor route which will not need “appropriate assessment” under the Habitats Regulations. This would run from A47 east of the city to A1067 (Fakenham Road) to the north-west, avoiding development of a link to the A47 southern bypass.
- 5.43 The above route was opposed by NNTAG and others on the grounds that it has not been subject to consultation, would be ineffective in its purpose, could bring pressures for completion of a “northern bypass” and would be better replaced by appropriate public transport schemes. Others were more concerned that its completion within the reasonable future cannot be guaranteed and that any development strategy for the NPA should not be too dependent upon it. In our view some form of relief/distributor route to the north of the city is almost certain to form one element among a package of transport measures in a sound core strategy for the NPA and we consider that this scheme should be assessed in this context.

### **North Norfolk**

- 5.44 The District Council seeks an increase in its allocation from 6,400 to at least 8,000 (400pa) which would effectively maintain the rate of provision in the Structure Plan (410pa) and reflect average annual build rates from 1996-2004 (417pa). In its view the North Norfolk market towns are sustainable locations for development and the proposed higher rate of building would help to provide more affordable housing and sustain the local economy. We see no reason not to support this request although it will be necessary through the LDDs to set strong policies to ensure that the growth planned for these relatively remote towns assists in achieving reasonably self-contained and sustainable towns with lively economies and diverse communities.

**RECOMMENDATION:**

**R5.4** Delete Policies NSR1-6. Include a Policy for Norwich as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

**Norwich**

Norwich will be a regional focus for development for housing, employment, retail, leisure, cultural and educational purposes. Particular development aims will be to:

- provide for 33,000 net additional dwellings in the Norwich Policy Area (NPA) in the period 2001-2021 facilitated by joint or coordinated LDDs prepared by Norwich, South Norfolk and Broadland;
- achieve a major shift in emphasis across the NPA towards travel by public transport;
- support and enhance the image of Norwich as a “contemporary medieval city”; and
- promote the city as a destination for tourists and visitors and a gateway to the wider rural and coastal areas of the county and to The Broads.

Planning for employment growth in the NPA will focus on:

- the City Centre (particularly media and creative industries, finance and insurance, and information communication technologies)
- Thorpe St Andrew and Longwater, Costessy (business park use);
- Colney/Cringleford (significant expansion of the research park reserved for research and development, higher education, and hospital/health related uses);
- Norwich Airport (uses benefiting from an airport-related location); and
- Wymondham/A11 corridor (high-tech development and rail-related uses).

Formal local delivery arrangements will be adopted to plan and deliver these aims. The extent of the Norwich Policy Area, based on that of the previous Structure Plan, should be established in LDDs.

**Note: Policy H1** whole District allocations are:

Broadland	12,200
Norwich	14,100
North Norfolk	8,000
South Norfolk	11,200

## GREAT YARMOUTH/LOWESTOFT SUB-REGION

- 5.45 There was a good deal of agreement about the economic and regeneration priorities for this sub-region. It is also generally recognised that environmental assets, including the Broads and the coastal areas are of key importance to the area's economy for tourism and recreation. The EiP heard about Great Yarmouth's candidacy for the new regional casino or a large casino. That will be determined by DCMS on the advice of a special Advisory Panel, in parallel with the process for finalising the RSS. On that basis, and given that the East of England has several other candidates, we have not seen it as the role of the EiP to establish priority for casino development at one particular location within the region rather than another.
- 5.46 Given the consensus about regeneration priorities for Yarmouth and Lowestoft and their development needs, most of the discussion revolved around questions of emphasis, and some participants sought to add to the specific content of the GYL policies in the draft Plan. In our view those policies are already beyond the level of detail necessary or appropriate to a RSS, even as a sub-regional statement. There are, however, particular points of potential conflict between environmental and development needs, particularly on low lying floodplain sites. We have taken account of the points raised as far as is relevant to the condensed version of the Great Yarmouth and Lowestoft strategy which we recommend (**R5.5**).
- 5.47 CPRE and others raised concerns about the amount of housing proposed and its potential effects on the environment of the sub-region. While we would agree that development will need to be carefully planned, we also consider that new housing forms an essential part of the regeneration agenda for Yarmouth and Lowestoft, both by helping to facilitate urban regeneration through mixed developments and through the positive role of the housing market in the economy. We find the level of housing provision for the sub-region and for the two Districts of Great Yarmouth and Waveney acceptable. We doubt, however, whether it is necessary to have draft Plan Policy GYL2 giving a spuriously precise figure of 9,370 additional dwellings, separated into figures for the Great Yarmouth and Lowestoft parts of the sub-region, as opposed to the whole-district provision in draft Plan Policy H1. There does not appear to be any need for cross-boundary flexibility between the provision for Yarmouth and Lowestoft (indeed draft Plan Policy GYL2 does not give any). Nor is there any clear strategic reason to distinguish the "town" provision from the rest within each of the two Districts. This should be a matter for local decision, within the context of the provision in draft Plan Policy H1.
- 5.48 Transport links are seen as vital in improving the sub-region's prospects, but they are also the focus of some of the strongest environmental concerns, most notably the potential impact of dualling the A47 Acle Straight on the internationally important habitat area of the Broads Halvergate Marshes. The RSS is not the place to determine what form any improvement to the A47 link between Norwich and Yarmouth should take – that must follow all the appropriate detailed investigations, including "appropriate assessment" under the Habitats Regulations. Our revised approach to setting out the RTS priorities (**R8.1**) will mean that the Plan will not convey a presumption in favour of dualling or other scheme-specific detail. Nor do we consider it necessary to include all the various other specific proposals listed in draft Plan Policy GYL3, some of which are speculative, until there is further justification.
- 5.49 As regards delivery, matters have moved on since draft Plan Policy GYL4 was drafted, with the formation of the Urban Regeneration Company which is proceeding with work on a master plan. We note that Great Yarmouth and Waveney are pursuing closely aligned approaches to LDDs in their two areas, but that a joint LDD may not be

procedurally the best option, at least for the first LDDs. There is also a need for close co-operation with the Broads Authority and other agencies involved in the sub-region. Against that background draft Plan Policy GYL4 appears to add nothing of substance to the proposals for the Sub-Region. In conclusion, we propose condensing draft Plan Policies GYL1 to GYL4 into a single policy for the two “key centres for development and change”, as we have done with other major locations within the spatial strategy.

## RECOMMENDATION:

**R5.5** Delete Policies GYL1 to GYL4. Include a Policy for Great Yarmouth and Lowestoft as Key Centres for Development and Change in the sub-regional chapter of the RSS as follows:

### Great Yarmouth and Lowestoft

The strategy for Great Yarmouth and Lowestoft is to promote the comprehensive regeneration of the two towns, capitalising on their unique attributes and protecting and enhancing their environmental assets. Local development documents and other strategies will pursue this strategy by:

Promoting radical change in the economy by building on the area's established sectors and key attributes including:

- the renewable energy cluster (utilising existing offshore engineering skills);
- a more diverse tourism cluster, based on the resort and leisure role of the towns and the Sub-Region's coastal environment, wildlife areas and proximity to the Broads;
- environmental technologies and the wider environmental economy. This will be furthered by seeking to establish a research and teaching centre supported by further and higher educational institutions and others to underpin the environmental economy; and
- port and related activities to develop links with the rest of Europe.

Encouraging an urban renaissance in core areas by identifying priority areas and projects for brownfield redevelopment in order to achieve economic, physical and social regeneration in inner urban areas and, in particular, taking advantage of key waterfront sites in both towns. Priority will be given to those regeneration projects that can assist in dealing with concentrations of deprivation within the towns.

Delivering additional housing in line with the provision set out in Policy H1 to support a healthy housing market, assist the regeneration of brownfield sites and meet local affordable housing needs.

Promoting transport improvements on key links into the area, between the towns and within them, with the following key priorities:

- enhanced public transport on strategic links into the towns;
- improved access by road into the towns from Norwich;
- measures to relieve congestion and improve access to regeneration opportunities within the urban areas of Yarmouth and Lowestoft; and
- management and other local measures to improve the conditions for public transport, walking and cycling within the urban areas.

**Note: Policy H1** whole District allocations are:

Great Yarmouth	6,000
Waveney	5,800



## NORFOLK AND SUFFOLK BROADS SUB-AREA

5.50 With regard to the Broads Sub-Area, we appreciate the importance of ensuring that planning for the surrounding areas takes proper account of the statutory purposes and national/regional significance of the Broads area and of its particular environmental requirements and economy. We also share the view of EERA and others that it is inappropriate for the Plan to define the extent of any wider Broads Sub-Area. It should be seen as a “zone of influence” in which objectives for the Broads and issues affecting them may need to be addressed and which extends right into the urban areas of Norwich, and Great Yarmouth, as well as along watercourses at some distance from the area of the Broads themselves. We propose **(R5.6)** that draft Plan Policy NSB1 is replaced by a policy within the Green Infrastructure section of the Spatial Strategy **(R9.1)**, bringing out the strategic role and importance of the Broads area.

### RECOMMENDATION:

**R5.6**

Delete Policy NSB1 in favour of appropriate policy coverage in Policy ENV1 **(R9.1)**

## THETFORD SUB-AREA

- 5.51 We have concluded above that the draft Plan identifies more sub-regions/sub-areas than are justified by any material “strategic policy deficit” and in the process becomes unnecessarily complex. This over-elaboration applies to Norfolk in general and Breckland District in particular, because the latter is split between four geographical sub-divisions. This led the District Council to produce detailed figures showing how the draft Plan Policy H1 allocation would be split between the Thetford Sub-Area, the Norwich and Kings Lynn Sub-Regions and the generic rural policy area. In our view the distribution of new dwellings through the District is generally a matter for local determination through LDDs provided that a clear emphasis on key centres is maintained (SS2) with market towns playing a supporting role (SS9). We therefore consider Breckland here as a single entity.
- 5.52 For a large District in rural East Anglia Breckland’s housing allocation of 15,200 is a substantial one and represents an addition of 4,000 from the original allocation made at a late stage in the draft Plan’s preparation. Some concern was expressed by Norfolk CC and others that EERA’s agreement to this request by the District Council leaves room for “very significant” growth of Breckland’s small market towns. Breckland explained the change as a way of making room for additional development in Thetford without reducing the allocation considered necessary to bring forward affordable housing elsewhere in the District. There was some call from developers for an increased allocation of 2,000 within the District but this was made in the context of enabling the town of Thetford to receive a similar amount of development as that sought by the Council within the total of 15,200.
- 5.53 The draft Plan Policy H1 allocation of 760pa exceeds both the Structure Plan policy rate (610pa) and the average annual completions achieved in 1996-2004 (553pa), although completions have risen to a much higher rate recently (860pa in 2001-2004).
- 5.54 In Breckland’s view Thetford should be more prominent in the draft Plan and, in particular, should be identified as having a dedicated housing allocation of 5,500 in draft Plan Policy TH1. This is not to be lightly considered since it equates (according to the Council) to growth of more than 50% in the total number of dwellings in the town. However, from the information before us there appears to be local support for this (eg from the Town Council and others) and activities such as the application for growth point status and the “Moving Thetford Forward” initiative for the town centre indicate a momentum that could carry the project forward, supported by the views of key landowners around the town as put to the EiP. Bearing in mind the town’s location and improved links, its strong employment role in relation to its size (but a need to make room for diversification), its young age structure (but relatively high social needs), the benefit to the town centre of having a larger local customer base to allow it to achieve a qualitative renaissance and compete more effectively, and the local opportunities for expansion, we consider that Thetford can appropriately assist and benefit from the growth needs of the region. In fact in our view there is a good case for increasing Thetford’s dedicated allocation within the District total to at least 6,000 as this would help to maximise the potential benefits of expanding the town as opposed to spreading expansion too widely among the market towns. As Norfolk suggests, and the figures in the Breckland statement for matter 8D indicate, there is plenty of scope within the remainder of the District’s allocation for substantial growth of these towns in relation to their current size.

**RECOMMENDATION:**

**R5.7** Delete Policy TH1. Include a Policy for Thetford as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

**Thetford**

Thetford will develop as a Key Centre for Development and Change (although on a smaller scale than some of the other Key Centres) building on its role as an employment and service centre, its links to Norwich, Cambridge, Bury St Edmunds and London, and its position as an important gateway to The Brecks. The principal aims to be furthered through the preparation of LDDs will be:

- to increase the number of dwellings in and on the edge of the town by at least 6,000 between 2001 and 2021 through (a) maximising sensitive development within the urban area which respects its historic settings and features and (b) the creation of sustainable urban extensions;
- to facilitate growth of a diversified employment base which will maintain the town’s economic self-containment and reflect its role as a key settlement in the A11 corridor;
- to achieve renaissance of the town centre, securing major improvements in the range and quality of its facilities and townscape while protecting and improving its historic attributes and natural setting; and
- to provide maximum opportunity for travel by non-car modes within the town and to neighbouring Key Centres and market towns.

**Note: Policy H1** whole District allocation is:

Breckland 15,200

## GREATER PETERBOROUGH SUB-REGION

- 5.55 There is a broad consensus about the potential of Peterborough for economic and housing growth, and that there is an opportunity for such growth to be delivered in a sustainable way. Although the growth aspirations for Peterborough are generally supported by neighbouring areas, we also note the concerns of the adjacent parts of Lincolnshire and East Northamptonshire about potential adverse effects of growth at Peterborough. Such concerns seem mainly to relate to the consequences of unbalanced growth of housing and employment. These matters, and broader issues of the linkages and influence of Peterborough across regional boundaries, need to be kept in mind through co-operation and consultation in the LDD process, and in monitoring and review of RSS. We do not consider, however, that they call for any reining back of the growth proposals of the draft Plan or of the vigour with which they are implemented.
- 5.56 Both Huntingdonshire and Fenland, as well as some development sector participants, sought greater clarity over sub-regional boundaries and the split of each district's housing provision between the Greater Peterborough Sub-Region and Cambridge Sub-Region, and Cambridgeshire CC agreed that there needed to be some rationalisation of the boundaries. It is clear that both Districts are partly within the influence of both Peterborough and Cambridge, and will need to take account of both in their LDDs. Although some cross-boundary issues with Peterborough City arise, the overall distribution of housing provision to different parts of these two Districts should be a matter for LDDs. Generally we find that the housing market, economic and other interactions between Peterborough and the neighbouring rural areas and market towns do not appear to require a separate sub-regional planning strategy in the same way as those for Cambridge and its hinterland. It will be for the Local Planning Authorities for the rural areas to adopt appropriate policies in their LDDs in the light of the overall guidance in the RSS spatial strategy and generic policies.
- 5.57 The report by Shared Intelligence (ECN13A) for Peterborough City Council and EEDA argues the case that Peterborough could sustain higher growth than the draft Plan's proposed targets of 17,400 jobs and 21,200 homes for Peterborough. It concludes that 25,000-34,400 additional jobs could be achievable, which would require an additional 30,000-41,300 homes to be built. Although these figures are substantially above past rates, we note that recent signs are of considerable buoyancy, both in job growth and demand for new housing. The City Council, while arguing that the draft Plan targets are readily achievable, and aspiring to exceed them, favours expressing the targets as "at least....", rather than setting them higher. Although there is much support for this, there are concerns from neighbouring authorities and others about the implications of regarding the targets as a "floor rather than a ceiling". Despite the degree of support for the growth role of Peterborough, FOE pointed to current weaknesses in the sub-area's economic profile, and were sceptical that sustainable development would be achieved. While there are challenges to be overcome, for example in increasing educational and skills achievement and attracting more high grade jobs to the city, we conclude that the momentum and commitment, and relatively unconstrained development opportunities, are there to bring about higher growth.
- 5.58 We note that the SI report scenarios are "theoretically achievable development options" needing to be assessed in detail from the capacity point of view, especially housing land, before they are agreed by the Council, residents, local businesses and external stakeholders. On this basis we understand why the City Council prefers to take the draft Plan proposals as a minimum but seek to achieve higher growth. We doubt, however, whether the "at least" formula sufficiently reflects the opportunities for growth, and consider that there is a case for setting more challenging targets. This would give

greater clarity about what is being aimed for and help to focus attention and resources on providing for additional growth. We therefore conclude that both the draft Plan H1 housing provision figure for Peterborough City and the employment aspiration should be increased, to 25,000 additional dwellings and 20,000 additional jobs, in the period 2001-2021. These are somewhat below the range put forward in the Shared Intelligence report but in our view the assumptions behind that report's figures are rather optimistic. In any case, it is unlikely to be practicable to complete any higher provision before 2021, since our recommendations (**R5.8**) remain challenging and will require concerted and sustained effort in delivery.

- 5.59 In pursuing these higher targets it is important that development is carried out in line with the principles of the strengthened RSS Spatial Strategy and accompanied by sufficient Growth Area and other investment to provide the necessary supporting infrastructure. Strong delivery arrangements will be needed to achieve the level of growth proposed. Although there is a supply of relatively unconstrained land this does not mean the sub-region is free of environmental constraints. The Environment Agency has drawn attention to the importance of flood risk, and we endorse the need for LDDs to take full account of Strategic Flood Risk Assessments. While Peterborough is achieving a very high proportion of its current development on brownfield sites, and some further PDL will be available, a higher level of growth will inevitably mean a significant proportion of greenfield land also being used. This needs to be accompanied by a positive approach to conserving important landscapes and environmental assets and where possible achieving environmental gains, particularly through green infrastructure provision within and around the urban areas.
- 5.60 For the longer term, depending on progress in the first five years, there may well be scope for Peterborough to play an even greater regional growth role, realising more of the potential suggested in the SI report for growth from 2021 to 2031. To do so would involve finding satisfactory solutions to the environmental issues indicated above, and also to any wider water resource and other potential constraints. These matters should be explored in parallel with delivering the higher growth already proposed, with the aim of informing the first review of the RSS. Accordingly additional regional growth at Peterborough is one of the spatial options that we suggest should be considered as part of that review.
- 5.61 Outside Peterborough there were calls for more attention to be given to the growth needs and possibilities of the market towns and smaller settlements. It was argued, for example that March and Wisbech as market towns have further scope for growth, and that small towns such as Whittlesey and Ramsey will suffer economic decline without more development. For Fenland District, the draft Plan allocation of 10,100 dwellings would mean an annual provision slightly above the adopted Structure Plan, although it would represent a slight reduction against recent build rates. Given the commercial influence of the market towns, which have extensive catchment areas, we conclude that a modest increase to 11,000 dwellings for Fenland would be appropriate. Implementation of this provision will need to be planned with care to observe flood risk constraints, and to ensure that it is matched by the necessary infrastructure and provides housing development which supports the local economy rather than extended commuting.

**RECOMMENDATION:**

**R5.8** Delete Policies GPSR1 to GPSR4. Include a Policy for Peterborough as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

**Strategy for Peterborough**

Within Peterborough, the strategy is for growth and regeneration to strengthen Peterborough's role as a major regional centre and focus of the northern part of the London-Stansted-Cambridge-Peterborough Growth Area. Policies will seek to achieve an increase of at least 20,000 additional jobs in the period 2001-2021 together with strong housing growth, sustainable transport improvements and provision of social, community and green infrastructure. These policies will include:

- within the City of Peterborough, development and regeneration of the city centre to create an improved range of services and facilities including retailing, housing, leisure, cultural and green infrastructure provision, and the regeneration of inner urban areas;
- delivery of a significant and sustained increase in housing to implement the provision in Policy H1 of 25,000 additional dwellings for Peterborough UA between 2001 and 2021;
- seeking to attract investment in sectors of the economy that have particular scope for expansion such as further development of knowledge based sectors, public administration, retail and leisure services and environmental clusters;
- improving access to locally based further and higher education facilities through a strategy to establish and expand the provision of higher education and work towards the provision of a university;
- achieving within Peterborough city an increase in the use of public transport, walking and cycling and a reduction in car use; and
- improving transport choice between Peterborough and the rural areas.

**Note: Policy H1** to show a net dwelling increase of 25,000 for Peterborough UA and 11,000 for Fenland District.

The supporting text, based on a much reduced version of draft Plan paragraphs 5.88 to 5.103, should contain the following key points:

- a reference to the Peterborough Sub-Region's influence and linkages across regional boundaries with the East Midlands and the Milton Keynes South Midlands Growth Area. Co-operation is required across regional boundaries to ensure compatibility of policies in LDDs and co-ordinated monitoring;
- reference to the importance of the new City Centre Framework for Peterborough and the role of the Urban Regeneration Company; and
- reference to the need for LDDs to pay specific regard to Strategic Flood Risk Assessments for Peterborough and Fenland.

## CAMBRIDGE SUB-REGION

- 5.62 Draft Plan Policies CSR1 to CSR5 are heavily based on the Cambridge Sub-Region policies in the Cambridgeshire & Peterborough Structure Plan 2003 (LPA7). This reversed long-established policies of dispersing growth pressures away from the city towards a wide ring of market towns within and just outside the county. Instead, much more emphasis is placed on urban extensions to the city on land released from the Green Belt, together with the planned new settlement of Northstowe. The draft Plan extends the housing provision in the sub-region for a further five years, continuing the Structure Plan rates for individual Districts. However, there were claims that the strategy should be more positive about (a) embracing the opportunities presented by the economic dynamism of the Cambridge area and its potential to act as a national economic driver in the field of higher education and knowledge-based employment and (b) assisting the aims of the SCP and the Barker review by providing the additional “Rooker 18,000 dwellings” and taking up the option recognised in RPG6 for another new settlement to be brought forward through the RSS to meet post-2016 needs.
- 5.63 The TCPA offered the widest challenge to this approach, arguing for a longer-term (30 year) framework for the sub-region. In their view sites need to be identified for two major new settlements, both capable of growing to towns of 25,000 homes which can act as large counter-weights to the city, one located to the south of Cambridge serving the “basic science” sector and one to the north serving the “applied sciences”. Developers put forward a number of more specific proposals for new developments (usually on a smaller scale) and there were also suggestions for expansion of the presently planned capacities of Northstowe and the developing new settlement at Cambourne.
- 5.64 On the other hand EERA and the local authorities consider that the identified housing land supply in the sub-region is at the limit of what is achievable without damage to quality of life or exceeding the scope of existing and planned infrastructure. In their view the suggestions for further locations are unnecessary, unsustainable and damaging to the strategy. Most are greenfield areas only recently considered and rejected by the Structure Plan panel. It is already the case that the CSR Strategy is likely to achieve less than 60% of brownfield development, which is the overall regional aim. The authorities stress that positive planning for delivery of the housing allocations made in the Structure Plan is now under way through the Cambridge Local Plan and associated local plans/DPDs and that things are now moving into an implementation phase, assisted by the work of Cambridgeshire Horizons in co-ordinating infrastructure provision.
- 5.65 From the information summarised in EERA’s statement on matter 8G it appears that the potential supply of identified land in and on the edge of the city of Cambridge after the Green Belt reviews will exceed the number implied by the draft Plan Policy H1 allocations for Cambridge and South Cambridgeshire by over 4,000 and that additional capacity of about 7,300 has been identified which is unlikely to be available pre-2021. On that basis the draft Plan already contains some shorter and longer-term flexibility in terms of extension of the Cambridge urban area.
- 5.66 However, the option of a second “new town” is recognised in both RPG6 and the SP as the next most sustainable growth choice once other capacity is exhausted. Some suggest that another benefit of exercising that option now would be to relieve the current pressure placed on the lowest, and suggested least sustainable, sequential tier of the settlement hierarchy in draft Plan Policies CSR1 and 2 - the market towns and key rural centres - to which about 50% of the sub-regional housing allocation is assigned, while leaving undisturbed the higher-tier elements of the inherited SP strategy. It is at

first surprising that as many as 30,000 dwellings are allocated to the Cambridgeshire market towns and key rural service centres. However, much of this provision reflects the extent of existing completions and commitments stemming from the earlier dispersal strategy. These are likely to have to run their course, although as-yet unidentified housing sites will need to be concentrated on the larger more accessible centres in accordance with SS9. While a number of developers would like the RSS to identify particular market towns for enhanced roles we do not find any current regional imperatives or sub-regional policy deficits requiring to be filled in that respect. In our view it is more important for the sub-regional policy to place the emphasis on making the market towns more self-sustaining rather than further extending their dormitory roles.

- 5.67 Referring briefly to the out-of-county market towns defined as within the CSR (Haverhill, Newmarket, Royston and Saffron Walden), draft Plan Policy CSR2 is inconsistent about the way these are treated in that it includes a small combined allocation for the two Suffolk towns but makes no mention of Royston (Herts) and Saffron Walden (Essex). It does not appear that inclusion of any of these out-of-county towns in the CSR implies a higher level of development than would otherwise be the case and indeed the draft Plan Policy CSR2 allocations for the Suffolk towns appear to consist largely of commitments. Although EERA suggested that references to Royston and Saffron Walden could be introduced to deal with this point, we tend to agree with Essex and Herts CCs (who saw no reason to include these towns in the CSR). In our view the association of these four out-of-county towns with Cambridge in planning policy terms looks backwards towards the old housing dispersal policy, when the market towns ringing the city were seen as recipients of growth that could not be catered for within or adjoining it. Cambridge no doubt continues to exert some strong influences on these towns which need to be addressed in various ways. However, in our view projecting the CSR across three county boundaries makes the draft Plan unnecessarily complex in relation to the scale of the issues involved and does not fill any meaningful strategic policy deficit. We therefore favour omitting reference to the Suffolk towns rather than including allowances for Royston and Saffron Walden.
- 5.68 Delivery in the CSR (at average 2,073pa in 1996-04) has been considerably lower than the rates that would be required to meet the SP/RSS (average 2,905pa). However, in our view there is now a good range of housing delivery locations coming out of the SP and the LPs/DPDs, supported by Cambridgeshire Horizons. We therefore generally agree with the view that the area is moving towards a position in which house-completion rates could rise by up to 40% over coming years. As a higher proportion of the development would be occurring in or close to the city than in the past this would help to bring housing and employment more into line. At paragraph 5.61 above we have concluded that a modest increase to the allocation for Fenland would be appropriate. Other than that we find no compelling evidence to support any particular addition for the CSR Districts. However, progress in meeting the draft Plan Policy H1 provision will need careful monitoring because there is uncertainty about how quickly some sites will progress before 2021 (eg CNF East, Northstowe and Marshalls) and action may need to be taken to replace or supplement them if progress is slow.
- 5.69 Even more importantly, we agree with the TCPA and others that the national and regional importance of the CSR makes it necessary to provide a longer-term framework to guide its development, looking well beyond 2021. However, we do not think it feasible to put that framework in place now: it will need to be a central aspect of the next review of the RSS which (on the timetable suggested by EERA at the end of the EiP) will need to be in place by 2010/2011. There will clearly be many options to be considered during that process and some of these have been extensively studied. The



Buchanan study, for example, identifies various corridors where potential locations exist, extending well beyond the CSR as we have defined it. We certainly do not purport to provide a comprehensive list (or endorse any of the following candidates), but from what we have heard we would expect the list of possible candidates within the CSR to include:

- major expansion of Huntingdon as a new “key centre for growth” on the East Coast Main Line/A14 and with links to Cambridge by extension of the guided busway. (Possibly to include expansion onto brownfield land at Alconbury Airfield and/or Wyton Airfield);
- further growth at Northstowe, noting that the CSR study (SRS9) considered that it would be a “decisive weakness” if the capacity were less than 10,000;
- further growth at Cambourne, noting comments made by the SP panel that “there is a strong case for re-examining the scale of growth planned”, although in our view this would have to be contingent on a much better level of public transport accessibility;
- further new or expanded settlements along the line of the guided busway or future extensions to it; and
- an expanded settlement somewhere to the south of Cambridge associated with the railway and/or extensions to the guided busway.

5.70 In drafting our recommended revision of the CSR policies we have agreed with EERA’s suggestion that there would be presentational benefit in including the gist of the sub-regional vision from the Structure Plan. We have therefore generally combined the SP vision (**R5.9**) with the content of draft Plan Policies CSR1 and CSR2, omitting the development quantities in CSR2 (since they are not necessarily consistent with current land supply data) and to give more flexibility.

5.71 Turning to the employment policies, our recommendation for draft Plan Policy CSR4 reflects agreement with the City and the University who both feel that CSR4 represents an over-simplification of Structure Plan policy P9/7 on the selective management of employment development in and close to Cambridge. We have also agreed with EEDA who consider it unclear what is meant by “close to Cambridge”. It was suggested that this definition could apply to the whole of South Cambridgeshire although parts of that District are further from the city than some places in other Districts. We have retained a simplified version of draft Plan Policy CSR3, although we consider that the list of particular technologies should be indicative and included in the supporting text. We have also included a reference to employment development in the market towns, recognising the importance of making them more self-supporting with a wider and more diverse employment base. Cambridge University called for the areas identified in SP Policy P9/2c to be taken forward in the CSR policies to avoid a policy vacuum between lapsing of the saved policy and adoption of relevant LDDs. However, we are not convinced of the necessity for this.

5.72 Draft Plan Policy CSR1 contains a final paragraph referring rather obliquely to the possible housing consequences of employment which may be generated by the re-use of Alconbury Airfield, presumably as a result of implementing the permitted use for rail-related warehousing. Huntingdon DC was concerned that this policy appears to imply that such provision would be additional to the District’s draft H1 allocation, while the site owner (ADL) sought positive identification of the airfield for mixed use brownfield development of warehousing and at least 3,000 dwellings.

- 5.73 Peterborough City Council put forward an alternative scenario for Alconbury on the grounds that the planning permission will not be implemented because of the costs associated with constructing a rail link to the East Coast Main Line. However, the Council's suggestion for developing the site as a freight/passenger airport found no support from other participants, nor from the background work to the ATWP, and we were told by the representative of Marshalls that they are no longer considering Alconbury as an option for relocation. In the circumstances we can find no reason for the Plan to include any form of safeguarding policy for the airfield runway.
- 5.74 We understand the doubt about the implementation of the existing permission and without other options the future of Alconbury remains rather uncertain. However, we are not convinced that this is the right time for the Plan to prescribe an alternative course for this substantial area. We realise that development took place at a significant rate in Huntingdon District in the period 1991-2001 (820pa) and that the draft Plan follows the Structure Plan in planning for a reduced rate (560pa). However, as we have commented earlier, the Structure Plan was founded on a decision to rein back the policy of aggressive dispersal from Cambridge and the ADL proposal would run counter to that.
- 5.75 As we comment elsewhere this is one of a number of possible candidate locations for future development. We conclude that the solution for Alconbury needs to emerge from full consideration of all the relevant issues and should be reflected in the first review of the RSS. In the meantime our recommendation for the Cambridge sub-region deletes the final paragraph of CSR1.
- 5.76 On the Green Belt, there is general agreement that the particular purposes of the Cambridge Green Belt, as defined in the Structure Plan, should be taken forward into the RSS. We recommend accordingly. As to the extent of the Green Belt, some developers argue that the door should be left open to further review through LDDs but it will be apparent from the above that we find no current strategic case for review beyond the areas defined for release in SP Policy P9/2c. However, the issue may need to be revisited during a more fundamental reappraisal of the CSR strategy looking forward to 2031 in the first review of the RSS.
- 5.77 Finally, on draft Plan Policy CSR5, in our view this policy would be better replaced with a statement in the supporting text about the role and function of Cambridgeshire Horizons.

#### **RECOMMENDATION:**

**R5.9** Delete Policies CSR1-CSR5 and replace with the following:

##### **New Policy CSR1: Strategy for the sub-region**

The vision for the Cambridge Sub-Region during the period to 2021 and beyond is that it will continue to develop as a centre of excellence and world leader in the fields of higher education and research, and will foster dynamism, prosperity and further expansion of the knowledge-based economy spreading outwards from Cambridge. At the same time the historic character and setting of Cambridge as a compact city will be protected and enhanced, together with the character and setting of the market towns and other settlements and the important environmental qualities of the surrounding area.

A comprehensive approach will be adopted to secure the necessary infrastructure provision (including green infrastructure) to support the development strategy for the sub-region.

LDDs will make provision for development in the sub-region focused on making the most of the development potential of land:

- in the built-up area of Cambridge, subject to considerations of environmental capacity;
- on the periphery of the built-up area of Cambridge, on land released from the Green Belt following the Structure Plan (2003) and through the Cambridge Local Plan and LDDs prepared by the local planning authorities;
- at the new settlement of Northstowe, linked to the guided busway; and
- on land within or on the peripheries of the Cambridgeshire market towns and within key service centres (or on the peripheries of key service centres, mainly limited to existing commitments), where such development would contribute to the social and economic needs of the community and good public transport exists or can be provided.

### **New Policy CSR2: Employment-generating development**

Employment land in and close to Cambridge (within boundaries to be defined in local plans/local development documents) will be reserved for development which can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success of the sub-region as a centre of high technology and research. Employment-related development proposals must demonstrate that they fall into one or more of the following categories:

- a) high technology and related industries and services concerned primarily with research and development including development of D1 educational uses and associated sui generis research institutes, which can show a special need to be located close to the Universities or other established research facilities or associated services in the Cambridge area;
- b) other small-scale industries which would contribute to a greater range of local employment opportunities, especially where this takes advantage of, or contributes to the development of, particular locally based skills and expertise;
- c) the provision of office or other development providing an essential service for Cambridge as a local or Sub-Regional centre.

Specific provision will be made throughout the sub-region for the development and expansion of high-technology clusters.

In the market towns LDDs and other implementation programmes will identify land for employment development where this will improve the local balance of jobs and homes and diversify and improve the economies of the towns.

### **New Policy CSR3: Green Belt**

In making provision for housing, employment and all other development a green belt will be maintained around Cambridge to define the extent of urban growth in accordance with the particular purposes of the Cambridge Green Belt which are to:

- preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- maintain and enhance the quality of its setting; and
- prevent communities in the environs of Cambridge from merging into one another and with the city.

### **New Policy CSR4: Transport infrastructure**

The objectives of the Regional Transport Strategy will be progressed by strengthening the public transport system and connections within the Cambridge Sub-Region, including possible extension of the guided busway system and by implementing, monitoring, and subsequently acting appropriately upon the planned experimental demand management measures.

**Note: Policy H1** allocations within the Cambridgeshire Sub-Region are:

Cambridge	19,000
East Cambs	8,600
Hunts	11,200
South Cambs	23,500

Supporting text

Changes to be made to reflect the above and refer to (a) the role of Cambridgeshire Horizons and (b) an indicative list of types of cluster development. Include a definition of the Cambridge Sub-Region.

## STANSTED/ M11 SUB-REGION

### Characteristics and role of the Sub-Region

- 5.78 Within the sub-region the two principal economic foci are Stansted Airport in the northern part and Harlow in the southern part. The third economic focus is London, both as a destination for commuting to central London and through more complex local linkages between the Lee Valley towns in the southern part of the sub-region and the neighbouring parts of north east London. Although the Cambridge Sub-Region is also a major influence to the north, its importance for this sub-region as a source of economic growth or direct employment is debatable.
- 5.79 The urban structure is varied, from the London fringe areas in the south to the sparsely settled countryside of East Herts and North Essex beyond Stansted. Harlow New Town is the only major urban concentration. The sub-region possesses regionally important environmental assets including Epping Forest, Hatfield Forest and the Lee Valley Regional Park as well as extensive tracts of farmland. There is also an important and varied built heritage comprising the historic fabric of older settlements, including a very large number of listed buildings in Uttlesford district as well as the planned New Town of Harlow.
- 5.80 As its title implies the sub-region is characterised by the movement corridor formed by the M11 and the West Anglia main line, both of which link London, Harlow, Bishop's Stortford, Stansted and Cambridge. However south of Harlow the railway forms part of the separate radial movement corridor of the Lee Valley including the A10. From east to west the sub-region is traversed only by highways, M25 in the south, in the middle the A414 from Chelmsford through Harlow to Hertford and further north the A120.

### Agenda for the sub-region

- 5.81 Against the above background, and in the light of the discussion of Matter 8H, the main agenda for the sub-region would appear to be:
- to secure a major addition of housing as part of the SCP growth agenda;
  - to accommodate the development needs associated with Stansted Airport;
  - to provide employment growth to match the housing increase, exploiting the growth of Stansted;
  - to exploit the sub-region's links with outer London, the Olympic sites and Stratford in a mutually beneficial way;
  - to secure urban and economic/social regeneration at Harlow;
  - to rationalise and improve the sustainability of the Lee Valley settlements;
  - to protect and promote the key green infrastructure assets and the rural character of much of the sub-region;
  - to maintain the role of the Green Belt; and
  - to resolve movement and infrastructure problems for Harlow and for rail commuting.
- 5.82 This is a long and wide ranging agenda, reflecting the central position and disparate nature of the sub-region. We consider that the strategy reflected in the draft Plan successfully brings together many of these issues. The focus on Harlow as a growth point is sound as it enables growth to complement regeneration, and to build upon and enhance the town's sub-regional status. Given the uncertainty surrounding the scale and likely timing of job growth and housing needs associated with the expansion of Stansted

(discussed further at paragraphs 5.99-5.103 below), we would not favour calls for the balance to be shifted towards more growth close to the airport, at least in the short term. There is currently no natural urban focus for major regional growth there, while there is both the foundation and the need for such growth at Harlow. In line with the approach we have taken to the Spatial Strategy as a whole, we do not consider there is a need for an extensive sub-regional strategy for the whole Stansted/M11 area as set out in Policies ST1 to ST7 of the draft Plan. As the major focus for growth we propose that Harlow is dealt with as a “regional growth point”, while the guidance we consider necessary in relation to Stansted Airport is contained in the revised version of Policy E14 which we recommend at **R6.13**.

### **Harlow and North Weald**

- 5.83 For Harlow itself there are important questions about whether the proposed strategy is sound in terms of the scale and locations for growth and in providing for sustainable and deliverable development, especially over the longer term. The original Gibberd Plan for Harlow is much revered, both for the layout with green wedges which separate the urban development and for the way in which the town was designed to be contained by the landscape. The principles of Gibberd’s Plan remain relevant, but inevitably mean that there are limited options for extending the town without running up against serious landscape constraints. The east side is generally accepted to be the least constrained direction for growth. To the south the landscape setting is defined by a prominent ridge. This limits the extent to which Harlow could extend southwards, although opinions differ about how much capacity would be possible with or without appropriate landscaping. To the south west and west the immediate fringe of Harlow is less well defined. There is a strong argument for the need to maintain spatial and visual separation from Roydon and Nazeing and the lower lying land towards the Lee Valley but there are areas of PDL close to the urban edge of Harlow that contribute little to this separation. What is needed is a comprehensive local strategy for a mix of development, landscaping and greenspace that will define better and more enduring boundaries in this area. To the north the Stort Valley and the floodplain define the boundary to the town, and any major growth would need to be beyond this on the northern slopes of the valley.
- 5.84 Any growth options also have to contend with the transport problems which Harlow currently faces. The original structure and circulation system of the new town is ill adapted to today’s traffic, and the strategic road system has evolved quite differently from that envisaged in the Gibberd master plan. The West Anglia railway, although providing important links to London, Stansted and Cambridge, is recognised as being under pressure on capacity and is identified as a high priority in the Regional Planning Assessment for the Railway (TRN97, page 108).
- 5.85 Any future expansion of Harlow is also complicated by the fact that the town is tightly bounded by its administrative borders, and growth other than within the town or to the east would involve either Epping Forest or East Hertfordshire councils, both of which are hostile to any expansion of Harlow on their territory.
- 5.86 The options for growth in and around Harlow have been the subject of a number of studies (eg documents SRS6, SRS10, SRS16, TRN29, and TRN29A-J). There is a general perception, which we share, that Harlow has a need for significant additional housing, and that growth is required to support regeneration priorities for the town. Opinions differ, however, about whether the 20,700 additional homes proposed (together with a further 6,000 at North Weald) will support or hinder regeneration. The arguments relate as much to the form and location of development as to its quantity. There is evidence for the general proposition that in principle the more growth there is the greater the prospect that it will support increases in local employment, an expanding

- role for the town centre, the provision of infrastructure and resources for economic regeneration. However, for all that to happen there is in our view a need for the growth to be of such a form, and carried out in such a way, as to ensure that it is part of the town and does not acquire a separate identity and momentum which could undermine the progress of the town itself. This we would take to be part of the definition of a sustainable urban extension.
- 5.87 Turning to the draft Plan’s proposals, paragraph 5.136 refers to development within and to the east of Harlow to provide 8,000 dwellings and “some more limited development” to the south and west of Harlow, assumed to be 2,700 dwellings. The key growth proposals are major urban extensions to the north to provide for about 10,000 dwellings. To this must be added the proposal for 6,000 dwellings at North Weald. Both the Harlow north and North Weald proposals also involve strategic employment growth. These two major proposals are trenchantly opposed not only by the local authorities in whose areas they fall, but also by very substantial local residents’ movements. Developer/landowner participants, other than those with a direct interest in the proposals concerned, have raised doubts about whether they can deliver sufficient housing at an early stage, and call for growth to be spread among a greater number of locations, both at Harlow and other parts of the sub-region.
- 5.88 While Herts CC firmly opposes the Harlow north proposal, Essex CC accepts it and the North Weald proposal as the “least worst” options, and Harlow Council supports them. Apart from the general benefits of growth in meeting housing and other development needs, one of the main advantages claimed for these proposals is in the delivery of transport improvements. Both would assist the creation of a new High Quality Public Transport (HQPT) “spine” linking Epping, North Weald, Harlow, Harlow North and Stansted. However, opponents of the proposals point out that such a spine is only rendered necessary by the proposals themselves and their location detached from the town of Harlow. Improvements to public transport, walking and cycling are certainly needed, but it is arguable that solutions could be delivered in tandem with regeneration and development elsewhere at Harlow.
- 5.89 A further advantage of growth to the north is seen to be that it would facilitate the creation of a northern by-pass relieving the A414 through the town and providing a new access to the M11. This is supported by ECC and, like the HQPT spine, is regarded as a prerequisite to accepting the development. The road proposal is, however, highly controversial in itself and at this stage is far from guaranteed. The Highways Agency has reservations about creating an additional motorway access, and suggests that alternative means of resolving peak hour congestion on the network in Harlow be considered. HCC and others have also argued in favour of a southern by-pass, but that too would be fraught with landscape and other objections. There is clearly no easy answer to the highway issues surrounding Harlow. While that in itself is not a reason for failing to find a solution, we find that the choice of a northern route (or a southern one) has not so far been sufficiently demonstrated to be acceptable or deliverable for the Plan to be made dependent upon it. In fact this is recognised in the draft Plan itself as the RTS shows the proposal as being of only third priority and status “proposed for investigation” (draft Plan Table 8.3/I page 169). The time period of 2006-10 for the scheme also now appears highly unlikely.
- 5.90 Looking more specifically at the Harlow north proposal, a number of participants argue that it was included in the draft Plan at a fairly late stage in the process, for reasons which are not entirely clear. It was favoured by the Robin Thompson study (SRS7, RPG14 Strategy Review), but prior to that the growth studies, and the “banked draft” RPG14 had considered urban extensions (albeit of a lesser scale) to the east, south and west of Harlow. It may be that reaction against those proposals influenced the decision

to set aside the landscape and other considerations which had previously been taken to rule out development to the north. One merit claimed for the northern option is that it rectifies the asymmetric layout of Harlow in which the town centre and railway station lie at the northern edge of the town. It is argued that development to the north would have closer access to the town centre and railway than other directions which would tend to spread the town further away from them. Another argument in favour of the north is that there is a large area of land in single ownership which could ensure delivery of major growth. Although it is inappropriate for us to enter into the merits of specific development proposals, we note that the landowner/developer Ropemaker has put forward some detail of its proposals. The landscape barrier of the Stort Valley would be turned to advantage as a piece of strategic green infrastructure separating the urban extension from the town, but traversed by a so called “living bridge”, and biodiversity would be integrated into the development. It is also argued that the development can be designed to minimise environmental impact by reducing water use, minimising carbon emissions, sustainable waste management and transport.

- 5.91 As SHN and others argued, some of the merits claimed for the Ropemaker proposals are not exclusive to the Harlow north location, and in some respects the nature of the proposals reinforces scepticism about what the development would contribute to the town of Harlow and its regeneration. As well as being physically separate from the rest of the town, and beyond reasonable local walking distance, Harlow north would have its own direct connection to the M11 via the proposed northern by-pass. At 10,000 dwellings the development would be of such a size as to support many of its own jobs, shops, schools and other services, which would not be readily accessible from other parts of Harlow. The impression that a separate town would be created is strengthened by indications that it would be regarded as the first stage of a development up to 25,000 homes, although we note that neither EERA nor Harlow DC support growth beyond 10,000.
- 5.92 Looking at North Weald, some of the same arguments apply. As noted above, the separateness of the location from Harlow means that development would be crucially dependent on the HQPT spine to connect the jobs it would provide with the workforce of the town, and to bring inhabitants of the new housing to the town centre and other facilities in Harlow. Even so, links southwards to Epping, London and further afield via the M11 and M25 would form a significant counter attraction. This raises serious questions about whether HQPT would be viable or effective in making North Weald part of Harlow. One distinguishing feature for North Weald is that the airfield would form a major previously developed site, although the full proposals being promoted by developers Lend Lease also involve significant greenfield land. The airfield is currently in use, however, and a persuasive case was made for its retention for general and business aviation and on account of its heritage value.
- 5.93 We consider at Chapter 9 concerns that remain unresolved about water supply and wastewater treatment to serve the strategic development proposed in the Plan. These concerns apply both to Harlow north and North Weald, although the local circumstances are not identical. Nor are the concerns about water supply and wastewater treatment confined to these locations, as any development within the sub-region of a comparable scale will require solutions to the same difficulties. Our recommendation on the way forward on the strategic water cycle issues is given at **R9.9**.
- 5.94 In conclusion we recognise that the proposals at Harlow north and North Weald would be capable of producing a large amount of additional housing in due course, as well as jobs and supporting infrastructure. However, in view of the need to invest in the HQPT and resolve the strategic water cycle issues we would not see either location making a major contribution until the latter half of the Plan period. Even then, and assuming



water cycle and transport issues could be resolved, there are also objections on landscape and other environmental grounds, particularly for Harlow north, and there remain questions about whether the dynamism of relatively self-contained development at both locations could be made to support the functioning and regeneration of Harlow. The proposed strategy, in relying on “satellite” settlements rather than urban extensions integrated with the town, runs the risk that these will function as rival attractions in terms of the housing market and economic activity.

- 5.95 We therefore conclude that the strategy should refocus on the opportunities within Harlow and other directions of growth to the east, south and west of the town, reflecting the conclusions of the Growth Area Study (SRS10 paragraph 11.6.21) and the proposals originally contained in the “banked draft” RPG14. Although this also means a reduction in the overall housing provision allocated to this part of the sub-region, we do not consider it should impair the achievement of an early gain in housing output. On the contrary, we would see a strategy concentrating on a number of directions for growth, while avoiding the distractions of planning for major “satellite” settlements as capable of producing early progress in development and securing gains for regeneration within the town.
- 5.96 It is important not to overlook the fact that other options for growth at Harlow are also the subject of strong local objection, primarily on landscape and environmental grounds. We were impressed by the submissions of Harlow Civic Society (HCS) about the options for locating development at Harlow, although we consider that settling the precise amount of development provided in each direction should be a matter for the LDD process. There will undoubtedly be some opportunities for housing gains within the town centre and other parts of the existing built up area. Beyond that the largest and least constrained options are to the east, where there is opportunity for employment, as well as housing development for which there would appear to be capacity for more than the 3,000 dwellings envisaged in the draft Plan. To the west we note that there have been proposals to complement earlier neighbourhood developments by crossing the former Development Corporation boundary. While mindful of the landscape and other considerations noted in paragraph 5.83 above, we consider that some development in these directions should be provided.
- 5.97 The strategy for Harlow needs to include key elements of housing and employment provision, regeneration, transport priorities and the network of multi-function greenspace. We consider that this can be done at a sufficient level of detail for RSS in a much more concise form than draft Plan policies ST1 to ST7 and paragraphs 5.121 to 5.149. Our recommendation **R5.10** sets out the provisions which we believe to be necessary for Harlow as a growth town within the regional strategy. Much of the detail is already being put in place with support from initiatives such as the Harlow Regeneration Strategy (ECN23-26) and the Green Infrastructure Plan (ENV27, 27A, 27B). In relation to housing, we consider that a total provision of some 13,500 dwellings should be made within and adjacent to Harlow. As noted above, the precise amounts in various locations should be settled through the LDD process. It is clear, however, that a portion of the housing provision, probably about 3,000 dwellings, will be met outside the Harlow District boundary in Epping Forest District. Any portion of the Harlow figure provided in this way would be additional to the provision for Epping Forest District in our proposed changed Policy H1. Our proposed policy makes this clear.
- 5.98 Effective delivery arrangements will be particularly important in ensuring that development not only comes forward but is also bound into achieving the regeneration and other objectives for Harlow. Matters have moved on since draft Plan Policy ST7 proposing an Area Regeneration Partnership was first drafted, although as we note from

Harlow DC’s submission for Matter 8H1 discussions on a LDV have been hampered by lack of agreement on a common approach to the development and regeneration of Harlow. It is to be hoped that those disagreements will be resolved by finalisation of the RSS, and that a partnership approach involving the relevant local authorities, English Partnerships and other stakeholders can make rapid progress. If not, we share Harlow DC’s view that recourse may be needed to a stronger LDV on the UDC model. Urgent consideration also needs to be given to the benefit of pursuing a joint LDD approach to putting the planning strategy in place.

### **Stansted Airport and the “A120 corridor”**

- 5.99 The decision on the future expansion of Stansted Airport is a momentous issue for the East of England region, and one on which many participants and others maintain strong views. However, as we made clear during the EiP preparatory process, it is not for the East of England Plan or the EiP to review Government Policy as contained in the Air Transport White Paper (ATWP) or to consider the fundamentals of air traffic growth.
- 5.100 For the RSS the main issue is to decide upon the best way to provide for the housing, employment and other development associated with the airport and its growth. On the expansion of the Airport itself, there could be much unnecessary argument about whether the Plan should express a view in favour of one runway or two. Either way the growth of traffic on the current runway is likely to proceed at whatever pace the market dictates until such time as the operator’s long term confidence results in a decision to proceed with a second runway. Although supported by the ATWP, a second runway remains to be brought forward and considered through the proper statutory processes. It is in that sense immaterial whether the RSS “supports” one runway or two, and we conclude that the first sentence of draft Plan Policy ST5 and other similar references in Policy E14 (**R6.13**) and the supporting text are inappropriate.
- 5.101 We are strengthened in this view by the fact that the draft Plan’s provision for housing and jobs appears adequate to absorb the effects of the Airport’s growth over the Plan period, whether with one runway or two. Estimates of the jobs and housing implications of a second runway, compared with full use of a single runway, were contained in reports by Cambridge Econometrics and Halcrow. The former estimated the maximum impact as some 15,500 additional East of England jobs (SRS19, Tables 1 and 6.13) while the latter gives the “most likely” additional employment impact as around 23,500 jobs (SRS18 paragraphs 0.3 and 5.4.2). Various other estimates are offered, but we note that there is difficulty in arriving at a clear or agreed calculation for what the “catalytic” job growth impacts might be. Overall our conclusion is that, like GO-E and BAA, we doubt whether there would be any additional airport-related job growth over and above the level assumed in the forecasts that underlie the draft Plan, especially in the period to 2021. The precise rate and timing of airport related job growth will also be uncertain as it depends on market factors.
- 5.102 We also find there is much to support the Plan’s strategy of channelling housing and job growth not directly related to the airport to Harlow. The nearby towns of Bishop’s Stortford, Dunmow and Braintree have already provided considerable housing, but much of this appears to have been taken up by people commuting to work elsewhere rather than working at Stansted or in (airport related or other) jobs created locally. While there is a certain amount of further scope for development at these towns, the capacity for both housing and employment growth is greater at Harlow (even with the reduction in housing we have proposed at **R5.10**).
- 5.103 Issues for the longer term in connection with Stansted will need to be addressed in considering the broader need for development options to meet regional housing requirements and economic growth in this part of the region. A general location

between Stansted and the Cambridge Sub-Region is one of those trailed for a large new settlement in future. While we would not see the Airport on its own as a sufficient focus for major new urbanisation, accessibility to it will be one factor to consider. Any new growth pole in the vicinity of Stansted would, however, need a much broader economic base, and would have to be shown to be able to provide all the aspects of sustainable communities that we have considered in addressing the spatial strategy (Chapter 4 above). This idea has not matured to a sufficient point, nor has it been assessed against the possible alternatives to merit a proposal in the RSS at this stage. It is, however, one of the options we have identified in Chapter 11 as falling to be addressed in the RSS review.

### **East Hertfordshire**

- 5.104 At Bishop's Stortford, draft Plan Policy ST4 proposes a "strategic growth location" for 2,000 dwellings, which is stated in paragraph 5.136 to involve the release of "Areas of Special Restraint" (ASRs) to the north of the town. We appreciate the view of EHDC and a number of others that this is not a sufficiently strategic issue to be mentioned in the Plan, and as the ASRs do not entail a change to the Green Belt Bishop's Stortford should be removed from Policy SS7. We also note the views of some development sector representatives that given the planning history of Bishop's Stortford north as a location for significant development through release of the ASRs, it should be retained in the Plan as a strategic growth location. It is argued that this would create greater certainty for the LDD process, helping to ensure early delivery. We have no doubt that there is capacity, and a housing requirement, for at least this scale of housing growth at Bishop's Stortford. There are, however, other issues that need to be addressed locally, including pressures on the historic structure and town centre, transport and the landscape setting, all of which are properly matters for LDDs in the context of the overall provision in the Plan. We note that progress has been made through a masterplanning study for Bishop's Stortford supported by GO-E. On this basis we conclude that the precise allocation of quantities and directions for growth at Bishop's Stortford can properly be left to be determined through the LDD process.
- 5.105 When deduction is made for the 10,000 dwellings proposed within East Herts north of Harlow, the draft Plan's remaining provision of 10,800 dwellings appears to forgo part of the capacity of the District which HCC assesses at 11,400. We believe even this may be a conservative view of what may be achieved through a rigorous approach to opportunities for sustainable housing additions in the towns and smaller settlements throughout the District. We therefore recommend a Policy H1 figure of 12,000 for East Herts.

### **Uttlesford**

- 5.106 Uttlesford District, as well as playing host to Stansted Airport itself, has accommodated significant housing development in the "A120 corridor" at Takeley, Dunmow and Felstead. As Uttlesford DC indicates, substantial greenfield commitments remain to be delivered. Nor has there been the hoped for employment growth, in aviation - related or other sectors, despite the availability of sites. Against this background, there would not appear to be any great urgency to provide additional housing growth in Uttlesford. Indeed it remains to be seen whether the rate of delivery will rise from the 250 homes per annum of recent years to the 425 per annum required to deliver Uttlesford's allocation of 8,000 over the remainder of the Plan period.
- 5.107 As regards location, we share the widely expressed view that the allocation of 2,650 dwellings to Dunmow or a new village is unnecessarily specific. There are no cross-boundary or other strategic locational issues involved in determining the distribution of the District's housing allocation, which should be left to the LDD process. Although

we appreciate the desire locally to prevent urban development sprawling around the Airport, we would question whether the proposed general “restraint” policy in draft Plan Policy ST1 is the most appropriate way of achieving this. We see the merit of arguments put forward by some participants in favour of Stansted Mountfitchet and Elsenham, on the West Anglia rail line, as locations for some development as an alternative to further additions in the A120 settlements. Again we would see this as something to be determined through the LDD process.

### **Braintree**

- 5.108 We note the contention of Braintree DC that the whole of the District is not appropriate for inclusion in the Stansted/M11 Sub-Region. With the approach we propose at paragraph 5.82 and **R5.10**, the sub-region would be replaced by a focus on a Growth Point for Harlow and a strategic policy relating to Stansted, leaving the rest of the sub-region, including Braintree, to be covered by the overall policy of the spatial strategy.
- 5.109 Braintree town has experienced substantial housing growth in the form of urban extensions in recent years, well above the high Structure Plan allocation. As in Uttlesford, this has not been matched by employment growth. Whilst we have noted elsewhere that commuting to London and other major centres may be a necessary and beneficial role for the region and for parts of it, we do not consider this would justify further major housing growth at Braintree unmatched with economic growth within the town. Despite local congestion, Braintree has very good road links with a number of different employment destinations, all at some distance. Consequently residents of Braintree already have some of the longest average travel to work distances in the region.
- 5.110 We therefore consider that for Braintree District the proposed housing allocation of 7,700 dwellings is appropriate, even though it is not much more than half the previous Structure Plan rate and will therefore substantially reduce the rate of delivery experienced during the construction of Great Notley and other developments. We also accept the argument of Braintree DC and others that the proposed allocation of 1,200 dwellings to mixed-use developments at Braintree is unnecessarily precise. As elsewhere this level of detail can safely be left to the LDD process without compromising the ability to deliver the planned provision.

### **RECOMMENDATION:**

**R5.10** Delete Policies ST1 to ST7. Include a policy for Harlow as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

#### **Harlow**

The strategy for Harlow as a Key Centre for Development and Change is:

- (1) To promote the renaissance of the New Town through developing its role as a regional housing growth point, Regional Retail Centre and Strategic Employment Location. Regeneration, redevelopment and new urban development will be combined with transport measures and enhancement and conservation of green infrastructure to fulfil this strategy.
- (2) LDDs will provide for a total of 13,500 additional dwellings between 2001 and 2021, including some development outside the administrative boundary of Harlow district. Significant additional housing will be provided:
  - within the existing area of the town through selective renewal and redevelopment, including mixed use development in the town centre;
  - through urban extensions to the east to make optimum use of land between the existing built up area and the M11 motorway;

- through smaller scale urban extensions to the south, south west and west; and
- development will provide for a full range of housing types, sizes, tenures and costs and support development of a skilled and more inclusive local labour force.

(3) The Green Belt will be reviewed to accommodate the new urban extensions. New Green Belt boundaries will be drawn so as to maintain the purposes of the Green Belt, specifically to maintain the integrity of the principles of the Gibberd Plan and landscape setting of Harlow and the physical and visual separation of the town from smaller settlements to the west.

(4) LDDs will provide for the creation and maintenance of a network of multi-function greenspaces within and around the town, taking forward the principles of the Green Infrastructure Plan for Harlow. This network should:

- maintain the principle of “green wedges” penetrating the urban fabric of the town;
- provide for enhanced recreational facilities;
- protect and maintain designated wildlife sites and provide for urban biodiversity; and
- contribute to a visually enhanced character and setting to the town.

(5) The town centre and employment areas will be developed to:

- enhance the role of Harlow as a key centre for higher education and research based institutions;
- provide for growth of Harlow’s established sectors and clusters;
- attract employment related to the growth of Stansted Airport which does not need to be located there; and
- assist the growth of small and medium sized enterprises and the attraction of new economic development and innovation.

(6) The transport priorities for Harlow are:

- achieving a major increase in the use of public transport, walking and cycling within Harlow; new development at the eastern, southern and western edges of Harlow to be used to facilitate improvements for these modes through the town and to the town centre, employment areas and schools;
- resolving traffic congestion for movement within and across the town without encouraging an increase in car use, particularly in peak hours;
- improvements in accessibility by public transport from Harlow to London, Stansted and Cambridge, including priority for capacity and service improvements on the West Anglia main line; and
- improved access from key employment sites to the strategic highway network, including consideration of an east-west bypass in the medium to longer term.

(7) The strategy for Harlow should be delivered through a partnership approach based on the Area Regeneration Partnership. Harlow DC and Epping Forest DC should prepare a joint LDD to establish the planning framework for new urban extensions and the Green Belt reviews. The aim will be to bring forward development simultaneously at various locations so as to facilitate a significant increase in housing delivery at an early stage.

**Note: Policy H1** whole District allocations are:

Harlow	13,500
East Herts	12,000

Uttlesford	8,000
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Braintree	7,700
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The supporting text should refer to the possibility of seeking a stronger delivery mechanism should the ARP not produce the looked for results.

## STEVENAGE SUB-AREA

- 5.111 Stevenage is a relatively late inclusion in the LSCP corridor, having been added in February 2004 through the footnote to the ODPM's announcement concerning the extension of the corridor to Peterborough. Opponents of growth here consider that its inclusion has never been adequately explained but our view (see Chapter 3) is that the LSCP growth corridor concept has little coherence, so the main issue is whether the proposals for Stevenage as a growth point (as summarised at draft Plan Policy SV1) are justified in their own terms.
- 5.112 The concept of expanding Stevenage is not new and was endorsed in the Structure Plan panel's report (1997). The adopted Structure Plan (1998) identified West Stevenage for expansion by 5,000 dwellings (3,600 by 2011) with a possible second later phase of a further 5,000 dwellings. The present extent of expansion proposed in draft Plan Policy SV1 reflects the Borough Council's ambition (as generally outlined in its community strategy and 2021 vision drawn up with its local partner organisations) to commence the process of growing the town from its present size of around 80,000 people towards what it sees as a more sustainable critical mass of about 125,000.
- 5.113 There is widespread support for tackling the regeneration needs of this mature Mark 1 new town, recognised in the draft Plan as a PAER. Needs include regenerating and enlarging the town centre, reducing reliance on slow or negative growth sectors, tackling a wide range of issues around the environment and image of the town, its social and economic conditions, and its education/skills/income levels which are generally untypical of Hertfordshire as a whole. However, some participants fear that building and serving large peripheral greenfield extensions would not necessarily contribute to the substantial task of meeting the town's existing needs and could divert focus and resources from the wider regeneration challenge and in some ways add to existing social and economic pressures.
- 5.114 In our view there is a strong case for a substantial increase in the critical mass of Stevenage both to help address some of the town's problems and to make a substantial contribution towards the housing aims of the Sustainable Communities Plan, but only if delivery mechanisms are created which will be able to address the issues facing the town in a holistic way. The Borough Council clearly favours a strong statutory vehicle, possibly some form of Development Corporation. We have no particular views about that but believe it will be necessary to create a delivery organisation with the powers, responsibilities and resources to act across administrative boundaries and tackle a wide range of physical, social and economic issues in a comprehensive way, not just focusing on adding on the urban extensions, for which much of the necessary resources and delivery effort may come primarily from the private sector.
- 5.115 Turning to where growth should occur, every effort should be made to maximise the amount of development within the town itself in order to make best use of existing services and facilities, diversify its character and structure, and make available the biggest possible choice of sites. However, substantial green field development will clearly be required. From the evidence put to us we conclude that the two growth locations referred to in the draft Plan (west and north) offer the greatest potential in strategic terms. Moreover, there will be substantial advantage in endorsing them as areas to be progressed together rather than sequentially, so that planning can progress as quickly as possible towards a start on delivery. This will be important because completion of an average of 720 dwellings pa over period 2001-21 implies a building rate comparable with what we were told was the average rate achieved between 1950 and 1980 when the original new town was being built. On the other hand we consider it inappropriate to specify the mix of development between these two areas (and within

the town) as this requires more local work taking account of the whole range of locally-relevant factors including infrastructure matters, landscape, issues concerning water over a wider area of Herts/Essex/London, aircraft noise and so on. However, in view of the conclusions of the Stevenage West Inspector about the merits and demerits of the 5,000 dwelling scheme we consider it reasonable to specify 5,000 as a minimum to be provided there. Although Stevenage sought an addition of around 3,000 in the housing provision (and some developers sought an even higher total) we are not convinced that an increased allocation pre-2021 is likely to be achievable within that time-frame. The Borough also sought to open the door to development to the east and south. There may or may not be some potential for growth on those fringes but we are not convinced that it is of strategic scale, so we consider this issue something to be explored and progressed at LDF level if appropriate.

- 5.116 On issues of jobs/homes alignment, Stevenage is within the wider “Rest of Herts” area which has an overall target of 55,800 net additional jobs. The updated alignment study notes the marked discrepancies in the base data for this area, while the methods adopted for resolving them (as between Tym & Partners and Herts CC) produce potentially very different views about whether there is a surplus of jobs or workers. However, the 2001 census profile for Stevenage as a separate entity shows that the town has a small in-commuting balance with complex travelling patterns in all directions.
- 5.117 The Buchanan study compares past jobs growth in Stevenage of 5,000 jobs (12%) over the past 20 years with the EBS03/EG21 forecast of only 1,280 jobs (1%) over the next 20 years or even a decline in the BAU scenario due to restructuring of the local economy. Yet Buchanan looks to an increase of about 9,000 jobs being necessary to serve the scale of the increased housing provision, while Stevenage seeks a dedicated District-level jobs target of 14,800. It is difficult to isolate a jobs target for Stevenage from draft Plan Policy E2 and the background material to it and we have concluded in our discussion of that policy (at paragraphs 6.2-6.17) that the jobs targets should be treated as indicative and set out principally for monitoring purposes. We have suggested (**R6.2**) a combined jobs monitoring target of 14,000 for Stevenage, North Herts and East Herts. However, it is widely accepted that concerted efforts will have to be made by EEDA, the Borough Council, and the delivery agency if new growth is not to reverse the town’s present status as a net importer of labour. This reinforces our view that delivery arrangements are particularly critical in Stevenage.
- 5.118 Turning to transport infrastructure, the draft Plan is relatively silent on the transport-related needs of Stevenage expansion. However, we note that the Borough Council-sponsored Arup study (2005) (TRN91) identifies that substantial growth here would increase the strategic priority of increasing capacity on the East Coast Main Line, the A1(M) and the A505 west-east strategic route between the M1 and M11. This may require some reprioritisation of current transport plans. Importantly, Arup’s work also identifies the need for substantial improvements to local public transport including the planned bus-rail interchange. These recommendations complement the First Secretary of State’s view in the “minded to approve” Stevenage West decision (HSG17B) that there needs to be better integration of public transport between the growth locations, the town centre and the station. Our recommendation (**R5.11**) below reflects these strategic requirements.

### North Herts

- 5.119 North Herts contains Green Belt countryside to the south and a group of three closely-linked towns (Hitchin, Letchworth and Baldock) at the centre before opening out into a section of the East Anglian Chalklands with Royston at the northern end of the District. It appears that the draft Plan nominally provides for about 8,000 of the North Herts



allocation of 15,800 to be attached to Stevenage, leaving North Herts with a residual housing allocation of 7,800 dwellings to 2021. It is not clear to us whether North Herts is likely to contribute as much as 8,000 dwellings to the expansion of Stevenage by 2021. However, from the information produced about commitments and capacity in the North Herts towns we do not consider that circumstances would require reduction of the North Herts allocation of 15,800 even if the District’s Stevenage-related contribution falls below 8,000. On the other hand, our recommendation (R5.11) in respect of the Stevenage growth point may allow for a greater amount of development to occur within the Borough boundary, so its allocation of 6,400 should be regarded as a definite minimum which the LDF may plan to exceed. We recommend a footnote to draft Plan Policy H1 to that effect.

**RECOMMENDATION:**

<p><b>R5.11</b> Delete Policy SV1. Include a Policy for Stevenage as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p>The strategy is to deliver a new vision for Stevenage as a regional employment and housing growth point twinned with transformational physical, social and economic regeneration of the original new town to create a self-contained, sustainable and balanced community.</p> <p>The main elements of this vision are:</p> <ol style="list-style-type: none"> <li>(1) overall housing growth of 14,400 dwellings within and on the edge of the built-up area of Stevenage by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the town but sustainable urban extensions will also be required to the west and north of the built-up area. This provision will include at least 5,000 dwellings at Stevenage West. Identification of land for the urban extensions will require preparation of a joint LDD with North Hertfordshire DC, including strategic review of the Green Belt. That review should establish new defensible long term boundaries which allow scope for continued growth of the Stevenage built up area beyond 2021. The Green Belt review should provide for extension of the Green Belt to cover those parts of the corridor between Luton to the west and Stevenage/Hitchin to the east not otherwise identified as land required to serve the respective long-term growth requirements of the Luton and Stevenage growth points;</li> <li>(2) provision for strategic employment growth over the period to 2021 by improving the competitive position of Stevenage and capitalising on its position between London and Cambridge. Measures to achieve this will include retaining and developing existing advanced technology clusters, creating new high quality sites capable of attracting biotech and R&amp;D activities, remodelling the town’s more outworn employment areas to meet a range of modern requirements, encouraging new enterprise, and promoting a regenerated, expanded and more vital town centre;</li> <li>(3) raised expectations and opportunities and better provision for local residents in terms of health, education, working aspirations and quality of life;</li> <li>(4) improved strategic transport infrastructure including creating the conditions for significant increased potential for public transport usage within the town and improvements in capacity to the East Coast Main Line, the A1(M) and the A505; and</li> <li>(5) substantial improvement to the image and quality of the town’s built fabric and public realm, including multi-functional green space.</li> </ol>
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**Note: Policy H1** whole District allocations are:

Stevenage 14,400\*

North Herts 7,800

\* The Stevenage figure includes provision for up to 8,000 outside the Borough boundary in North Herts. The allowance of 6,400 for development within the Borough should be regarded as a definite minimum which the LDF may plan to exceed

## LONDON ARC SUB-AREA

### Introduction

- 5.120 The uncertain extent and intended policy implications of the London Arc caused much comment at the EiP. As explained in draft Plan paragraph 5.153, the Arc broadly coincides with the Green Belt but the key diagram indicates that it is also overlain by parts of the Thames Gateway South Essex Sub-Region, the Stansted/M11 corridor and the Stevenage sub-area. At the EiP matter 8 sessions the territory covered by the London Arc was split for procedural convenience into two main sections (West and East) although the territory covered by certain local authorities was dealt with under the “overlying” sub-regions/sub-areas.
- 5.121 We share the view of the many participants who found it very confusing to have two sub-regions and sub-areas overlaid upon each other and difficult to try to interpret the resulting three levels of policy within the draft Plan, including the generic policies. Indeed many, not surprisingly, had not realised that this overlapping occurred. This is not the recipe for a plan which is user-friendly or even intelligible to its users. We consider that significant revision is required to draft Plan Policy LA1 in terms of both substance and presentation. Our recommendation below limits the policy to expression of some brief strategic points.
- 5.122 For reasons which we explain along the way, the following part of this report slightly re-arranges the way in which local authorities were grouped together for consideration at the EiP for matter 8 purposes.

### London Arc West

- 5.123 Here we consider matters concerning the seven South Hertfordshire authorities of Three Rivers, Dacorum, Watford, Hertsmere, St Albans, Welwyn Hatfield and Broxbourne. This is an area of great variety where expanded ancient market towns and villages and later commuter settlements, together with 20<sup>th</sup> century new towns, are set in Green Belt countryside, mainly alongside radial road and rail corridors to London – A404, A41, West Coast Main Line, M1, Midland Main Line, A1(M), East Coast Main Line, A10, and West Anglia Line. No single Hertfordshire town dominates across the whole of this part of the region. Rather, it is a complex polycentric area over which neighbouring Greater London has long exerted a powerful influence. This situation is unlikely to change materially to 2021.
- 5.124 Within this area the draft Plan recognises Hemel Hempstead and Watford at draft Plan Policy SS2 as two of the “key (regional) centres on which development and change will be focused” although stating that the nature of that development and change will “vary according to the capacity and policy situation” of the identified centres. In addition, Watford is recognised as a Regional Interchange Centre (RIC) (T2) and a “major regional retail centre” (E9). Hemel Hempstead, St Albans and Welwyn Garden City are identified as “regional retail centres” (E9). Beyond these designations the draft Plan, through policy LA1, generally continues the thrust of present planning policy for South Herts by allowing for the promotion of urban regeneration and sustainable development within built-up areas while otherwise retaining the Green Belt.
- 5.125 For the most part we support that approach. However, we share the views of the North London Strategic Alliance who feel that the draft Plan should more explicitly acknowledge the strong existing and potential future relationships of the Arc with Greater London along the radial routes, and a number of participants (including EEDA) who consider that the strategy should be clearer about the roles of the key centres. In addition, we agree with those who seek a more positive approach towards the potential

roles of Hemel Hempstead and Welwyn Garden City and Hatfield in contributing to the growth needs reflected in the Sustainable Communities Plan. On the latter point, there was debate at the EiP about the implications of the government’s response to a Parliamentary Committee report into “New Towns: Their Problems and Future” (ECN56). That response commented that *“Because New Towns were built within flexible frameworks the opportunity exists for them to benefit from the sustainable communities agenda. In particular the New Towns in the RPG9 area are all capable of further growth and development in an holistic way within current policy guidelines.”* In our view the extent of regional need for new housing, as reinforced by the new household projections to 2026, brings this potential to the fore and makes this an opportune moment to consider the longer term future of these towns.

- 5.126 Unlike Harlow and Stevenage, the towns considered here do not seek substantial expansion but, as discussed below, we believe there is a strong case for a significant level of growth at Hemel Hempstead and Welwyn Garden City & Hatfield. As Mark I New Towns they have a good record of generally matching new housing with employment and are well-placed on strategic communications routes which makes them both attractive for business growth and accessible to the London jobs market. We conclude that the extent of national and regional housing needs, coupled with the benefits of increasing the towns’ size, tying into existing infrastructure and tackling regeneration issues, present exceptional circumstances warranting Green Belt reviews to enable expansion of these towns to take place on the scale discussed below. We recognise that local planning authorities in these areas have not so far been preparing for such growth but, provided that early progress is made with the necessary LDDs, there is every reason to suppose that it could be delivered quite rapidly, given the strategic advantages of the towns and the confidence in their market buoyancy expressed by a number of participants.

### Dacorum

- 5.127 A number of developers called for more emphasis to be given to new development attached to Hemel Hempstead, albeit that much of it could take place in St Albans District, the boundary of which runs close to the edge of Hemel Hempstead in places. Arguments for this included making more efficient use of existing infrastructure, greater provision for market and affordable housing and the achievement of a better homes/jobs balance in an area with good underlying economic prospects.
- 5.128 Dacorum BC and Herts CC jointly accept that the draft Plan Policy H1 allocation for the District could be increased by 800 to 7,100 to reflect urban capacity estimates and release from the Green Belt of some land on the eastern side of the town in response to the 1998 Structure Plan. In our view this is an insufficient response to the challenges facing the region and the opportunities that expansion could present to the town, including repairing its image after the Buncefield fire. We do not necessarily endorse any of the material that was put before us on possible locations for growth as this is a matter requiring local consideration through the LDF process, but these various submissions give us confidence that there are enough options for Dacorum-related housing growth of 12,000 (together with appropriate employment-related and other development) to be achieved without breaching environmental limits in terms of landscape and other factors. While a strategic review of the Green Belt will be required we are confident that this can take place without compromising the broader purposes and integrity of the Green Belt. However, a significant proportion of the necessary urban extensions to Hemel Hempstead would probably have to be in St Albans District, thus requiring close co-operation across the boundary and the development of a strong and effective delivery organisation. Our recommendation (**R5.12, new Policy LA2**) below provides a more specific policy for Hemel Hempstead summarising what we see

as the main policy strands that will need to be further developed, including continued regeneration of the low density post-war town centre where some investment has already begun to take place, and which would be supported by further growth of the town.

### Welwyn Hatfield

- 5.129 The District contains two new towns, Welwyn Garden City (population 34,000 approx) and the adjacent Mark 1 New Town of Hatfield (population 40,000 approx). Both separately and together the towns are therefore somewhat smaller than Harlow, Stevenage and Hemel Hempstead (all approx 80,000). Both have links to London, Stevenage and Peterborough via the East Coast Main Line and A1(M).
- 5.130 Arlington Securities referred to the potential of Hatfield as a town within an economically buoyant part of Hertfordshire which could provide mixed use development on a substantial scale that would be attractive to the housing and employment markets and highly deliverable. They sought an increase of some 15,000 in the draft Plan Policy H1 allocation (to 20,800). On the other hand, Herts CC and Welwyn Hatfield DC suggested that in capacity terms the H1 figure of 5,800 could only be increased by some 300 to 6,100 without breaching the Green Belt.
- 5.131 For the reasons discussed at paragraph 5.125 above we consider that the combined urban areas of Welwyn Garden City and Hatfield could make a greater contribution to the pressing housing needs of the London Arc in a strategic location where prospects for economic growth are favourable, while at the same time adding to the critical mass of the towns and assisting regeneration and urban restructuring where necessary. As in the case of Hemel Hempstead, increased growth here would widen the chance of pre-2021 delivery of more housing across the region. On the basis of the information before us we consider that it would be appropriate to increase the draft Plan Policy H1 allocation for Welwyn Hatfield District from 5,800 to 10,000.
- 5.132 As for potential locations for this growth, we are aware that there is a safeguarded Area of Special Restraint excluded from the Green Belt on the northern side of Welwyn and claims were made for substantial additional mixed development at the former Hatfield Aerodrome, although this would be on Green Belt land which has also been considered in terms of its suitability for mineral-extraction and as a country park between Hatfield and St Albans. We stress that we neither endorse nor reject the claims of any of these areas and there may be other locations requiring assessment as candidates for sustainable urban extensions to Welwyn and/or Hatfield. In our firm view the location(s) of future growth in Welwyn Hatfield District is a matter for determination through a Green Belt review carried out as part of the LDD process. Nonetheless we are satisfied that sustainable solutions will be available for accommodating an additional 4,200 dwellings without prejudice to environmental limits or the overall strategic purposes of the Green Belt and that implementation of appropriate options could assist in advancing associated green infrastructure. Our recommendation (**R5.12, new Policy LA3**) below sets out what we see as the main strands for new policy development.

### Watford

- 5.133 The draft Plan's recognition of Watford as a key centre, RIC and major regional retail centre (the second or third largest in the East of England) is not translated into substantial proposals for housing or employment growth. This is not surprising given the tight confinement of the built-up area by the District boundaries. The town's key nodal location in public transport terms is reflected in large inward and outward commuter flows and is likely to be enhanced by the planned upgrading of the West

Coast Main Line station and interchange and a range of other planned public transport improvements. In our view it will be important to plan to make the most of these increasing assets as a means of adding to the town's economic strength, securing regeneration benefits throughout the urban area, and aiming for higher reliance on public transport by integrating operational planning as much as possible with the nearby London networks. Part (4) of our recommended London Arc policy (**R5.12, new Policy LA1**) will apply particularly to Watford.

- 5.134 However, we believe that the planning issues affecting Watford do not require further guidance in the Plan other than the changed terms of LA1 below. Herts CC and Watford DC jointly accept that potential housing gains from urban capacity during the period to 2021 are likely to exceed the draft Plan Policy H1 allocation and propose an allocation for Watford of 5,200 (although in the context of a decreased allocation for the county as a whole). On the information before us 5,200 seems to be reasonable and achievable, although we do not agree with the suggestion of a county-wide reduction.

### **St Albans**

- 5.135 Herts CC considers that completions, commitments and urban capacity justify increasing the draft Plan Policy H1 allocation for St Albans from 7,000 to 7,200, although in the context of a decreased allocation for the county as a whole. St Albans is not convinced that it is quite as high as this but on the information before us 7,200 is not unreasonable.
- 5.136 If expansion of Hemel Hempstead occurred in accordance with our recommendation it is very likely that much or some of this would take place in St Albans District. We stress that such growth would be additional to the St Albans allocation.

### **Three Rivers**

- 5.137 This is a small District adjoining Greater London. It has relatively small urban areas and heavy commuting flows. EERA's capacity figures indicate a small surplus over the draft Plan Policy H1 allocation and we recommend only a minor rounding-up of that surplus to give a provision of 4,000.

### **Hertsmere**

- 5.138 Hertsmere's characteristics are similar to those of Three Rivers. Here again, EERA's capacity figures indicate a surplus of 619 over the draft Plan Policy H1 figure of 4,200 and we recommend rounding the provision up to 5,000.

### **Broxbourne**

- 5.139 Broxbourne has a strong relationship with the neighbouring part of the Lee Valley area in London, as well as northwards into East Herts, and in our view does not sit easily as part of a growth area centred on Harlow. While it is linked by rail with Harlow and Stansted, its employment, housing market and communications linkages are also strongly influenced by the A10 corridor into north London. Other distinctive key considerations in the Borough are the Green Belt, and the green infrastructure role and regeneration issues of the Lee Valley. We therefore recommend its inclusion in the London Arc (**R5.12, new Policy LA1**).
- 5.140 We agree with criticisms of the draft Plan's proposal for a "strategic growth location" for 2,500 dwellings in the Green Belt at Broxbourne. This appears to be based on a number of sites identified in the Harlow Options Study between the existing urban edges of Broxbourne, Cheshunt and Hoddesdon and A10. However, merely filling in these areas with housing would risk adding to the coalescence of these towns, making them into a continuous urban sprawl for a relatively modest housing gain.

- 5.141 As HCC and Broxbourne BC point out, the draft Plan does not appear to take full account of the Borough's assessed urban capacity (4,710 dwellings), which would deliver the bulk of the Policy H1 allocation of 5,100. Broxbourne accepts that a limited Green Belt release for housing could be an appropriate mechanism to make up the difference and help support regeneration priorities in the Borough. We agree, but consider there should be capacity to achieve rather more without the disadvantages that a release on the scale of 2,500 dwellings would have. We propose increasing Broxbourne's draft Plan Policy H1 provision by 500 dwellings to reflect this. Detailed planning to meet this allocation is a matter for the LDF process.

### **London Arc East**

- 5.142 Here we consider matters concerning the four Essex Districts of Epping Forest, Brentwood, Chelmsford and Maldon. The latter three were considered together at the EiP in the session on "London Arc East". Epping Forest was considered as part of the Harlow section of the Stansted/M11 Sub-Region.
- 5.143 Some doubt was expressed about whether Chelmsford District belongs in the London Arc. While the southern part of it is within the Green Belt, areas to the north and east of the town are not. As Chelmsford is a major centre within the region and the county town of Essex, some seek a clearer identity for it as the centre of a mid-Essex sub-region, including all or parts of nearby Districts such as Brentwood, Maldon and Braintree. Briefly, our conclusion is that identifying such a sub-region would not fill any strategic policy deficit that could not be adequately made good by providing somewhat more policy guidance for Chelmsford itself as one of the regional Key Centres for Development and Change (but outside the London Arc), leaving Maldon and Braintree to be adequately covered by the Plan's general thematic policies. Brentwood and Epping Forest are more logically included as the Essex portions of the London Arc since these two Districts directly adjoin the Greater London boundary, are linked to it by radials (Central Line, M11, A12, Great Eastern Main Line and, possibly eventually, Crossrail) and have broadly the same close relationship with the capital as the Hertfordshire Districts discussed above.

### **Epping Forest**

- 5.144 The only issues covered by the draft Plan that are particular to Epping Forest District are those to do with North Weald and the expansion of Harlow across administrative boundaries into Epping Forest. Those matters are considered at paragraphs 5.83-5.98 above. For Epping, Loughton and the smaller settlements in the District, the planning issues are essentially local, with limited urban capacity tightly contained by Green Belt of generally high landscape quality. However, once the proposals for North Weald and Harlow are discounted, the remaining provision of only 2,300 dwellings, equivalent to 115 per annum, appears low in relation to the development that might be expected to come forward within the urban areas. We note that previous Structure Plan provision was for 160 dwellings per annum, and EERA figures show completions for 2001–2004 at 236 per annum. Given the housing pressures in this part of the region we consider that increased provision of 3,500 dwellings would give greater scope to maximise additional housing from urban redevelopment, mixed use and small scale opportunities.

### **Brentwood**

- 5.145 This is a small District with a draft Plan Policy H1 allocation of 2,900. The Council has identified completions, commitments and urban capacity of nearly 3,100 but suggests that its allocation be reduced to 2,500. On the other hand the EERA figures suggest capacity nearer to 3,500 and we consider that it would not be unreasonable to aim for delivery at this level without breaching the Green Belt.

- 5.146 If funding is secured Crossrail may be completed by about 2014, terminating within the urban area of Brentwood at Shenfield. Essex County Council played down the spatial planning implications of this route, claiming that its termination here was just a matter of operational convenience and that replacing Metro trains with Crossrail would have little effect on travel behaviour or the attractiveness of Brentwood-Shenfield as an origin and destination of trips. Although this was not explored in detail it seems to us that provision of a very frequent direct link to the developing areas of Stratford/Docklands, the City, West End, Heathrow and other places to the west may bring development opportunities/pressures to Brentwood-Shenfield that will need to be positively planned for and harnessed to the maximum appropriate extent. This may be a location to which part (4) of our recommended London Arc policy will apply (**R5.12, new Policy LA1**).

### **Maldon**

- 5.147 Setting aside the special circumstances of the MKSM residual allocation, Maldon has the smallest draft Plan Policy H1 allocation within the East of England (2,400). The District is content with this although Essex would prefer to reduce it by 500. Nor was there pressure from developers or others for an increase. Although the draft Plan proposes a slow-down of past Structure Plan rates we find no reason to recommend any change and consider the H1 figure appropriate to the District's rural nature, the modest size and relative isolation of its settlements, its absence of major employment and transport links and the extent of its low-lying coastal areas.

### **Chelmsford**

- 5.148 There was a widespread view that Chelmsford, as the county town of Essex and a well-connected major town within the region as a whole, receives rather scant attention in the draft Plan. Although its southern areas are within the Green Belt we see the District as having somewhat different characteristics from those we have identified as part of the London Arc. We agree that the importance of the town to the growth agenda of the draft Plan merits giving it more prominence through expansion of the policy framework for its role as a Key Regional Centre of Development and Change.
- 5.149 The District's draft Plan Policy H1 allocation of 14,000 (700pa) represents a 10% reduction from the Structure Plan provision of 777pa but a build-rate at Structure Plan levels has only been achieved since 2001: completions averaged nearer to 400pa in the decade 1991-2001. The Council considers 700pa the maximum consistent with what can be achieved in a sustainable manner and is currently consulting on options for accommodating the allocation through its LDF without breaking into the Green Belt which fringes the town to the west and south. Essex CC suggests reducing the allocation by 1,500, fearing an increased employment deficit but others consider that it should be increased by 3,500 or so (to 875pa) to make up for past backlogs and capitalise on the town's relative economic buoyancy. Such participants tend to feel that the employment potential of Chelmsford is under-recognised in the draft Plan, judging by the forecast job scenarios for the "rest of Essex", defined in the draft Plan as comprising Chelmsford, Braintree and Maldon. As we understand it there has been significant "re-apportionment" of the identified Essex jobs-potential to focus on regeneration areas, particularly Thames Gateway, but we understand the concerns of those such as EEDA and the Borough Council that this should not result in undue constraint on the economic potential of the town. As we have explained in recommendations elsewhere, we do not consider that the employment targets should be used in this way and our recommended policy for Chelmsford (**R5.13**) emphasises the economic role of the town.



5.150 In our view there is a case for placing greater weight on the role of Chelmsford and increasing the draft Plan Policy H1 allocation for the District by a further 2,000 to 800pa. As for the location of that growth, representations were made in support of various possible growth locations to the north-east, north-west, west and south of the town, some of which are in the Green Belt. Other locations beyond the town are also mentioned. However, we consider the choice of locations a matter for local determination through the LDF. In the view of the County and Borough Councils and a private developer too little prominence is given to the proposals for a new station and a bypass at the north-eastern edge of the town, the provision of which it is claimed could be assured (together with other infrastructure benefits) as part of proposed large-scale development in that area. However, other developers challenge the viability and feasibility of a new station and suggest that other locations could provide major transport benefits, including the addition of more capacity at the existing station. These location-specific issues (along with the implications of an increased H1 allocation) will fall to be considered and tested in detail through the examination(s) of the Borough Council’s LDD(s). We therefore consider it premature for the RSS to anticipate the outcome of any of these processes, but recommend that it be noted that strategic review of the Green Belt should not be ruled out as an option if the LDD were to find this the most sustainable way of meeting the growth allocation.

**RECOMMENDATIONS:**

<p><b>R5.12</b> Delete Policy LA1 and replace with the following:</p> <p><b>New Policy LA1: Strategy for the sub-region</b></p> <p>(1) The London Arc Sub-Region comprises those Districts most closely fringing Greater London - the South Hertfordshire Districts of Three Rivers, Dacorum, Watford, Hertsmere, St Albans, Welwyn Hatfield and Broxbourne, together with the Essex Districts of Epping Forest and Brentwood. Within this area the emphasis will be on:-</p> <ul style="list-style-type: none"> <li>- retention of long-standing green belt restraint, supported by more positive “green” use of neglected areas in accordance with green belt purposes; and</li> <li>- urban regeneration, including the promotion of greater sustainability within the built-up areas, particularly measures to increase the use of non-car modes of transport.</li> </ul> <p>(2) Exceptions to this approach are made at Hemel Hempstead and at Welwyn Garden City and Hatfield where strategic Green Belt reviews will be undertaken to permit these new towns to develop further as expanded Key Centres for Development and Change (as further provided for in the specific policies for these towns).</p> <p>(3) Other towns in the sub-region will retain and develop their existing individual roles within its polycentric structure, recognising and making as much provision for new development within the built-up area as is compatible with retention (and wherever possible enhancement) of their own distinctive characters and identities.</p> <p>(4) Across the London Arc the Essex and Hertfordshire Authorities will need to work with those in Greater London (especially Outer London) and to the north to ensure:</p> <ul style="list-style-type: none"> <li>- that opportunities presented by the existing and developing public transport radial routes are exploited to the maximum extent possible to secure mutually-supporting poles of sustainable development at nodal points along these routes; and</li> <li>- that (since London Arc is critical in this respect) a network-wide approach is adopted towards increasing opportunities for inter-urban journeys by public transport, coupled with demand management measures to meet the targets for traffic restraint set out in Policy T3/<b>R8.1</b>.</li> </ul>
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### **New Policy LA2: Key Centre for Development and Change: Hemel Hempstead**

The vision for Hemel Hempstead couples growth in housing and employment with transformational physical, social and economic regeneration of the original new town to create an expanded sustainable and balanced community. The main elements of this vision are:

- (1) Overall housing growth of 12,000 within and on the edge of the built-up area of Hemel Hempstead by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the town but sustainable urban extensions will also be required. Identification of the urban extensions will require preparation of a joint LDD(s) with St Albans DC, including strategic review of the Green Belt to allow scope for continued growth of Hemel Hempstead in the longer term.
- (2) Provision for substantial employment growth over the period to 2021 by:-
  - capitalising on strategic links to Watford, proposed major development at Brent Cross/Cricklewood, Central London and other growth points at Luton and Milton Keynes;
  - regenerating the Maylands Industrial Estate; and
  - reviving confidence post-Buncefield; and creating a more attractive and vital town centre.
- (3) Focused and coordinated action by the LDV and the other responsible agencies to raise opportunities and expectations and make better provision for local residents in terms of health, education, employment and quality of life.
- (4) Improved strategic infrastructure including creating the conditions for significant increased potential for public transport usage within the town, particularly within areas of new development.
- (5) Substantial improvement to the image and quality of the town's built fabric and public realm, including multi-functional green space.

### **New Policy LA3: Key Centre for Development and Change: Welwyn Garden City and Hatfield**

Welwyn Garden City and Hatfield will jointly be key regional centres for development and change within the London Arc. The main elements of this vision are:

- (1) Overall housing growth of 10,000 within and on the edge of the built-up areas of the towns by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the towns but sustainable urban extensions will also be required, to be planned through the LDF process.
- (2) Provision for substantial employment growth over the period to 2021 by:-
  - capitalising on strategic links to Stevenage and Central London;
  - developing new employment sites and updating existing ones;
  - making the most of opportunities associated with the University of Hertfordshire and the new health campus;
  - reinforcing the town centre of Welwyn Garden City; and
  - creating a more vital Hatfield town centre.
- (3) Focused and coordinated action by the responsible agencies to raise opportunities and expectations and make better provision for local residents in terms of health, education, employment and quality of life.

(4) Improved strategic infrastructure, including improvements to the capacity of the A1(M) and the East Coast Main Line and creating the conditions for significant increased potential for public transport usage within the town, particularly within areas of new development.

(5) Retention/reinforcement of the best qualities of Welwyn Garden City and substantial improvements to the image and quality of the two towns’ built fabric and public realm, including provision of multi-functional green space and possibly a country park between Hatfield and St Albans.

**R5.13**

Include a Policy for Chelmsford as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

The strategy for Chelmsford will:

- provide for substantial growth of housing within an allocation of 16,000 for the District as a whole;
- seek to strengthen the town’s role as a county town and further increase and diversify its employment base; and
- aim to maximise the re-use of previously developed land but also provide for urban extensions in locations best able to assist the development of more sustainable transport systems within the town and capitalise on and improve its links to London and other regional centres.

Supporting text: Include a sentence as follows:

“Strategic review of the Green Belt is not ruled out as an option if the LDD were to find this the most sustainable way of meeting the growth allocation.”

**Note: Policy H1** allocations within the London Arc Sub-Region are:

Broxbourne	5,600	
Dacorum	12,000	including any Hemel Hempstead related development in St Albans
Hertsmere	5,000	
St Albans	7,200	excluding any Hemel Hempstead related expansion in St Albans
Three Rivers	4,000	
Watford	5,200	
Welwyn Hatfield	10,000	
Brentwood	3,500	
Epping Forest	3,500	excluding any Harlow related development in Epping Forest
[London Arc Total	56,000]	
Chelmsford	16,000	
Maldon	2,400	

## **BEDFORD AND LUTON GROWTH AREAS (PART OF MILTON KEYNES SOUTH MIDLANDS SUB-REGION)**

- 5.151 While the majority of issues for Bedfordshire and Luton are covered in the MKSM Sub-Regional Strategy (SRS) questions remained for consideration at the EiP concerning the relationship between the SRS and the draft Plan and provision for the “residual” area of Bedfordshire not covered by the SRS. The main issues are summarised in the Panel Note for Matter 8M.
- 5.152 In common with other parts of the region we consider that the strategic framework for Bedfordshire outside the MKSM Growth Area is adequately provided by the Spatial Strategy and generic policies of the draft Plan, together with those aspects of the SRS which have ramifications beyond the actual Growth Area locations (eg in relation to green infrastructure). We do not consider it necessary for the draft Plan to include any additional sub-regional policy content in relation to Bedfordshire (**R5.14**), or to define precise boundaries to the growth locations within the wider MKSM Growth Area, as some participants advocated.
- 5.153 We were asked to consider whether the SRS as it relates to Luton and Bedfordshire should be absorbed into the draft Plan, either this time round or at a future review. In our view provided there is clarity about the content of both documents and the relationship between them, there would seem to be little practical benefit from merging the two at this stage. The MKSM Strategy also relates to areas beyond the East of England in two other regions, the three parts being linked by the over-arching Strategic Policies 1-3 of the SRS. It would be unfortunate to lose that perspective over the whole Growth Area at this stage, before it has been followed through into LDDs even though, as has been widely remarked, there is not a great deal of coherence between the three parts. Within the East of England our recommendations for modifying the draft Plan put the Spatial Strategy into a form in which growth location policies for Bedford/Marston Vale and LDHR could readily be read across. One difference is that the SRS includes indicative planning assumptions looking ahead to 2031, while for the draft Plan we recommend (**R11.5**) an approach for bringing forward new proposals to 2031 in the first review. Such a review may well provide an appropriate moment at which to bring together the two strategies.
- 5.154 There are, however, three issues of linkage between the draft Plan and SRS that need to be followed up now: the reference (in SRS Beds and Luton Policy 2(a)) to bringing forward proposals for compensating Green Belt extensions through the RSS, the reference (in SRS Beds and Luton Policy 1) to the RSS providing the earliest opportunity for the MKSM employment figures to be reviewed, and the need to resolve the discrepancy between the SRS dwelling provision of 45,800 in Luton and Beds and the allowance of 43,800 in draft Plan Policy H1.
- 5.155 In relation to the Green Belt, there were no specific proposals before us for compensating Green Belt consequent upon the SRS requirement. However, for clarity we consider it would be appropriate for Policy SS7 to refer to Green Belt review at Luton, Dunstable, Houghton Regis and Leighton Linlade consequent upon the SRS, including consideration of compensating extensions to the Green Belt. This is reflected in our recommendation **R4.7** for amending Policy SS7.
- 5.156 On employment, there is much support for the revised job growth figures put forward in the Joint Economic Development Strategy (JEDS) (ECN34) for Bedfordshire and Luton, published in June 2005. Bedfordshire County Council proposed adopting the target of 50,000 additional jobs between 2001 and 2021, split 27,000 for Bedford and Mid Beds and 23,000 for Luton and South Bedfordshire. This is a considerable increase

on previous targets, more fully reflecting the growth aspirations and potential of the Growth Area and the County, and a move towards greater alignment between jobs and housing growth. We find the broad division of the overall figure into two blocks for the northern and southern parts of Luton and Bedfordshire to be rational and realistic, reflecting the fluidity of labour supply between the growth locations and their hinterlands within the county. We do not consider any more complex breakdown, for example to distinguish growth at Luton Airport or Growth Area and non-growth area jobs to be necessary or helpful. Finally we agree with the suggestion that the employment figures should be expressed as reference values for monitoring rather than as targets, in line with the approach we have taken throughout the region. This is reflected in our recommended change to Policy E2 (**R6.2**).

- 5.157 On housing, the discrepancy over the SRS figure is simply remedied by adjusting the figure allowed for in draft Plan Policy H1 to 45,800 in line with the adopted SRS. Beyond that it is necessary to consider the appropriateness of the non-growth area provision in Bedford Borough, Mid Bedfordshire and South Bedfordshire. For Bedford Borough the draft Plan H1 provision of only 830 dwellings between 2001 and 2021 is well below the latest assessments of the likely local housing requirements in the network of villages outside the Growth Area. Borough and County Councils argued that 1,250 dwellings would be more appropriate, without detracting from the urban focus of the strategy. We support this figure, rounded to 1,300 or 65 per annum.
- 5.158 For Mid Bedfordshire, the draft Plan Policy H1 provision excludes the northern Marston Vale element provided in the SRS, but its significance is more than that of a “residual” figure as it covers an area including the substantial settlements of Ampthill, Flitwick, Biggleswade and Sandy. Submissions from developers argued that completions and commitments in the District already more than account for the draft Plan provision of 8,270 additional dwellings between 2001 and 2021. Given that completions in 2001 to 2005 have already totalled 2,303 dwellings (equivalent to 575 per annum), this would leave an average of only 398 per annum for the remaining period to 2021, compared with the draft Policy H1 assumption of 414 and the considerably higher provision in the current Structure Plan.
- 5.159 In our view the fact that there are as yet undelivered commitments and Local Plan allocations is not in itself an argument for increasing the SRS requirement. The strategy of focusing growth on the major urban areas would also be undermined by too demanding a requirement for an area like Mid Beds, made up of smaller settlements. Nevertheless, we consider that the nature of the District and its proximity to the growth locations presents significant further potential, and further local growth needs, which would be unduly constrained by the level of provision proposed. We conclude that increasing the provision to 11,000 dwellings, equivalent to 550 per annum, would better reflect the local potential without imposing undue pressure on local centres and infrastructure or housing development unrelated to local economic growth.
- 5.160 In South Beds the issues are different again, with the residual part of the District outside the Growth Area consisting predominantly of small rural settlements surrounded or washed over by Green Belt. The draft Plan provision in Policy H1 also predates the decision to provide separately for growth at Leighton Linlade as part of the SRS. Against this background there are arguments for reducing the residual figure of 1,600 dwellings or 80 per annum for the rest of South Beds to something less – BCC and SBDC suggest 600 would reflect past “fall-in” rates of 24 dwellings per annum plus an existing Local Plan allocation of 120. Against this some developers have suggested much higher figures. Given the extent of the Growth Area towns within South Beds we do not see how the residual area could support significant additional housing growth as well without unsustainable expansion of small settlements and erosion of the Green

Belt. However, reduction to a level as low as that suggested by the County Council would in our view allow too little flexibility to meet local needs as they arise. We conclude that a figure of 1,000, equivalent to 50 dwellings per annum, would provide such flexibility without creating such pressure as to breach environmental and Green Belt constraints.

- 5.161 Of the other issues discussed under Matter 8M, we consider that draft Plan Policy BL1, which gives EERA’s view of the expansion of Luton Airport, is unnecessary. The planning context for the Airport is provided by the MKSM strategy and the references to it in the SRS together with Policy E14 as we recommend it be changed (**R6.13**) are in our view adequate. We do not accept the argument that the final implications of the ATWP or the emerging proposals for expanding the Airport call for any fundamental revisiting of the MKSM strategy, as these matters were largely in the background when the SRS was finalised. More detailed consideration will revolve around the process for the Airport’s master plan and any eventual planning application for it. Draft Plan Policy BL2 relates solely to waste management in the Marston Vale and these issues should be effectively covered in the enhanced Waste Management section of the Plan which we discuss at Chapter 10. Issues concerning green infrastructure in Bedfordshire, including requests that the strategy mention the Forest of Marston Vale, the Ouse and Ivel Countryside Project and the proposal for a canal between Bedford and Milton Keynes fall within the scope of the strategic approach to green infrastructure discussed at paragraphs 9.3-9.7, **R9.1**.

#### **RECOMMENDATION:**

##### **R5.14 Bedfordshire and Luton**

Delete Policies BL1 and BL2.

**Note: Policy H1** whole District allocations are:

MKSM Growth Area locations:	45,800
Bedford Borough*	1,300
Mid Beds*	11,000
South Beds*	1,000

\* Outside MKSM Growth Area locations

## BURY ST EDMUNDS SUB-AREA

- 5.162 The three Districts of Mid-Suffolk, St. Edmundsbury and Forest Heath do not form a sub-region within the draft Plan, but the part of Mid Suffolk close to Ipswich is included in the Haven Gateway SR and Bury St. Edmunds has a sub-area policy BSE1. Haverhill in St. Edmundsbury and Newmarket in Forest Heath are included in the Cambridge SR and there were suggestions from the District Councils that this should mean they are part of the LSCP Growth Area, thus giving access to Growth Areas funding. SEBC went further, arguing that the whole district was influenced by Cambridge and should be part of the CSR. When considering the CSR (paragraph 5.67 above) we conclude that the sub-region boundary does not need to extend across county boundaries, as there is no longer a defined role for the “out of county” towns, including Haverhill and Newmarket, in accommodating housing growth dispersed from Cambridge.
- 5.163 Although Cambridge will no doubt continue to exert a considerable influence on surrounding market towns, future growth in those towns should be as part of a complete strategy in which housing is accompanied with local employment growth, services, transport and other infrastructure. This is an important tenet of Sustainable Communities and of the Spatial Strategy, and indeed is very much the principle on which SEBC wishes to see growth at Bury. As predominantly rural areas with market towns we consider that the guidance of the over-arching Spatial Strategy for such areas, strengthened as we recommend, provides an adequate framework to guide LDDs in these three Districts. For Bury St. Edmunds, which is identified as a key centre for urban development in its own right, we consider draft Plan Policy BSE1 remains generally appropriate and should be retained as part of our recommended strategy (**R5.15**).
- 5.164 The question of access to funding for infrastructure and other investment to support growth is a separate issue, and should not be a determining factor for the shape of the strategy. As discussed elsewhere (paragraph 4.14 above) this is not confined to designated Growth Areas but needs to be considered throughout as part of the implementation plan for the RSS. Any specific proposals for infrastructure investment, for example improvements to the A14 which may be needed to support further growth at Bury, will in any event need to satisfy all the relevant criteria to be accepted for funding priority.
- 5.165 In relation to housing, both Mid Suffolk and St Edmundsbury sought increases to their provision in draft Plan Policy H1. For Mid Suffolk the draft Plan provision for 7,700 additional dwellings between 2001 and 2021 would correspond to an annual rate (385) broadly in line with recent rates of completions, but we understand this is largely accounted for by commitments and windfall. MSDC argued that this allows insufficient flexibility for further allocations to meet local needs, and sought additional provision for 500 dwellings, while development interests sought higher figures. We accept the case for higher provision, given the potential for further development at Stowmarket and smaller settlements within the District, supported by local services and infrastructure. As we understand it the draft Policy H1 provision includes the figure of 790 homes for the “edge of Ipswich” in the Haven Gateway part of Mid Suffolk. At paragraphs 5.29 and 5.30 and **R5.3** we have concluded that the edge of Ipswich provision should be separate from and additional to the provision for the remainder of the District. Our proposed provision of 7,500 for Mid Suffolk other than at the edge of Ipswich therefore represents an increase of 600 dwellings overall.
- 5.166 St. Edmundsbury argued that the draft Plan H1 provision for the Borough of 8,000 dwellings (400 per annum) is below the current Structure Plan level (440 per annum).

When completions, commitments and draft Local Plan allocations to 2016 are taken into account, it was suggested that the proposed provision of 8,000 would mean a drop to an annual rate of only 366 in the period 2016 to 2021. SEBC, with support from Suffolk CC, have sought an addition of 1,800 dwellings to the Borough's provision in draft H1. Developers proposed larger increases to reflect the growth potential of the Borough. One proposal is for an urban extension of 4,000 homes to the east of Bury St. Edmunds. We recognise that Bury St. Edmunds has considerable potential for further growth, albeit that there are capacity issues that need to be resolved on the A14. There are also questions, however, about what sort of growth will occur. Large peripheral housing estates relying on access to other locations via the A14 would not be consistent with the strategy's aims for reducing road traffic increase and providing better balanced communities. We consider the Borough Council is taking the right approach in its draft replacement Local Plan in seeking to reduce levels of out-commuting. Overall, therefore, we recommend a changed H1 provision for St. Edmundsbury of 10,000 dwellings – an increase of 2,000 on the draft Plan. Any increase beyond that in the latter period of the Plan should be considered in the first review, in the context of a clear strategy bringing together housing, employment and infrastructure issues.

- 5.167 In Forest Heath the draft Plan provision of 6,400 dwellings or 320 per annum is above the existing Structure Plan rate of 260 and much further above the rates achieved in recent years since 1996, although this is expected to change with completion of major development at Red Lodge. There were development sector arguments for increasing the provision to provide for more growth, notably the Orion proposal for a new settlement of some 4,500–5,000 homes in combination with a major leisure facility. While we recognise FHDC's aspiration to secure a regional scale leisure facility in the district, we consider the new settlement proposal poorly related to the sustainable development principles of the strategy both in locational terms and in other ways such as its potential impact on the water environment and reliance on car borne commuting. We take the view that draft Plan policies C2 and C4 provide an appropriate framework for considering sporting and leisure provision, and that the draft H1 provision for Forest Heath remains appropriate.

#### RECOMMENDATION:

**R5.15** Delete Policy BSE1. Include a Policy for Bury St Edmunds as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

At Bury St Edmunds provision will be made for further employment, service and housing development that reflects its role as a service centre and its position on the road and rail corridors between Cambridge and Ipswich. The scale of employment growth will seek to minimise the volume of long distance out-commuting from the town. Priority will be given to the development of vacant and underused land in a manner that respects and enhances the historic town centre. In the longer term the scope for additional growth beyond 2016 will be considered at the first review of this Plan in the context of the resolution of infrastructure issues, particularly the capacity of the A14 and its junctions. Both development and transport strategies will promote a shift to non-car modes of travel.

**Note: Policy H1** whole District allocations are:

Forest Heath	6,400
Mid Suffolk	7,500 (+ approx 800 on the edge of Ipswich)
St Edmundsbury	10,000



### KING’S LYNN SUB-REGION

- 5.168 The draft Plan defines the King’s Lynn Sub-Region (KLSR) as including the town and an extensive rural area stretching as far as Hunstanton, Fakenham, Swaffham, Downham Market and westwards into Lincolnshire.
- 5.169 As in the case of Norwich, the position of King’s Lynn as the dominant town over much of this territory is not in dispute but there is a lack of consensus about how far that dominance extends and, more importantly, the purpose and usefulness of defining a KLSR. Those disagreements are summarised in the panel note for matter 8D and not repeated here.
- 5.170 It would clearly be possible to identify a range of sometimes different functional relationships between Kings Lynn and a number of other towns and centres (for example in terms of transport accessibility and commuting patterns, retail catchment, housing markets, service provision etc). However, we doubt whether the policies for KLSR make good any strategic policy deficits which cannot adequately be covered by the generic draft Plan policies or through more detailed policies adopted in LDDs. Draft Policies KL2 and KL3 concern the town of King’s Lynn and in our view their content (and that part of draft KL4 not better covered in the RTS) is best combined into a single policy focusing attention on the role of the town as a Key Centre for Development and Change (**R5.16**). While the subject matter of draft Policy KL1 ranges wider than the town, we consider that these issues can also be adequately covered through LDDs insofar as they are not reflected in the generic policies of the draft Plan.
- 5.171 Developers suggest increases of up to 2,000 or more in the KLWNBC housing allocation in order to assist urban and economic regeneration of this self-contained area and the provision of more affordable housing. We note that the draft Plan annual average rate of 550pa is lower than the Structure Plan rate of 610pa although annual average completions achieved in 1996-2004 were lower, at 470pa. Although the Environment Agency introduced a note of caution about flooding issues in this area we did not hear anything to lead us to conclude that a modest addition to the housing total for the District could not be achieved without breaching flooding constraints. We therefore recommend provision of 12,000 dwellings (600pa). This is more or less the same rate of provision as was proposed in the Structure Plan and not much above the amount of capacity already identified by KLWNBC. For their part the Council sought inclusion of a specific housing allocation of 7,000 for the Kings Lynn urban area. However, this suggestion does not itself require uplift to the draft H1 allocation and our recommendation should enable 7,000 (and possibly comfortably more) to be achieved in the town through the LDF without specific mention in the RSS, thus enabling the Borough Council to move more quickly towards its target population for King’s Lynn.

**RECOMMENDATION:**

**R5.16** Delete Policies KL1-KL4. Include a Policy for King’s Lynn as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:

At King’s Lynn LDDs will make further provision for housing, employment and other growth in the town in order to further the aims of achieving an urban renaissance and raising the town’s population to 50,000. The LDDs will develop policies to:

- enhance the quality of the urban environment;
- make better use of previously-developed land;
- provide for an improved range of services in the town;
- support the regeneration of communities; and

- provide improved transport choices both within the urban area and between the town and the areas looking to it.

**Note: Policy H1** whole District allocation is:

King's Lynn West Norfolk	12,000
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## CHAPTER 6 - ECONOMIC DEVELOPMENT, RETAIL AND TOURISM

### Policy E1

- 6.1 This policy attracted little comment but in our view its content is better placed as part of draft Policy E3 as its subject-matter appears to make it a logical component of the land allocation topic. This would also give draft Policy E2 more prominence. Our recommendations reflect this point (**R6.1**).

### Policy E2

- 6.2 The biggest employment-related question, frequently returned to at the EiP, was whether or not the draft Plan is a “jobs-led” strategy. The draft Plan asserts (paragraph 5.9) that it is, although EERA back-tracked from this to some extent, explaining the phrase as short-hand for the search for a better balance between jobs and homes as part of sustainable development. The SS10 jobs target of 421,500 is said to align with the Regional Economic Strategy (RES) and give spatial expression to it. While some participants would prefer housing growth levels to be more clearly linked with (and made subordinate to) phased achievement of the jobs targets, representatives of the house-building industry argue that the draft Plan cannot be other than housing-led, certainly within those areas affected by the Growth Areas agenda, albeit that issues of employment opportunities, alignment and commuting are important matters to consider when deciding the location and scale of growth.
- 6.3 The main issues concerning the draft Plan’s jobs target are (a) the robustness of the regional total in SS10, (b) the assumptions behind the “distribution” of this total at more local levels through draft Policy E2 and (c) the role of these “targets” in the strategy. Related issues are those of jobs/homes alignment and commuting issues.
- 6.4 A number of “EBS02” employment scenarios by Experian contributed to the preparation of the strategy. The first, the “business as usual” (BAU) scenario, estimated regional growth of 220,000 jobs by 2021. A second scenario (EG21 “enhanced growth”) increased the total to 331,000 reflecting regional policy aspirations. A further scenario (EG21+) produced a regional total of 421,500 which was used as the basis for the draft Plan. The move from EG21 to EG21+ appears to have been a rather complex process lacking real transparency, involving the “integration” of EG21 with further refinements of sub-regional policy objectives for regeneration and housing growth. The process is described generally in paragraph 6.12 of the draft Plan and in more detail in ECN28, STR13 & STR14. Thus, as described in paragraph 2.2 of ECN29, the regional total is “a mixture of demographic and economic projections tied to an economic aspiration”.
- 6.5 As to whether or not the regional target of 421,500 is likely to be robust, alternative totals put to the EiP cover a very wide range. Some suggest staying closer to the BAU projection of 220,000 (11,000pa) while work by Regional Forecasts points to 408,000 (20,400pa). Much higher targets of 537,000 (26,850pa) and 580,550 (29,027pa) are suggested by DLP on the basis of work carried out by IER.
- 6.6 The draft Plan regional target represents jobs growth of 21,100pa (c0.8%). This compares with regional growth over the 20-year period 1981-2001 estimated in the range of 25,000–27,000pa (c1.4%), and a slightly lower (but widening) range of 15,000–25,000pa in the decade 1991-2001. In the even shorter term (2001-04) there is still greater uncertain divergence between estimates of what has occurred with the

Labour Force Survey suggesting growth of 13,000pa and the probably highly questionable ABI information indicating 44,000pa. However, conclusions about net change over 20 years cannot reasonably be based on such short term information.

- 6.7 There must be considerable uncertainty about national, regional and local employment trends to 2021, taking into account such varied factors as the long-term positive and negative impacts of increased global competition, the future demographic composition of the region, the amount of housing and employment growth in London, and future trends in commuting and employment patterns/preferences including job-sharing. On the other hand, as indicated in STR31B (part 4), the region has consistently increased its share of national employment since at least 1971 and independent forecasts expect it to continue to do so. Moreover, although there are divergent opinions about the reliability of the methodology behind the regional jobs target, 421,500 represents a forecast increase in the regions' share of national employment from 8.7% in 2001 to 9.3% in 2021. In the context of a substantial increase in population supported by new house-building this does not seem to be an unachievable or unreasonably aspirational overall target compared with longer term trends in the past, bearing in mind the likely mutually-reinforcing relationship between population increases on the expected scale and the creation of new job opportunities. Provided that development is concentrated as much as possible at towns with reasonably strong and self-sufficient economies or can proceed in step with regeneration efforts that have a good prospect of succeeding we consider that a regional target for increasing jobs by some 421,500 to 2021 is broadly supportable in the context of a housing increase of 478,000. However, as we are recommending increasing the housing provision to 505,500 we consider that it would be appropriate to raise the regional employment target to 440,000. This would retain broadly the same ratio between the overall regional increases in jobs and homes as in the draft Plan (roughly 0.88 in the latter and 0.87 in our recommendations) and is not on a fundamentally different scale of achievability.
- 6.8 Turning to the more local distribution of the regional total (as set out at policy E2), the process of moving through the scenarios from EBS(02) BAU to EG21+ often resulted in jobs targets being substantially increased at one stage or another, as compared with the base position in EBS(02) BAU. In some areas (eg Beds/Luton, Thames Gateway) the targets were substantially increased. In others there is less change. Table 6.1 below illustrates the general scale of these changes, and also incorporates the EBS(03) EG21 scenario produced for the LSCP Growth Area Study. In total this is similar to the EBS(02) EG21 scenario but also contains some major differences, eg in relation to Hertfordshire and Cambridgeshire/Peterborough, thus emphasising the potential degree of variation between the jobs scenarios and the danger of treating the policy E2 figures as more than general indications of the levels of employment increases that delivery agencies need to strive to attract and make provision for if sustainable patterns of development are to be achieved.

<b>Table 6.1 : Targets for net additional local jobs 2001-2021 – movement from BAU to EG21+ (E2) via EBS(02)/EG21</b>				
<i>Figures extrapolated from the base data in EEDA document ECN28</i>				
<b>Area</b>	<b>EBS(02) BAU</b>	<b>EBS(02) EG21</b>	<b>EBS(03) EG21</b>	<b>EG21+ (E2)</b>
<b>Beds/Luton</b>				
Luton/S Beds	4,290	10,060	10,090	53,400 assumed in the draft RSS
Bedford/M Beds	3,970	8,300	11,480	
<i>VC total</i>	<i>8,250</i>	<i>18,350</i>	<i>21,560</i>	
<b>Cambs/Peterborough</b>				
Cambs	60,850	73,700	63,310	75,500
Peterborough UA	14,390	19,290	11,490	17,400
<i>VC total</i>	<i>75,230</i>	<i>92,980</i>	<i>74,810</i>	<i>92,900</i>
<b>Essex &amp; Unitaries</b>				
Thames Gateway South Essex	7,090	17,490	15,480	55,000
HG Essex	4,790	9,330	10,110	20,300
Harlow/ M11 sub-region <sup>1</sup>	10,880	18,010	16,070	40,700
Rest of Essex	11,160	17,140	15,540	
<i>VC total</i>	<i>33,930</i>	<i>61,970</i>	<i>57,180</i>	<i>116,000</i>
<b>Herts</b>				
<i>VC total</i>	<i>32,490</i>	<i>60,200</i>	<i>96,690</i>	<i>64,700</i>
<b>Norfolk</b>				
King's Lynn/ West Norfolk	2,560	4,330	4,450	9,900
Breckland	3,010	4,640	5,650	
N Norfolk	3,400	4,520	6,020	
Great Yarmouth	810	2,210	410	32,700
“Greater Norwich” <sup>2</sup>	19,030	26,910	18,390	
<i>VC total</i>	<i>28,820</i>	<i>42,600</i>	<i>34,900</i>	<i>42,600</i>
<b>Suffolk</b>				
HG Suffolk	25,700	32,770	28,060	29,400
Waveney	3,370	5,010	4,400	4,700
Rest of Suffolk	12,620	17,140	20,210	17,800
<i>VC total</i>	<i>41,690</i>	<i>54,920</i>	<i>52,670</i>	<i>51,900</i>
<b>East of England total</b>	<b>220,400</b>	<b>331,020</b>	<b>337,840</b>	<b>421,500</b>

*Totals may not add due to rounding*

<sup>1</sup> Whole of Uttlesford district included.

<sup>2</sup> Area includes the districts of Norwich, South Norfolk and Broadland.

- 6.9 Throughout the EiP we heard a number of claims that the sub-regional distribution in draft Policy E2 led to some very challenging “aspirational” targets (needing various forms of “intervention”) in areas with the greatest need for economic stimulus or regeneration while, conversely, making inadequate provision for potential future growth targets for better-performing areas. For example, an increase of 12,400 in the jobs target for Norfolk was sought on the basis of the NEG study (ECN18-22) while other participants suggested that the draft Policy E2 figures may not make adequate allowance for economic buoyancy in areas such as Hertfordshire, Cambridge and Chelmsford.
- 6.10 We refer to some of these claims in the sub-regional sections of Chapter 5 of this report. However, the responses by EERA/EEDA in relevant matter 8 sessions were sometimes unclear since they wished to retain the regional target as a kind of control total while at the same time indicating both sympathy to the idea of more flexibility in areas with greater potential and unwillingness to reduce aspirational targets elsewhere. This begs the question: what is the purpose of the draft Policy E2 jobs-targets? The supporting text to draft Policy E2 implies that they provide a basis for planning for employment premises at LDD level, but Districts commonly expressed themselves unclear about how to translate often sub-regional employment targets (sometimes covering extensive areas) into meaningful local planning policies. We support the EERA/EEDA intention to bridge this gap by producing District-level figures (as expressed in draft Plan paragraph 6.14 and at the EiP) but caution strongly against giving too much weight to such figures, or treating them as realisable or necessarily reliable “targets”, bearing in mind the amount of data manipulation behind the E2 targets, the statistical difficulties in obtaining fully reliable data on workplace employment, and the further potential for distortion that could occur at District level.
- 6.11 In summary, therefore, we conclude that the draft Policy E2 figures are far from adequate for use as a sound tool for setting precise sub-regional or District relationships between the release of house-building land and the achievement of a particular net increase in jobs. Used appropriately and with care, they may be helpful as one of a number of inputs to the Employment Land Reviews that LPAs will be preparing to underpin LDDs, although of course jobs are increasingly located in many places other than conventional “employment land”. For the most part, however, the main use for the draft Policy E2 figures would be to provide a means of monitoring actual changes in employment against a fairly rough and ready reference point for the purpose of informing future reviews of the RSS.
- 6.12 Turning finally to the issue of the “alignment” of new homes and jobs, the outputs of the “alignment study” (STR31, 31A, 31B) give a general indication whether the balance of homes and jobs at sub-regional level moves in a generally positive or negative direction if the housing and jobs targets were both met, albeit that these indications can be sensitive to quite small changes in assumptions about the inputs. For the most part the indications from STR31B indicate a move to greater regional alignment. In this respect our main recommendations for change in relation to draft Policy H1 appear to reinforce overall alignment objectives in the areas which they affect. For example, in Peterborough and “rest of Herts” (where there are currently “job surpluses”) we have recommended significant increases in the amount of new housing development, and in Stansted/M11 (where there is currently a “worker surplus”) we have recommended a significant reduction in housing allocations. In other areas where we have recommended more than minimal amounts of change in housing provision (Cambridge, Norfolk, and Chelmsford) we expect that this will also assist general alignment, in the case of Norfolk linked with revision to the employment target in accordance with the NEG study.

- 6.13 The influence of London also cannot be ignored. Parts of the region have long been dependent for the economic health of their communities on the proximity of London. This is unlikely to change significantly over the Plan period and provided that good public transport connections can be retained and improved there is no reason why a proportion of housing growth at appropriate locations should not rely upon economic links to existing and planned employment centres in Central, North and East London. The areas which we have recommended for increased housing development, or where we have supported increased provision, are well connected in this respect.
- 6.14 Flowing from all the above, we consider that draft Policy E2 is not a policy instrument capable of being implemented in the way that its terms suggest. Bearing in mind that the RSS has only partial influence over the employment level achieved in any area our recommendations are that (a) the draft Policy SS10/E2 targets be regarded as reference values for monitoring purposes and (b) the geographical components of draft Policy E2 be simplified to provide employment targets for Districts, or more commonly clusters of Districts grouped together to provide a proxy for a sub-regional dimension in the reduced number of cases where we consider this necessary. This arrangement will also avoid the over-complexity of attempting to collect and monitor reliable employment data at sub-District level. From what we were told about the technical problems about obtaining reliable employment data it appears that our recommendations will, in themselves, provide enough of a challenge in the present stage of data development.
- 6.15 As indicated above (at paragraph 6.7) we propose a modest increase of the indicative regional target to 440,000, retaining the same approximate ratio between the overall numbers of new homes and jobs as in the draft Plan. This makes more headroom for the increases sought in Bedfordshire/Luton (through JEDS, ECN34) and in Norfolk (through NEGS) and for some increase in/reduction of the policy targets in areas where the draft Policy H1 growth has been substantially increased or redistributed.
- 6.16 As for the more local distribution of the regional target, we have been unable to track down a complete District-level breakdown of the draft Policy E2 (EG21+) figures although we have noted District tabulations of the EBS02 and EBS03 EG21 figures in ECN28. Our recommendation is set out at **R6.2** below, with all figures rounded to the nearest thousand in keeping with their broad indicative nature.

### Policy E3

- 6.17 This draft policy was seen as guidance which would help to “operationalise” the targets in draft Policy E2. Its general content was not subject to any widely-agreed criticism except in the sense that it is not regionally-specific. We agree with the view that more centrality should be given to the role of employment land reviews carried out in accordance with the ODPM good practice guide and therefore recommend moving the gist of the last paragraph of draft Policy E3 into a restructured first paragraph (**R6.3**). The new paragraph places “employment land” in the wider sectoral and locational perspective that will need to apply to such reviews and also reflects a call for wider reference to “the needs of the local economy” rather than more narrowly to “business”. Although some LPAs would like stronger policy protection of employment land we consider that local requirements for managed increases or reductions in the stock of land for particular sectoral activities will vary greatly. It is the role of the reviews to identify those local circumstances and requirements, so we see no need for a region-wide policy that points in one direction or another. However, we agree that the scope of draft Policy E3 ranges wider than “allocations” and should also include “safeguarding” and “protection” as appropriately justified by the outcome of the reviews.
- 6.18 In addition, we reflect agreement about the inclusion in E3 of reference to key rural centres, but do not support explicit inclusion in a regional strategy of locations other

than these. As for the role of EERA in the employment land reviews, we recognise that some Districts have already undertaken (or embarked upon) reviews as part of the evidence base for their LDFs and do not wish to have these undercut by new regional advice. This is understandable. However, the broad guidelines offered by the ODPM publication offer great scope for very different approaches to this important task. We consider that for future reviews there would be benefit in EERA having a central role in devising a common region-wide methodology which would secure more commonality and direct comparability of qualitative and quantitative inputs and outputs to assist future development and monitoring of policy at regional and sub-regional scale while also serving fundamental local purposes.

### Policy E4

6.19 There was a considerable amount of uncertainty and misunderstanding about the intended implications of draft Policy E4 and its two associated paragraphs (6.19 and 6.20). Some urged the inclusion of much of 6.19 and 6.20 in draft Policy E4 and/or reference to other towns in the list of locations identified in the policy, while others identified perceived inconsistencies between the places listed in draft E4 and paragraph 6.20 respectively.

6.20 Further clarification was also sought about the status of “strategic” and “sub-regional” sites (and the requirement for at least one of the former and two of the latter in every sub-region) as mentioned in paragraph 6.19. The derivation of this distinction is the Chesterton study of 2001 (ECN11A) which identified 68 “strategic” sites and 76 “sub-regional” sites across the region, broadly defined as capable of accommodating users requiring plots of 10ha+ or 1ha respectively. In our view these definitions are somewhat rigid and not particularly suitable or helpful. We consider it more appropriate at the level of an RSS to put the emphasis on identifying “regional strategic employment locations” where local authorities, through LDDs, will have the responsibility of identifying strategic sites for identified purposes as outputs of the employment land reviews required under Policy E3. Beyond that we see merit in combining the content of draft Policy E4 and paragraph 6.20 to give more regional specificity without creating a straightjacket which might prevent the identification of other sites where necessary (**R6.4**). We also agree with suggestions that Colchester, Chelmsford and Luton be added to the list of named locations.

### Policies E5 to E8

6.21 There was little discussion of these policies. In our view draft Policies E5, E6 and E8 add little value as regionally-specific spatial policies and could be deleted (**R6.5**, **R6.6** and **R6.8**). Draft Policy E5 is also very hard to comprehend, although we have melded the gist of the last sentence into our recommended E3. Draft Policy E7 is possibly more relevant for retention although, again, it has limited spatial specificity. This could be overcome as EEDA suggests, and as we recommend, by referring to the clusters identified at page 46 of the RES (**R6.7**).

### Policies E9 and E10

6.22 PPS6 requires (at paragraph 2.13) that an RSS should “*set out a vision and strategy ... for higher level centres in the region and their role as the focus for major retail, leisure, office and other main town centre development of more than local importance ...*”. In contributing to this task the RSS is to:

- “*develop a strategic framework for the development of a network of centres.....taking into account the need to avoid over-concentration of growth in the higher level centres;*



- *make strategic choices about those centres of regional and, where appropriate, sub-regional significance; and*
- *assess the overall need for additional floorspace over the regional spatial strategy period... and for five-year periods within it and... identify where the identified needs would best be met having regard to the Government's objectives."*

- 6.23 Some criticise draft Policy E9 as merely a static list of the present ranking of centres with no element of dynamism or policy development. However, as the draft Plan preceded PPS6 it is not surprising that there is no body of work specifically undertaken to address the issues referred to above, particularly the last. Rather, EERA states that the classification adopted in draft Policy E9 is based on “Experian Goad rankings, RPG6 and RPG9, the results of research in the region, and discussions with local authorities and partners” (EERA24). Some form of ranking of centres appears to be supported by PPS6, as long as the policy implications of this are clear. In our view this makes for a need (as EERA accepted) to combine the subject matter of draft Policies E9 and E10: we recommend doing so under the title “city/town centres of regional strategic importance” as detailed below (**R6.9**).
- 6.24 A range of points is made in the representations about the inclusion or non-inclusion of particular centres in the two categories identified in draft Policy E9. At the EiP participants suggested that Stevenage and Harlow should be raised to the “major regional centre” category in order to reflect the significance of the two towns in regional growth terms and allow more scope for them to add retail floor-space and progress to positions of more importance in the retail hierarchy. Although both of these towns are not far below the “top ten” centres in regional terms their national rankings (as indicated in ECN48A and B) do not offer much support for promoting them to “major regional” status. We were not presented with any region-wide evidence to justify moving centres from one tier to another, nor did we receive convincing evidence that the current classification of any individual centre would inhibit its current plans for regenerating and appropriately enlarging its retail offer. EERA confirmed that it was not the intention of draft Policies E9 and E10 to do so, although some participants representing towns near to Harlow or Stevenage (such as Welwyn Garden City) considered the risk of potential excessive growth, damaging to other towns, a good reason not to promote them.
- 6.25 Bearing in mind the locations of the second tier centres in relation to the first tier and to other major centres outside the region such as London and Milton Keynes, our overall conclusion is that draft Policy E9 draws a reasonable line between the two tiers. However, representations were also made about the terms of the categorisation used in the policy. In our view the term “sub-regional centre” could be confusing since the centres in question are not necessarily the centres of sub-regions. Consequently we recommend use of the terms “regional centre” and “major town centre” as these better describe the roles of the identified centres in the national and regional contexts.
- 6.26 A case was also advanced for including Lakeside within the upper tier of the retail framework rather than excluding it as an out-of-town centre. We recognise that Lakeside is a major retail destination within the region but in our discussion of Thames Gateway we conclude that it is not appropriate or necessary to identify this classic out-of-town centre as a “town centre of strategic regional importance”. However, we have recognised the need for a clear long-term strategy for remodelling the wider Lakeside Basin and have recommended a new policy framework for that area as part of our policy **ETG2/R5.2**.

**Policy E11**

- 6.27 There was little discussion of this draft policy which we see as something of a hotch-potch. Firstly, as participants pointed out, LDDs will have no real power over the subject matter of the third paragraph. As for the rest of the draft policy, the type of development addressed here appears to have nothing to do with Use Class A1 retail trading or the “sequential test” and more to do with Use Class B8. In addition the policy is not regionally distinctive. We recommend its deletion (**R6.10**).

**Policy E12**

- 6.28 Draft Policy E12 (and paragraph 6.42) seem to have a rather uneasy relationship with PPS6. The latter states (paragraph 2.14) that *“Having regard to the key objective of the Government’s town centre policy, it is unlikely that such new development or the expansion of an existing out-of-centre regional or sub-regional shopping centre will meet the requirements of that policy. Were a need for... (such development)... to be identified it should be addressed through the RSS. Proposals to renew or replace existing facilities... (in such centres)...where this would (not) involve additional floorspace may be appropriate.....”*
- 6.29 It is not entirely clear what draft Policy E12 is seeking to achieve but it could be seen as delegating decisions about further retailing at new/expanded out-of-centre regional centres to LDDs. In our view the draft policy needs modification to ensure that it is not inconsistent with PPS6. We recommend accordingly (**R6.11**).

**Policy E13**

- 6.30 Relatively few comments were made about this draft policy. We find it broadly sound but recommend some editing to give more focus and concision (**R6.12**).

**Policy E14**

- 6.31 We indicated at an early stage that we did not consider it fruitful to use time at the EiP discussing “regional policy” on the future role of Stansted and Luton Airports (as opposed to associated off-airport development implications) as this has already been decided at national level through the Air Transport White Paper. Draft Policy E14 amounts to an EERA position statement on its conditional support for expansion at the airports and is not consistent with the content of the White Paper. In our view the policy should simply be confined to a statement about the key factors (other than the White Paper) that will have to be considered when decisions are made about the master plans and the future individual phases of development, namely the sustainable development principles set out in Policy SS1 (changed as we recommend at **R4.1**), other policies in the RSS, Environmental Impact Assessment as appropriate, and the approach to accommodating related development. The revised Policy E14 we recommend at **R6.13** reflects this. It is also slightly expanded to include fuller guidance on development at Stansted, in the light of our recommendation to delete the separate sub-regional policy on the airport (see paragraphs 5.82, 5.99-5.103, **R5.10**).

**RECOMMENDATIONS:**

<b>R6.1</b>	Policy E1	Delete
<b>R6.2</b>	Policy E2	Change as follows:

**Policy E2: Jobs Growth 2001-2021**

The following indicative targets for net growth in jobs for the period 2001-2021 are adopted as reference values for monitoring purposes and as guidance for regional and local authorities, EEDA and other delivery agencies in all their policy and decision making on employment matters.

<b>District groupings</b>	<b>Recommendation</b>
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Beds & Luton

Bedford/Mid Beds	27,000
Luton/South Beds	23,000
<b>Total</b>	<b>50,000</b>

Cambridgeshire and Peterborough

Cambridgeshire [Cambridge/South Cambs/East Cambs/ Huntingdon/Fenland]	75,000
Peterborough UA	20,000
<b>Total</b>	<b>95,000</b>

Essex & Unitaries

Essex Thames Gateway [Thurrock/Basildon/Castle Point/ Southend-on-Sea]	52,000
Haven Gateway - Essex [Colchester/Tendring]	20,000
London Arc - Essex [Epping Forest/Brentwood]	12,000
Rest of Essex [Harlow/Uttlesford/ Chelmsford/Braintree/Maldon/Rochford]	25,000
<b>Total</b>	<b>109,000</b>

Hertfordshire

London Arc - Hertfordshire [Three Rivers/Watford/Hertsmere/ Broxbourne/Dacorum/St Albans Welwyn Hatfield]	63,000
Rest of Herts [North Herts/Stevenage/E Herts]	14,000
<b>Total</b>	<b>77,000</b>

Norfolk

Kings Lynn & W Norfolk	5,000
Great Yarmouth	5,000
Breckland	6,000
North Norfolk	4,000
Greater Norwich [Norwich/Broadland/S Norfolk]	36,000
<b>Total</b>	<b>56,000</b>

Suffolk

Haven Gateway-Suffolk [Ipswich/Suffolk Coastal/ Babergh]	30,000
Waveney	5,000
Rest of Suffolk [Mid Suffolk/St Edmundsbury/ Forest Heath]	18,000
<b>Total</b>	<b>53,000</b>
<b>OVERALL REGIONAL TOTAL</b>	<b>440,000</b>

**R6.3** Policy E3 Change as follows:

**Policy E3: Provision of land for employment**

Local development documents will ensure that an adequate range of sites/premises (including dedicated land/sites and sites within mixed-use areas and town/district centres) is identified and then subsequently allocated, safeguarded and/or protected to meet the full range of sectoral requirements needing to be accommodated to meet the job growth targets of Policy E2 and the needs of the local economy as revealed by up-to-date employment land reviews. EERA will take a leading role in coordinating a consistent regional evidence base for, and approach to, future employment land reviews.

Where development proposals and issues cross local authority boundaries this approach will be developed and applied across the whole urban or development area.

Sites of sufficient range, quantity and quality to cater for all relevant employment sectors will be provided at appropriate scales in urban areas, market towns and key rural centres. These will be at locations which:

- minimise commuting and promote more sustainable communities by achieving a closer local relationship between jobs and homes;
- maximise potential use of public transport;
- minimise loss of, or damage to, environmental and social capital, and where necessary substitute for any losses and secure positive enhancements. This will often mean giving precedence to the re-use of previously developed land and, wherever possible, the intensification of use on existing sites over the release of greenfield land;
- meet the needs of the region's significant clusters as set out in the Regional Economic Strategy; and
- provide appropriately for identified needs for skills-training and education purposes.

**R6.4** Policy E4 Change as follows:

**Policy E4: Regionally strategic employment locations**

Local development documents will identify readily-serviceable regionally strategic employment sites of the quality and quantity required to meet the needs of business as identified through the employment land reviews referred to in policy E3. Such sites will be provided particularly (but not exclusively) at the following regional strategic employment locations:

- Harlow, Stevenage, Hemel Hempstead and Luton – to assist regeneration needs, ensure growth in key sectors and clusters, and ensure a balance to housing growth;
- Thames Gateway, linked to the strategies for the Key Centres of Development and Change at Basildon, Southend-on-Sea and Thurrock Urban Area;

- Cambridge Sub-Region, to secure its full potential as a centre for world-class research and development;
- Peterborough, to achieve regeneration, attract business activities and key sectors and clusters including environmental services;
- Norwich, to support regeneration and the town’s role in bio technology;
- Haven Gateway, to support growth and regeneration at Colchester and Ipswich and the latter’s role in ICT, and development associated with port expansion at Harwich and Felixstowe;
- Great Yarmouth, to support development associated with port expansion;
- Hertfordshire, at locations (other than those noted above) where this would support strong, continued growth of mature and emerging clusters and sectors, and at other locations supporting regeneration of the Lee Valley; and
- other Key Centres of Development and Change identified in the Spatial Strategy, including Chelmsford, to meet needs as may be identified in local development documents.

**R6.5** Policy E5 Delete

**R6.6** Policy E6 Delete

**R6.7** Policy E7 Change as follows

**Policy E7: Supporting cluster development**

Clusters are an important feature of regional economic growth and prosperity. Local development documents will support the sustainable and dynamic growth of inter-regional and intra-regional business clusters, especially the regionally significantly clusters identified in the RES as follows:

- a life-science super cluster spreading from London as far as the Norwich Research Park;
- an energy cluster on the Norfolk/Suffolk coast;
- an environmental technologies cluster stretching from Essex to Cambridgeshire with a focal point in Peterborough;
- a motor sports cluster with a focal point at Hethel in Norfolk and linking to Cranfield;
- a multimedia cluster from London through Hertfordshire to Norfolk; and
- a strong ICT cluster in the Cambridge area.

Local development documents will also support locally significant clusters defined by local economic partnerships in collaboration with local authorities and EEDA.

Support for clusters will be demonstrated by:

- ensuring the availability of a sufficient quantity, quality, and choice of sites including provision for incubator units, grow-on space and larger facilities for established business clusters;
- addressing accommodation needs immediately adjacent to or close to key institutions including higher education and university facilities; and
- addressing the need for user restrictions to secure the use of premises for specific activities.

**R6.8** Policy E8 Delete

**R6.9** Policies E9 & E10 Combine as follows:

**Policy Exx: Regional structure of town centres**

The cities and towns of regional strategic importance for retail and other town centre purposes are:

- Regional centres: Norwich, Watford, Ipswich, Peterborough, Cambridge, Colchester, Chelmsford, Basildon, Southend; and
- Major town centres: Hemel Hempstead, Stevenage, Bedford, Luton, Harlow, King's Lynn, St Albans, Welwyn Garden City, Bury St Edmunds, Great Yarmouth, and Lowestoft.

Major new retail development (and other main town centre complementary uses) will primarily be located in the centres identified above and will be consistent in scale with the size and character of the centre and its role in the regional structure. Local development documents will propose higher order provision only where need is clearly established and the development would:

- result in a more sustainable pattern of development and movement, including a reduction in the need to travel;
- have no significant harmful impact on other centres or the transport network; and
- be within the limits of environmental capacity.

Any new regional centres will be subject to similar considerations, and will be brought forward only as part of a review of this RSS.

Below the level of the centres of regional strategic importance local development documents will identify a network of more local town centres, district centres, neighbourhood centres and village centres.

**R6.10** Policy E11 Delete

**R6.11** Policy E12 Change as follows:

**Policy E12: Out-of-centre regional/sub-regional shopping centres**

No need has been identified for additional out-of-centre regional/sub-regional shopping centres, or for the extension of retailing at such centres during the plan period.

Local development documents will define the future role of centres of this kind, in particular to determine whether they should remain purely retail centres or alternatively, develop into town centres with a full range of service provision. This course will only be adopted where this would improve social, environmental and economic sustainability and deliver improved sustainable transport accessibility, particularly improved public transport access.

**R6.12** Policy E13 Change as follows:

**Policy E13: Tourism**

Local development documents will:

- include policies to encourage realistic and sustainable investment in the maintenance, improvement, regeneration, extension and appropriate diversification of the region's tourist industry, recognising that some tourism potential is based upon the presence of unique local features or assets, but that negative effects on the natural and built environment, local distinctiveness and host communities should be avoided or minimised; and
- integrate with other plans and strategies for managing tourism, particularly local and regional tourism strategies and visitor management plans, especially those for

regenerating seaside resorts and extending employment outside the normal tourist season.

**R6.13** Policy E14 Change as follows:

**Policy E14: The region's airports**

The roles of Stansted and Luton Airports are outlined in the Air Transport White Paper. Future development at these airports (including timely provision of infrastructure, a surface access strategy in accordance with the objectives and policies of the RSS, and adequate environmental safeguards) will be planned in detail through airport master plans. These will need to be consistent with the sustainable development principles in Policy SS1 and other policies of this RSS. Individual phases of development will, where relevant, be subject to the process of Environmental Impact Assessment.

At Stansted Airport development for operational and directly associated airport employment will be located at the Airport itself, and land within the airport's boundaries will be safeguarded for that purpose only. Employment development not directly related to the airport's operation will be located at Harlow and nearby towns identified in local development documents in accordance with the general RSS spatial strategy. Housing development related to employment growth at the Airport will be located at Harlow and nearby towns as provided in LDDs.

Support is also given to the modest expansion of Norwich and Southend Airports to meet local market demand, subject to the same conditions as those outlined above. In addition, support is given to the relocation of Cambridge Airport operations to a suitable alternative location, subject to the same safeguards.





## CHAPTER 7 - HOUSING

### Background

- 7.1 The level of growth in housing provision is a central feature in the draft Plan. We consider it is not driven by a single issue, but needs to be tested from several different perspectives. These are the demographic issues, the housing market, economic and employment issues, and issues of capacity in terms of the spatial functioning of the region, land, infrastructure and environmental limits in the region as a whole and its parts. Some of these issues need to be considered at a region wide strategic level while others need to be built up from more local insights to form the overall picture. Our consideration of the regional housing provision combines both these approaches.

### Projected household requirements

- 7.2 An important part (but only part) of the evidence base against which the draft Plan needs to be tested is information on the expected growth of households in the region. Continuing national and regional demographic work provides a changing backcloth of assumptions and data. The key projections which informed the preparation of the draft Plan were produced by the Population and Housing Research Group of Anglia Polytechnic University (APU) in September 2003. These were later revised with updated assumptions and presented in document EERA 13A, which was discussed at the EiP seminar session on 13 September 2005. Other relevant population and household projections are: ONS/DETR 1996-based (published 1999), ONS (consultation) and ODPM interim 2002-based (published 2004). After the close of the EiP, on 14 March 2006, new ODPM 2003-based household projections were issued, based on ONS 2003-based population estimates (EXAM47E). As indicated at the EiP we have taken account of these latest projections together with participants' written comments submitted in accordance with the timescale we set out. Each new set of projections tends to show a higher projected increase in population and households than the previous set.
- 7.3 For the East of England, the population and household change from 2001 to 2021 (the Plan period) projected by each of the above sets of projections may be summarised as follows (figures may not sum due to rounding):

<u>Projection</u>	<u>Population (000s)</u>			<u>Households (000s)</u>		
	2001/2021	change	%	2001/2021	change	%
ONS/DETR 1996-based	5448/5941	493	9%	2284/2701	417	18%
ODPM Interim 2002-based	5400/6064	663	12%	2259/2749	490	22%
APU revised 2001-based*	5400/6050	650	12%	2237/2737	500	22%
ODPM 2003-based	5400/6139	739	14%	2236/2797	561	25%

\*APU figures are for “short term migration” assumption.

- 7.4 Discussion at the EiP seminar session on 13 September 2005 and in Matter 1B explored some of the issues behind the projections. An important element of the increase in the number of households is the trend to reducing household size. This reduction over time in household size, or increase in the propensity of people to form separate households, applies to the whole of the existing population as well as the growth from natural

increase and migration. By comparing population and household numbers from the table above it will be seen that the implied average household size reduces between 2001 and 2021 from about 2.4 persons to 2.2 in all the projections, although the latest ODPM figures show marginally the largest fall. The figures are:

<u>Projection</u>	<u>Average Household size (= population/households)</u>	
	<u>2001</u>	<u>2021</u>
1996-based	2.39	2.20
Interim 2002-based	2.39	2.20
Chelmer revised 2001-based	2.41	2.21
ODPM 2003-based	2.42	2.19

7.5 The trend for average household size to fall must eventually level out in the longer term. Within the population the tendency to form separate households varies between different groups by age, sex and other characteristics, and it is these formation rates that are modelled in the projections. As we understand it from Professor King's (APU) contribution to the discussion, the trends giving rise to increasing numbers of smaller households, including household fission and greater life expectancy, are not likely to reach "saturation" in the foreseeable future. Although the differences between the various projections might appear marginal, one reason why the latest ODPM projections show higher household growth than previously expected seems to be that household size is projected to fall further than in previous projections.

7.6 Migration is the other key variable in the make up of the region's future population and households. Net in-migration to the East of England accounted for some 77% of the population growth between 1998 and 2003. International and inter-regional migration are contentious issues for some participants, both from a technical and a policy point of view. Assumptions about net-migration relate to the difference between large flows both in and out of the region. Relatively small changes in either direction can therefore have a disproportionate effect on the net value. Migration into the UK increased markedly from around 1996. APU based their projections on an assumption that this more recent "short term" trend would continue over the 20 years to 2021. We understand that the chief reason for the difference between the APU and the 2003 based projections is that while APU assumes migration remaining level at the "short term" rate, the 2003-based projections assume that it will go on increasing over time. As several respondents have noted, the latest ODPM projection demonstrates once again that projected household numbers are highly sensitive to assumptions about future migration. What will happen to migration in future remains a matter for conjecture. Hertfordshire CC and others offered a number of reasons why it might revert to lower levels.

7.7 Policy arguments about migration relate to different views about whether the region, or areas within it, should provide for continuing net in-migration on the levels projected. Some local authorities and other respondents, particularly in the southern parts of the region, are concerned about in-migrants who commute to London rather than working locally. This is seen as adding to transport problems and putting pressure on local housing markets. In coastal and rural areas there are concerns about retirement migration which is seen as adding to burdens on local services while again helping to push house prices out of reach of local people. Conversely, it is argued that in-migration is also needed to augment the region's labour force and that even where in-

migrants do not fill jobs within the region they contribute economically to the growth of employment generally. It needs to be borne in mind that migration into the East of England cannot be viewed in isolation but is part of a wider pattern in which large flows predominantly in certain age groups move into London from all over the UK and abroad, counteracted by flows outwards by other age groups into the East of England and “rippling out” beyond. These flows depend on far wider influences than the supply of new housing in one region.

- 7.8 The APU work included some projections done on a “nil-net migration” basis. These help to illustrate the scale of migration as a component in household growth in different parts of the region. The inference drawn is that the nil-net migration projection serves as a proxy for the household growth generated within the region or area itself. Care needs to be taken in interpreting this, however. It cannot be assumed that if the region, or an area within it, provides for a “nil-net migration” level of housing growth it will be meeting its own locally generated needs. The reality is often more likely to be that where demand is high in-migration will still take place and a higher proportion of “indigenous” need will either not be met or will be displaced to other parts of the region and beyond. We consider, therefore, that EERA was right to take account of “with migration” projections in arriving at its proposals for additional housing.
- 7.9 Another way of understanding the demographic implications of the proposed housing provision lies in the “RSS dwelling-led” projections prepared by APU. These in effect take the draft Plan provision of 478,000 additional dwellings and estimate how much of the projected growth in population and households would be accommodated if that amount was built. The results, given in tables 10 and 11 of EERA 13A, show the draft Plan accommodating a population increase of 565,000, some 13% below the APU projection of 651,000 and 24% below the ONS 2003-based figure of 739,000 (EERA 13A, Tables 10 and 11). In terms of households the differences are smaller: the draft Plan would accommodate an increase of 464,800 which is some 7% below the increase of 499,600 in the APU projection (EERA 13A, Table 17). Obviously it would be further (about 17%) below the 561,000 in the latest ODPM projections.
- 7.10 It is important to remember, as many respondents have stressed, that household projections are not statements of housing requirements but statistical exercises showing what would happen if demographic trends continue. They do, however, represent the best available statistical basis for considering how many additional households there might be requiring homes in the region in future. Given the number of variables and the uncertainties of forecasting over a 20 year period, we consider it important not to try to be over-precise in interpreting projections for planning purposes. The limits of “sound science” in this area need to be understood. No one projection provides a “correct” figure of household increase that should be planned for. The new ODPM 2003-based figure does not in our view provide a firm basis for re-working the regional housing provision in the draft Plan. More detailed geographical breakdowns and technical explanation of the new projections did not appear until later on in the process of writing this report. We have not studied them, and nor do we have the benefit of participants’ views on them.
- 7.11 The conclusion we drew from the EiP discussions and the weight of demographic evidence available by the close of the EiP was that the proposed housing provision of 478,000 additional dwellings between 2001 and 2021 is too low and that provision well in excess of 500,000 would more fully address the numbers of households likely to be requiring homes in the East of England. The subsequent ODPM projections lend weight to that conclusion and suggest the demographic pressure may be greater than previously thought. We take no more notice of the new information than that. If the RSS provides for significantly less than the demographic information suggests, there

needs to be a clear understanding of what is being assumed about the difference – will the households not form, will they go somewhere else, or will they contribute to increasing housing stress through sharing, homelessness etc? A failure to make sufficient provision to accommodate the number of households expected to be in the region would need to be clearly explained and justified in policy terms.

### **The Barker review and the Sustainable Communities Plan**

- 7.12 The Barker review was commissioned to examine the issues underlying the lack of supply and responsiveness of housing in the UK. It was essentially a broad and long term review of housing markets and the house building industry and their interaction with the planning system. The Government responded to the review with a package of announcements, including the new draft Planning Policy Statement PPS3, which appeared midway through the EiP in December 2005. It is appropriate for us to have regard to this, but given the draft nature of new PPS3 and the stage already reached in preparing the draft Plan, there is a limit to the specific account that can be taken of the new approach. For example market assessments on the basis of new sub-regional housing market areas and the advice of the proposed National Advice Unit are not available. Nevertheless the general message that we take from the Government's response to the Barker review is a need to take account of housing supply, affordability and market demand issues when testing the regional housing total.
- 7.13 In practice issues and arguments raised by the Barker review played a part in much of the discussion at the EiP. These issues link to those pertaining to the Sustainable Communities Plan and the proposals for the Growth Areas which, as the Barker report notes, seek to address problems of housing supply. The premise is that there is a significant and growing shortage of homes to meet the needs of households, particularly in southern England. For the East of England, the problem may be simply illustrated by the statistics that the "household numbers increased by 5.4% over 1996-2001, whilst the stock of dwellings increased by just 4.6%" (STR33, Building for the Future, ODPM 2003, page 5). Other evidence that may be taken to corroborate this are the widening "affordability gap" in the region, from a house price to incomes ratio of 5.4:1 in 2001 to 8.2:1 in 2004 (HSG4 paragraph 3.19), and the fact that indicators of housing stress and assessed need for affordable housing have continued to rise during a period of sustained economic growth and high employment.
- 7.14 The Government's response to these issues has been to seek a "step change" in new housing supply, a key element in doing this being the four Growth Areas, three of which cover parts of the East of England. EERA argues that the draft Plan provision of 478,000 additional dwellings does indeed provide for a step change over levels previously provided for in RPG6 and RPG9. For the region as a whole, HSG21 gives this uplift as 15%, while for the LSCP Growth Area alone it is shown as 27%. Many developers argue that this does not respond adequately to the Government's call to consider additional provision for the LSCP Growth Area. This is generally equated to an additional 18,000 dwellings, although the development industry also argue for greater additions to take fuller account of a backlog of past under-provision or to create more "headroom" to increase the rate of delivery. Various suggestions were made for increasing the regional total up to 575,000 or more.
- 7.15 The need for a step change in housing supply in the region is by no means universally supported. One suggestion is that recent experience shows that the region can subsist on the level of completions that has been achieved. Another argument, which frequently comes from the local level, is that increasing housing provision will simply increase pressure on the region's environment and infrastructure and raise the numbers of people in an area without making any appreciable impact on affordability for local

people. Allied to this is a call for greater resources to be put into the provision of affordable housing, rather than a reliance on increased market housing to deliver a percentage of affordable provision. Further arguments that are advanced are that London should do more to accommodate its own growth needs and that Government should direct growth to the Midlands and the North where economic growth is wanted, housing is more freely available and prices are lower. The Sustainability Appraisal strikes a similar note on page 57, where it sees a policy of directing growth to other regions as an alternative that has not been appraised.

- 7.16 We recognise the appeal of such arguments, however none of them in our view disposes of the need to consider what is an effective and realistic planning response to the housing market issues for the region. We would agree with the perception that house builders are unlikely to be able or willing to build enough new homes to bring prices down, either on a regional or sub-regional level. However the converse also applies: the further demand is allowed to outstrip supply in the region, the more the affordability gap will widen for its residents, with all the adverse consequences that entails. There are of course limits to the extent to which planning policy can be expected to deliver increases in affordable housing. We note that as part of the Sustainable Communities Plan the Government has a number of policy initiatives designed to increase affordable housing provision and opportunities for home ownership. The funding available to the region for affordable housing provision has been significantly increased. Equally, however, it is unrealistic to expect that public funding, or development contributions, will in future subsidise the housing needs of an ever increasing proportion of the region's people because they cannot afford to enter the market.
- 7.17 With regard to other regions, we note that the latest proposals for the review of the London Plan continue the aim of maximising the capital's provision to meet its own housing needs, seeking to go above the present provision of 23,000 homes per annum and the "aspirational" target of 30,000. Though the proposals are still to be tested and finalised, there will be limits on what can be achieved in that direction. For the regions further north aspirational policies in RPG and programmes of economic regeneration backed by substantial EU and other funding have been a consistent feature of regional and national policy for many years. More recently there are many signs of this investment and policy emphasis bearing fruit in a renaissance of the cities of the North and Midlands. As we understand it, however, Government takes the view that suppressing growth in the south, far from assisting greater growth elsewhere, will be damaging for the UK economy as a whole.
- 7.18 The conclusion that we draw is that the Plan does need to address housing supply issues positively, and it is appropriate to seek a "step change" in new housing delivery to do this. There is no precise way of determining an appropriate market related figure for the region. In effect there is no upper limit, since environmental limits and the constraints of infrastructure and delivery are most likely to dictate something lower than a purely market driven figure. One guide to what is considered to be the lower limit of a step change is that provision 20% above previous plans is the level considered by ODPM for an area to qualify for Growth Areas Funding. Over the region as a whole it is clear that a level of provision which approached the expected household increase would also represent a "step change" over what has been provided under previous plans.

### **Delivery**

- 7.19 A "step change" may also be considered in terms of the increase that the provision would represent over current levels of delivery. EERA figures indicate that over recent years dwelling completions have been running at around 20,000 per annum in the region as a whole. According to EERA's view on phasing of housing provision (Table

4, EERA 30C) completions in the five years to 2006 (the first quarter of the Plan period, which has now almost elapsed) will amount to some 97,963, or an average of 19,592 homes per annum. If the remainder of the provision of 478,000 were all delivered in the remaining 15 years to 2021, this would equate to 25,335 homes per annum, an increase of 29%, compared with what is estimated to be achieved over the period 2001–2006. The EERA table, however, sees delivery over the next five years (2006-2011) rising to 20,726 homes per annum, an increase of only 5.8% on the 2001-06 rate. The remainder, if all delivered between 2011 and 2021, would then represent an annual rate of 28,306, some 44% above the 2001-2006 rate. The “if” is a large one and depends on progress with large long term developments and infrastructure and achieving a very steep rise in output after 2011.

- 7.20 Phasing and delivery are perhaps more important than the overall housing number or the 20 year average in achieving a “step change” in the availability of new housing. Simply adding numbers to the regional housing total would not necessarily do anything to accelerate housing delivery in the region. While EERA may have sought to take a realistic view of the phasing of the draft Plan’s proposed development, it holds out the prospect of only marginal increases in delivery before 2011. EERA has not ventured an estimate of how rapidly delivery would increase after 2011, but it would presumably take some time to reach the level required to complete the total. However the housing supply problem is with us now, and the earlier housing output can be increased the more benefit the Plan will bring.
- 7.21 One argument put forward by developers is that the draft Plan tries to put “too many eggs in too few baskets”, and that earlier delivery would be assisted by having a larger number of options for significant housing development. We see the force of this, and also the argument that maximum use should be made of urban capacity and smaller scale opportunities, particularly ones which do not give rise to new infrastructure requirements. On the other hand, the unsustainable aspects of sporadic and incremental development are to be avoided. We appreciate that the draft Plan does seek to take account of available capacity. However, we conclude that in reviewing the proposals at a sub-regional level it is appropriate to test whether there are options which have the prospect of delivering more housing earlier, while meeting the objectives of the Plan and the principles of sustainable development.

### **The economy**

- 7.22 It is an axiom of sustainable communities that they should be places in which to both live and work, and that housing growth therefore needs to be accompanied by additional jobs. This has been a prominent concern of EERA in preparing the draft Plan and is reflected in the pursuit of a “jobs led” strategy. This concept needs to be properly understood. We do not believe that there are sufficiently robust and detailed data and methodologies to fix a regional or sub-regional job target, and then to determine the housing provision as a derivative of this. Nor is this what EERA have attempted to do. The approach is more one of ensuring that there is a realistic match between housing and job growth both regionally and on a more local basis. The “alignment” studies form an important part of this approach.
- 7.23 We consider the Plan’s approach to employment and economic policies in Chapter 6. For the purposes of considering the regional housing provision, it is important that the relationship between housing and jobs cannot be too precise or mechanistic. It depends on the location and the nature of its economy. In some places, such as the generally buoyant towns of the London Arc, economic growth and labour demand fuel the need for homes, while in some new housing will itself form part of the impetus for economic growth – this would apply to some of the “growth points” such as Harlow, Ipswich and

Peterborough. In other places, including some remoter centres and rural areas, while new homes may bring some jobs with them, the ability of the economy to support housing growth will be limited. Overall it remains an important aim of sustainable development to ensure that jobs and homes are steered to locations where they are mutually reinforcing and help to achieve more sustainable travel to work etc.

- 7.24 Another economic aspect of the regional housing provision is the ability of the development industry to deliver the level of housing proposed, particularly where it represents a big increase on past levels. Various assertions were put forward about the reasons for historic under achievement of planned housing provision where this has occurred, and about the challenge to the industry represented by the proposals in the draft Plan, or any higher provision. We are in no doubt that any major increase on previous levels will be challenging to achieve, and will require a positive commitment on the part of both developers and local planning authorities. Like other economic issues, the nature of this challenge varies with location. In some places economic constraints in terms of markets, infrastructure or other constraints are being overcome, or will be addressed in future, while in others they may form permanent limits to the amount of growth that could occur.
- 7.25 Overall we consider that neither general economic factors nor the capacity of the industry provide a basis for determining a specific regional housing total should be aimed for. Instead they form issues that need to be considered in testing the proposals at a sub-regional and local level.

### **Environmental capacity**

- 7.26 The SA/SEA raises a general concern about the potential environmental impact of the level of growth proposed. There is a general proposition, widely shared, that a lower level of growth would involve less risk of breaching environmental or other capacity, while the higher the growth the greater is this risk (see SA/SEA page 58). The water environment discussion identifies a potential case of environmental limits, which also affects the timing and location of growth as much as the overall level. The SA/SEA report (page 40) concludes that it is impossible to identify a single precise environmental limit to water abstraction (and hence to growth). We discuss the water environment constraints at Chapter 9, paragraphs 9.33-9.47.
- 7.27 Some of the other strategic environmental concerns, particularly those to do with climate change, have a very broad relationship with the level of development proposed. In many respects they relate to the consequences of human activity, such as travel and other energy consuming activities, rather than the amount of new housing. In that sense, and given that development does not create people but only accommodates them, the impacts are transferable – if they do not occur in new homes in the East of England they will occur elsewhere and in other ways. This is one of the broad conclusions of the Government study of the sustainability impact of additional housing (HSG24). There is also the consideration that the location and manner of development can either help to reduce such impacts or increase them. Generally it is understood that the region, like any other, needs to seek to reduce its environmental “footprint” by more sustainable development. At the present state of knowledge, however, there does not appear to be any method of determining an “environmental” optimum share of the nation’s household growth that should be provided for in this or any other region. A more important consideration is to ensure that whatever the level, the policy framework for development delivers it in the most sustainable form that can be achieved.
- 7.28 With regard to other aspects of environmental limits, a similar conclusion may be drawn – that they do not lend themselves to arriving at an overall quantum of housing that may be regarded as the environmental capacity for growth for the region. Environmental

features are too location-specific for that, and the effect of development on the environment depends as much on where and how it is carried out as on the amount of it. We consider the environmental aspects of the draft Plan generally in Chapter 9. In the light of our conclusions there, we have recommended strengthening of some of the ENV policies in the Plan to make it clear that they apply to provision for development throughout the region. With that in mind we have approached the environmental testing of the regional housing provision by building up the picture from the local and sub-regional level, considering the specific concerns raised within the discussions in Matter 8.

### **Testing the housing provision**

7.29 In the light of all the considerations above, we have not sought to establish a “top down” figure for the appropriate level of housing provision and then to distribute it at a sub-regional and district level. Instead, we have concluded that there are a number of broad criteria for assessing the provision made from a sub-region and district perspective. These criteria are:

- a) the demographic pressure of expected population and household change on the proposed regional housing figure of 478,000 is strongly upward;
- b) the pressures of housing need and affordability are also strongly upward, although the degree of pressure varies with location;
- c) economic factors of employment, jobs/housing balance and the capacity of the development industry need to be kept in mind as a reality check at sub-regional level;
- d) there is an urgency about bringing forward housing to increase the rate of delivery as early as possible;
- e) environmental pressures to do with the water environment and other strategic issues are broadly downward on the housing total, however their incidence varies geographically; and
- f) environmental features and constraints to development can only be considered at a local level.

7.30 With these factors in mind, we have considered the housing provision in each part of the region in the sub-regional Chapter 5. In doing this we have examined the proposed housing provision in each district, proposing changes where these appear justified. In some places these are reductions in view of environmental or other considerations, in others there are increases to reflect local aspirations and economic potential, additional capacity and what is in our view a more robust spatial distribution of growth. Assembling the results of this “bottom up” appraisal produces the table below, in which our recommended provision is compared with that in draft Plan Policy H1.



**Table 7.1**

<b>Area</b>	<b>H1 Draft Plan</b>	<b>H1 Panel</b>	<b>Difference</b>
<b>Beds &amp; Luton</b>	<b>54,500</b>	<b>59,100</b>	<b>+ 4,600</b>
MKSM	43,800	45,800	
Bedford BC	830	1,300	
Mid Bedfordshire	8,270	11,000	
South Bedfordshire	1,600	1,000	
<b>Cambridgeshire &amp; Peterborough</b>	<b>89,300</b>	<b>98,300</b>	<b>+ 9,000</b>
Cambridge	14,700	19,000	
East Cambridgeshire	8,600	8,600	
Fenland	10,100	11,000	
Huntingdonshire	11,200	11,200	
South Cambridgeshire	23,500	23,500	
Peterborough UA	21,500	25,000	
<b>Essex + Unitaries</b>	<b>123,400</b>	<b>124,500</b>	<b>+1,100</b>
Basildon	10,700	10,700	
Braintree	7,700	7,700	
Brentwood	2,900	3,500	
Castle Point	4,000	4,000	
Chelmsford	14,000	16,000	
Colchester	17,100	17,100	
Epping Forest	11,000	3,500	
Harlow	8,000	13,500	
Maldon	2,400	2,400	
Rochford	4,600	4,600	
Tendring	8,500	8,500	
Uttlesford	8,000	8,000	
Southend	6,000	6,500	
Thurrock	18,500	18,500	
<b>Hertfordshire</b>	<b>79,600</b>	<b>83,200</b>	<b>+3,600</b>
Broxbourne	5,100	5,600	
Dacorum	6,300	12,000	
East Hertfordshire	20,800	12,000	
Hertsmere	4,200	5,000	
North Hertfordshire	15,800	7,800	
St Albans	7,000	7,200	
Stevenage	6,400	14,400	
Three Rivers	3,600	4,000	
Watford	4,600	5,200	
Welwyn Hatfield	5,800	10,000	
<b>Norfolk</b>	<b>72,600</b>	<b>78,700</b>	<b>+6,100</b>
Breckland	15,200	15,200	
Broadland	12,200	12,200	

Great Yarmouth	6,000	6,000	
King's Lynn and West Norfolk	11,000	12,000	
North Norfolk	6,400	8,000	
Norwich	10,600	14,100	
South Norfolk	11,200	11,200	
<b>Suffolk</b>	<b>58,600</b>	<b>61,700</b>	<b>+3,100</b>
Babergh	5,200	5,000	
Forest Heath	6,400	6,400	
Ipswich	15,400	20,000	
Mid Suffolk	7,700	7,500	
St. Edmundsbury	8,000	10,000	
Suffolk Coastal	10,100	7,000	
Waveney	5,800	5,800	
<b>East of England Total</b>	<b>478,000</b>	<b>505,500</b>	<b>+27,500</b>

- 7.31 It will be seen that our conclusions from the sub-regional assessment would produce a regional housing total of 505,500 additional dwelling in the period 2001–2021. The adjustments we have made incorporate in our view the maximum that can be achieved to increase the rate of delivery before 2011 in various parts of the region. To go beyond that at this stage would merely involve adding unrealistic numbers to the regional housing total without any real prospect of delivery. We believe this proposal is robust and achievable, and can be delivered without a strategically significant breach of environmental limits or unacceptable harm, provided all development is carried out in accordance with the draft Plan's strategy for sustainable development, modified as we propose. Nevertheless, delivering this level of provision will pose a challenge requiring a strong positive commitment not only from the development industry but also from local planning authorities and from Government in funding infrastructure provision and other support. The wording of our recommended Policy H1 emphasises the approach needed to ensure that the allocations result in completions of new homes and not merely provision in plans.
- 7.32 Despite the increase which we propose in Policy H1, it would not appear to be enough to address in full the demographic and housing issues facing the region over the medium and longer term. As will be apparent from our consideration of the strategic context in Chapter 3, we consider that there is a need for further debate and consideration of the inter-regional aspects of the long term distribution of growth. However, in considering the Spatial Strategy in Chapter 4, we conclude that there is scope, and a need, for the region to provide additional development beyond the year 2011. There is also capacity to do this, but only if sustainable solutions can be found for key issues to do with water supply, wastewater and transport. A strategy to provide for additional growth will also require a proper evaluation of the strategic spatial options. Notable among these are large new settlements, of some 10,000 dwellings or a new town of 25,000 dwellings or more, which need to be considered as part of the review of the Plan to provide for development needs up to 2031.

### Phasing of the housing provision

- 7.33 The draft Plan indicates phasing of the housing provision in only two sub-regions: Thames Gateway/South Essex, where it is broken into two 10-year periods and Cambridge which shows figures for 2001-2016 and 2016–2021. No particular reason is given for the different treatment of these two sub-regions. A number of participants

suggested showing phasing more consistently for all sub-regions. Attention was drawn to the MKSM Sub-Regional Strategy which breaks down the provision for the Bedfordshire and Luton growth locations (like those for Milton Keynes, Aylesbury and Northamptonshire) into 5-year periods. EERA gave its view on how the provision in draft Policy H1 might be phased in its Briefing Paper on the housing numbers (EERA20C, Table 4). This was broken down into two 5-year periods 2001-2006 and 2006-2011 and the 10 years 2011-2021.

- 7.34 While there was support for showing the phasing of the draft Plan Policy H1 provision, there were also some reservations. House-builders were concerned that rigid programming of the figures could impede delivery, while CPRE and others were concerned about greenfield sites being brought forward ahead of brownfield in order to meet phasing quotas. Others made the point that detailed phasing needs to take account of local circumstances and is more appropriate to the LDD level. We conclude that some phasing of the draft Plan provision would be helpful, although it should be indicative rather than a prescriptive target for given amounts of housing to be built within each period. Such indicative phasing would have more meaning than annualised rates which are simply one twentieth of the figure for 2001-2021. The latter takes no account of delivery over the first five-year period, which will have elapsed by the time the RSS is adopted.
- 7.35 We comment at paragraphs 7.19 and 7.20 above on the need to achieve an early increase in the rate of delivery in most parts of the region. EERA's table assumes that completion rates from 2004 to 2006 will be the same as those for 2001-2004, that the residual of current commitments will be developed by 2011 and that the remainder of the provision is provided by 2021. We consider that a more challenging approach is needed, reflecting a rise to a higher rate of delivery (where this is required) as early as possible. The starting point for our proposal for phasing is the latest available information on completions for 2001 to 2004. Thereafter, the basic assumption is that delivery should move to the level required to develop the whole of the remaining provision at an even rate to 2021. In many cases, but not all, the basic assumption means a steep rise in the rate of delivery after 2006 to a new plateau. The only place where we have taken a different trajectory from this theoretically based one is the "MKSM" part of Bedfordshire, where we have taken the phasing from the adopted Sub-Regional Strategy. The result is given in the table below:

**Table 7.2**

<b>Panel H1 figures and 5 year indicative phases</b>					
<b>Area/ District</b>	<b>H1 Panel</b>	<b>5 year indicative phases (dwellings pa in brackets)</b>			
		*due to rounding adjustments, the annual figures may not match the total and county figures. Annual rates are indicative only, and do not take precedence over the H1 total.			
		<b>2001-06</b>	<b>2006-11</b>	<b>2011-16</b>	<b>2016-21</b>
MKSM	45,800	7,250 (1,450)	11,750(2,350)	13,250 (2,650)	13,550 (2,710)
Bedford BC	1,300	850 (170)	150 (30)	150 (30)	150 (30)
Mid Beds	11,000	2,850 (570)	2,700 (540)	2,700 (540)	2,700 (540)
South Beds	1,000	150 (30)	300 (60)	300 (60)	300 (60)
<b>Beds &amp; Luton</b>	<b>59,100</b>	<b>11,100 (2,200)</b>	<b>14,900 (2,980)</b>	<b>16,400 (3,280)</b>	<b>16,700 (3,340)</b>
Cambridge	19,000	3,050 (610)	5,300 (1,060)	5,300 (1,060)	5,300 (1,060)
East Cambs	8,600	2,800 (560)	1,950 (390)	1,950 (390)	1,950 (390)
Fenland	11,000	3,050 (610)	2,650 (530)	2,650 (530)	2,650 (530)
Huntingdonshire	11,200	2,600 (520)	2,850 (570)	2,850 (570)	2,850 (570)
South Cambs	23,500	4,600 (920)	6,300 (1,260)	6,300 (1,260)	6,300 (1,260)
Peterborough UA	25,000	4,650 (930)	6,800 (1,360)	6,800 (1,360)	6,800 (1,360)
<b>Cambs &amp; Peterborough</b>	<b>98,300</b>	<b>20,750 (4,150)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>
Basildon <sup>1</sup>	10,700	1,800 (360)	2,950 (590)	2,950 (590)	2,950 (590)
Braintree	7,700	2,800 (560)	1,650 (330)	1,650 (330)	1,650 (330)
Brentwood	3,500	1,000 (200)	850 (170)	850 (170)	850 (170)
Castle Point	4,000	900 (180)	1,050 (210)	1,050 (210)	1,050 (210)
Chelmsford	16,000	3,950 (790)	4,050 (810)	4,050 (810)	4,050 (810)
Colchester	17,100	4,200 (840)	4,300 (860)	4,300 (860)	4,300 (860)
Epping Forest <sup>2</sup>	3,500	1,100 (220)	800 (160)	800 (160)	800 (160)
Harlow <sup>2</sup>	13,500	1,900 (380)	3,850 (770)	3,850 (770)	3,850 (770)
Maldon	2,400	650 (130)	600 (120)	600 (120)	600 (120)
Rochford	4,600	1,000 (200)	1,200 (240)	1,200 (240)	1,200 (240)
Tendring	8,500	2,000 (400)	2,150 (430)	2,150 (430)	2,150 (430)
Uttlesford	8,000	1,600 (320)	2,150 (430)	2,150 (430)	2,150 (430)
Southend	6,500	1,700 (340)	1,600 (320)	1,600 (320)	1,600 (320)
Thurrock <sup>3</sup>	18,500	4,250 (850)	4,750 (950)	4,750 (950)	4,750 (950)
<b>Essex + Unitaries</b>	<b>124,500</b>	<b>28,700 (5,740)</b>	<b>31,900 (6,380)</b>	<b>31,900 (6,380)</b>	<b>31,900 (6,380)</b>

<b>Panel H1 figures and 5 year indicative phases</b>					
<b>Area/ District</b>	<b>H1 Panel</b>	<b>5 year indicative phases (dwellings pa in brackets)</b>			
		<b>2001-06</b>	<b>2006-11</b>	<b>2011-16</b>	<b>2016-21</b>
Broxbourne	5,600	1,150 (230)	1,500 (300)	1,500 (300)	1,500 (300)
Dacorum <sup>4</sup>	12,000	2,650 (530)	3,100 (620)	3,100 (620)	3,100 (620)
East Herts	12,000	2,500 (500)	3,150 (630)	3,150 (630)	3,150 (630)
Hertsmere	5,000	1,100 (220)	1,300 (260)	1,300 (260)	1,300 (260)
North Herts <sup>5</sup>	7,800	2,550 (510)	1,750 (350)	1,750 (350)	1,750 (350)
St Albans <sup>4</sup>	7,200	1,650 (330)	1,850 (370)	1,850 (370)	1,850 (370)
Stevenage <sup>5</sup>	14,400	1,950 (390)	4,150 (830)	4,150 (830)	4,150 (830)
Three Rivers	4,000	1,100 (220)	950 (190)	950 (190)	950 (190)
Watford	5,200	1,000 (200)	1,400 (280)	1,400 (280)	1,400 (280)
Welwyn Hatfield	10,000	2,400 (480)	2,550 (510)	2,550 (510)	2,550 (510)
<b>Hertfordshire</b>	<b>83,200</b>	<b>18,050 (3,610)</b>	<b>21,700 (4,340)</b>	<b>21,700 (4,340)</b>	<b>21,700 (4,340)</b>
Breckland	15,200	3,250 (650)	4,000 (800)	4,000 (800)	4,000 (800)
Broadland <sup>6</sup>	12,200	2,550 (510)	3,200 (640)	3,200 (640)	3,200 (640)
Great Yarmouth	6,000	1,050 (210)	1,650 (330)	1,650 (330)	1,650 (330)
King's Lynn & West Norfolk	12,000	2,400 (480)	3,200 (640)	3,200 (640)	3,200 (640)
North Norfolk	8,000	1,850 (370)	2,050 (410)	2,050 (410)	2,050 (410)
Norwich <sup>6</sup>	14,100	3,350 (670)	3,600 (720)	3,600 (720)	3,600 (720)
South Norfolk <sup>6</sup>	11,200	2,650 (530)	2,850 (570)	2,850 (570)	2,850 (570)
<b>Norfolk</b>	<b>78,700</b>	<b>17,050 (3,410)</b>	<b>20,550 (4,110)</b>	<b>20,550 (4,110)</b>	<b>20,550 (4,110)</b>
Babergh <sup>7</sup>	5,000	1,450 (290)	1,200 (240)	1,200 (240)	1,200 (240)
Forest Heath	6,400	1,000 (200)	1,800 (360)	1,800 (360)	1,800 (360)
Ipswich <sup>7</sup>	20,000	3,550 (710)	5,500 (1,100)	5,500 (1,100)	5,500 (1,100)
Mid Suffolk <sup>7</sup>	7,500	1,700 (340)	1,950 (390)	1,950 (390)	1,950 (390)
St Edmundsbury	10,000	2,450 (490)	2,550 (510)	2,550 (510)	2,550 (510)
Suffolk Coastal <sup>7</sup>	7,000	2,100 (420)	1,650 (330)	1,650 (330)	1,650 (330)
Waveney	5,800	1,850 (370)	1,300 (260)	1,300 (260)	1,300 (260)
<b>Suffolk</b>	<b>61,700</b>	<b>14,100 (2,820)</b>	<b>15,850 (3,170)</b>	<b>15,850 (3,170)</b>	<b>15,850 (3,170)</b>
<b>East of England</b>	<b>505,500</b>	<b>109,850 (21,970)</b>	<b>130,750 (26,150)</b>	<b>132,250 (26,450)</b>	<b>132,550 (26,510)</b>

- 1 Basildon: the figure for Basildon includes an indicative allowance for about 2,200 outside the Essex Thames Gateway Sub-Region.
- 2 Epping Forest and Harlow: the figure for Epping Forest excludes provision for about 3,000 dwellings at the edges of Harlow in the EFDC area, which is included within the total given for Harlow
- 3 Thurrock: the figure for Thurrock applies to that part of the District within the Essex Thames Gateway Sub-Region but does not imply the imposition of a moratorium on acceptable re-use of previously developed land within existing settlements outside the sub-region.
- 4 Dacorum and St Albans: the figure for St Albans excludes provision (the amount to be determined through the LDD process) for expansion of Hemel Hempstead on land within SADC area, which is included in the Dacorum total.
- 5 North Herts and Stevenage: the figure for North Herts excludes provision (the amount to be determined through the LDD process) adjoining Stevenage and included in the Stevenage BC figure, and any provision adjoining Luton which may emerge from MKSM.
- 6 Broadland, Norwich, and South Norfolk: figures for Broadland and South Norfolk include provision related to Norwich as part of the NPA.
- 7 Babergh, Ipswich, Mid Suffolk and Suffolk Coastal: figures for Babergh, Mid Suffolk and Suffolk Coastal exclude provision on the edge of Ipswich as part of the Ipswich Policy Area (IPA). The Ipswich figure includes provision of at least 15,400 within Ipswich, as well as provision for the IPA within Babergh (up to 600), Suffolk Coastal (up to 3,200) and Mid Suffolk (up to 800).

7.36 We recognise that such phasing may represent a challenge in some locations and that the reality may be different when detailed proposals come to be worked up in LDDs. Nevertheless, we consider it provides a helpful indication of the required “direction of travel”. In this light, we consider that such phasing, expressed as indicative annual rates for each five year period, would be more helpful than the overall annual averages shown in draft Plan Policy H1. We therefore include annualised rates for each 5-year period in our recommended Policy H1. The supporting text should explain that the figures are indicative to be used for monitoring purposes, and should not be regarded as setting precise housing trajectories at local level, which must be a matter for LDDs.

7.37 Although the draft Plan did not contain phasing of the housing provision, draft Policy H3 is entitled “phasing of housing development”. This refers to various aspects of the provision and release of land in LDDs, and mentions aspects of Government guidance and the SS policies. Much of this is either unnecessary or is already covered in the Spatial Strategy, changed as we propose. However, the draft Plan does give rise to a need to consider local phasing of housing development, for example to ensure that sub-regional objectives that transcend local authority boundaries are met. Those parts of this policy that add value are retained in our recommended Policy H2, which also takes account of some improvements suggested by Essex CC.

7.38 It is important that any general phasing of the overall provision is not approached as a form of rationing, whereby if the provision for a given period is delivered early or if annual rates suggested in the draft Plan are exceeded development should be halted or slowed down. Against the background of housing pressures throughout southern England, there are very few places in the region where it would be appropriate to regard the Plan provision as setting an upper limit to growth, if more could be delivered without breaching environmental limits and infrastructure constraints. Indeed, for many places there may be a lot to be said for regarding the annual rates as minima to be exceeded if possible.

### **Affordable housing**

7.39 Housing affordability is widely acknowledged to be a key issue throughout the region, and most participants expect it to be addressed by the RSS. The issues raised are summarised in the Panel Note for Matter 4. Many local authorities welcome the strong support in the draft Plan for seeking significant affordable housing in new development, but there are questions about the relevance or realism of a single regional target. Draft Plan Policy SS13 specifies that 7,200 homes per annum out of the regional housing total

of 23,000 should be social rented housing, and goes on to say that affordable housing must constitute at least 30% of housing supply (presumably meaning the increase in the supply) in all local authority areas. This is coupled with an aspiration to secure at least 40% where housing stress warrants higher provision.

- 7.40 Policy SS13 actually seeks not only 7,200 social rented but also 760 key worker homes, which adds up to some 34% of the total annual provision. The RHS puts the region's need for affordable housing at 11,000 dwellings per year. This would equate to 46% of the draft Plan's annual provision of 23,900. There appears to be an acceptance within the region that this level of affordable housing provision will not be achieved, but it helps to explain the "aspirational" 40% target referred to in draft Plan paragraph 4.63. The regional assessment of need includes key worker and intermediate housing, and an allowance of 1,320 dwellings per annum to meet a backlog of unmet need estimated at 13,200 dwellings. There are, however, conceptual questions about how much of the overall need including key worker housing would be met from new supply and whether it is realistic to plan to reduce the past backlog to nil over 10 years. These arguments are largely academic for the foreseeable future, as in our view there is no practical likelihood of 11,000 dwellings annually or 40% of the total new supply being "affordable" at least for the first half of the Plan period. The reasons for this include the likely availability of funding and the inertia of existing commitments in seeking to move from the current rate of delivery of around 2,000 affordable homes per annum or some 10% of completions.
- 7.41 As several participants argued, the weight of existing permissions and commitments where less than 30% affordable housing has been secured, together with the proportion of small developments and other sites where 30% is not likely to be achieved, means that the other new housing development would have to achieve a much higher percentage to enable the overall 30% target to be met. Moreover the draft Plan's "top down" approach, while it allows for 30% to be exceeded where appropriate, allows no flexibility for a lower percentage to be achieved where local assessments justify it. In practice, as we understand it, while past achievement throughout the region has been well below 30%, authorities have been making Local Plan targets of this order, and commonly 35%, based on local assessments.
- 7.42 The affordable housing target raises the issue of the relationship between market and affordable housing. GO-E and several development sector participants point out that 30% affordable housing out of an annual total of 23,900 dwellings would mean an actual reduction in the amount of market housing provided. Under the approach proposed in draft PPS3, housing market issues as well as affordability would be dealt with more explicitly in RSS, with reference to sub-regional housing market areas. We note that EERA has sought to make a close connection between the draft Plan and the Regional Housing Strategy, and the draft Plan shows the RHS sub-regions at Map 7.1. We share the view that these areas will not necessarily make appropriate areas for the new approach in draft PPS3 although the whole-District based approach of Map 7.1 does have the considerable merits of simplicity and transparency. We also agree that it would be premature to seek to embrace that approach fully at this stage as the PPS has yet to be finalised and the material necessary for sub-regional housing market assessments is not to hand. Nevertheless it is instructive to use these areas to consider some of the housing issues in the draft Plan. For example, EERA's affordable housing study suggests that the affordable housing requirement varies among sub-regions. While in most of them affordable need (as defined for the purposes of that study) is close to the regional average of 29%, only in the London Commuter Belt is it significantly higher (35%) (HSG1, Table 4, page 6).

- 7.43 We conclude that it is reasonable for the Plan to reflect the importance of affordable housing for the region by including an overall regional target and one of around 35% is justifiable. Such a target, if related to a wide definition of affordable housing from all the relevant sources and if applied to new permissions rather than all additional housing over the Plan period, might also be achievable. It should, however, be expressed in broad terms as a regional aspiration and not as a rigid minimum target, so as to allow flexibility for higher or lower targets to be included in LDDs on the basis of local assessments. To translate the percentage aspiration into a “top down” numerical target like the draft Policy SS13 annual figure of 7,200 affordable dwellings per annum can have little meaning for individual Districts. We do not see any benefit in seeking to elaborate or break down the aspirational figure for time periods or different types of affordable housing need as it would be theoretical and not based on any real relationship with targets and provision derived from local assessments. Clearly, however, 35% of our recommended changed Policy H1 totals would represent different amounts in different 5-year periods depending on the local trajectories.
- 7.44 Various aspects of the detail of draft Policies SS13 and H2 attracted comment, particularly on the need for a consistent approach to definitions, and to the need for local assessments. While different forms of affordable housing, and provision for key workers, are seen as especially important in certain parts of the region, we see no justification for the Plan to depart from or embellish the definition included in Government guidance.
- 7.45 Much of draft Plan Policy H2 merely serves to repeat matters that are covered in PPG3 and will continue to be covered in the new PPS3, for example on the need for a range of types and sizes of housing and provision in rural areas. Welwyn Hatfield DC put forward proposals for rewording draft Plan Policy H2 which were broadly welcomed by many participants. While they may be an improvement on the original policy, the WHDC version still says very little which adds a regionally specific dimension to the PPG3/PPS3 guidance. For example, the extent of perceived need for affordable housing in rural areas was regularly and forcefully expressed at the EiP. This is widely recognised as being a key issue for the East of England, given the high house price/income differentials in rural areas, particularly for young people, and there is much concern that resources for affordable housing will be swallowed up by major growth in urban centres. Yet for the Plan, as opposed to the RHS and local development documents, there is nothing distinctive to say. Paragraphs 30 to 33 of draft PPS3 give a more complete framework for addressing rural housing needs in the region than draft Policy H2 (or the WHDC version). As we have stated in several places in this report, the Plan does not need to repeat national guidance for it to apply, but should only include matters where it is necessary to add to or depart from it for regionally specific reasons. In fact it would be counter-productive for RSS to repeat national guidance selectively and with slight differences in language as draft Policy H2 does. Nonetheless, it may be that active pursuit of the options proposed in draft PPS3 would offer local authorities (in consultation with rural communities) a greater range of opportunities to increase provision of affordable housing with less reliance on doing so on the back of general needs housing.
- 7.46 In conclusion we find that new draft PPS3 does leave room for the RSS to set out a regional approach to affordable housing as it relates to the overall objectives of the Spatial Strategy. Our recommended Policy H3 seeks to do this while omitting the material which is covered by national guidance or should be left to LDDs.



## Housing density

7.47 The same considerations as above apply to density and the reference in draft Policy SS16 to a minimum density of 30 dwellings per hectare. Obviously densities can be much higher than this in many parts of the region. In some locations, housing density needs to be very carefully considered in relation to the local character and make up of the area. As Essex ALC pointed out, there is a balance that needs to be found between using land efficiently and providing sufficient space for people and families to lead a healthy and harmonious life. We have considered whether there is, for the East of England, a specific approach to density that needs to be given, either through a minimum value, a range or an average density. We conclude that setting detailed density standards and requirements is something that needs to be done at the local level having regard to all the relevant local considerations and within the framework of national guidance given in PPG3/PPS3 (Annex C). While this needs to be done effectively in order to implement the RSS, and it may be appropriate to monitor the densities of development being achieved, we do not see any regionally distinctive guidance on densities that needs to be added.

## Gypsies and Travellers

7.48 There were a number of calls for the RSS to include specific provisions regarding accommodation for Gypsies and Travellers. Guidance from the ODPM expects RSS to play an important role in addressing the need for Gypsy and Traveller accommodation (HSG20). The concern is that without clear guidance including an allocation of requirements in terms of the number of pitches at district level, the scale of unmet need and the problems that flow from this will not be tackled. Unfortunately representative groups for the Gypsy and Traveller communities did not participate directly in the EiP. There was, however, no real disagreement that the issue needs to be approached urgently on the lines of the Government Circular.

7.49 We recognise that EERA has begun to address the issue and a number of authorities in the region have carried out work on assessments of needs within their area. Whilst there is therefore already some information available, it is by no means complete or in a consistent form across the whole region. Nor was there any doubt that the work necessary to bring together a complete and coherent picture across the whole of the East of England will take too long for this work to catch up and be introduced into the RSS at the changes stage. As well as the survey and technical work involved, there is an essential need for stakeholder involvement and consultation. There is general support for a separate RSS review, in advance of the first complete review, to put in place an up to date strategic framework as soon as possible. GO-E had put forward a possible timetable leading to an EiP in April 2007 and final adoption of the policy in December 2007. Whether or not this timetable is finally adopted, we consider it important that the RSS clearly signals the approach.

7.50 While a single issue review of the RSS framework is the way forward, it is important that matters do not stand still in the meantime. We recognise that a number of authorities are actively addressing the need for provision in their areas, and their efforts should continue. Essex CC proposed policy wording to go into the Plan which we generally agree with and have drawn upon in our recommended Policy H4.

## Overall conclusion and recommendation

7.51 As we have commented elsewhere, the draft Plan policies relating to housing are 95 pages apart in Policies SS13 and H1 to H3, with various additions in sub-regional Polices. Like others we find this unnecessarily complex and confusing. We therefore

propose that a single group of policies (H1 to H4) covers all the relevant matters at a regional level.

**RECOMMENDATION:**

**R7.1** Replace policies S13 and H1 to H3 with the following:

**Policy H1: Regional Housing Provision**

In the East of England as a whole provision\* will be made for the completion of at least 505,500 additional dwellings over the period 2001 to 2021. The regional housing provision will be distributed as follows:

**Table 7.2**

<b>Panel H1 figures and 5 year indicative phases</b>					
<b>Area/ District</b>	<b>H1 Panel</b>	<b>5 year indicative phases (dwellings pa in brackets)</b>			
		*due to rounding adjustments, the annual figures may not match the total and county figures. Annual rates are indicative only, and do not take precedence over the H1 total.			
		<b>2001-06</b>	<b>2006-11</b>	<b>2011-16</b>	<b>2016-21</b>
MKSM	45,800	7,250 (1,450)	11,750(2,350)	13,250 (2,650)	13,550 (2,710)
Bedford BC	1,300	850 (170)	150 (30)	150 (30)	150 (30)
Mid Beds	11,000	2,850 (570)	2,700 (540)	2,700 (540)	2,700 (540)
South Beds	1,000	150 (30)	300 (60)	300 (60)	300 (60)
<b>Beds &amp; Luton</b>	<b>59,100</b>	<b>11,100 (2,200)</b>	<b>14,900 (2,980)</b>	<b>16,400 (3,280)</b>	<b>16,700 (3,340)</b>
Cambridge	19,000	3,050 (610)	5,300 (1,060)	5,300 (1,060)	5,300 (1,060)
East Cambs	8,600	2,800 (560)	1,950 (390)	1,950 (390)	1,950 (390)
Fenland	11,000	3,050 (610)	2,650 (530)	2,650 (530)	2,650 (530)
Huntingdonshire	11,200	2,600 (520)	2,850 (570)	2,850 (570)	2,850 (570)
South Cambs	23,500	4,600 (920)	6,300 (1,260)	6,300 (1,260)	6,300 (1,260)
Peterborough UA	25,000	4,650 (930)	6,800 (1,360)	6,800 (1,360)	6,800 (1,360)
<b>Cambs &amp; Peterborough</b>	<b>98,300</b>	<b>20,750 (4,150)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>
Basildon <sup>1</sup>	10,700	1,800 (360)	2,950 (590)	2,950 (590)	2,950 (590)
Braintree	7,700	2,800 (560)	1,650 (330)	1,650 (330)	1,650 (330)
Brentwood	3,500	1,000 (200)	850 (170)	850 (170)	850 (170)
Castle Point	4,000	900 (180)	1,050 (210)	1,050 (210)	1,050 (210)
Chelmsford	16,000	3,950 (790)	4,050 (810)	4,050 (810)	4,050 (810)
Colchester	17,100	4,200 (840)	4,300 (860)	4,300 (860)	4,300 (860)
Epping Forest <sup>2</sup>	3,500	1,100 (220)	800 (160)	800 (160)	800 (160)
Harlow <sup>2</sup>	13,500	1,900 (380)	3,850 (770)	3,850 (770)	3,850 (770)
Maldon	2,400	650 (130)	600 (120)	600 (120)	600 (120)
Rochford	4,600	1,000 (200)	1,200 (240)	1,200 (240)	1,200 (240)
Tendring	8,500	2,000 (400)	2,150 (430)	2,150 (430)	2,150 (430)
Uttlesford	8,000	1,600 (320)	2,150 (430)	2,150 (430)	2,150 (430)
Southend	6,500	1,700 (340)	1,600 (320)	1,600 (320)	1,600 (320)
Thurrock <sup>3</sup>	18,500	4,250 (850)	4,750 (950)	4,750 (950)	4,750 (950)
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King's Lynn & West Norfolk	12,000	2,400 (480)	3,200 (640)	3,200 (640)	3,200 (640)
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South Norfolk <sup>6</sup>	11,200	2,650 (530)	2,850 (570)	2,850 (570)	2,850 (570)
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Ipswich <sup>7</sup>	20,000	3,550 (710)	5,500 (1,100)	5,500 (1,100)	5,500 (1,100)
Mid Suffolk <sup>7</sup>	7,500	1,700 (340)	1,950 (390)	1,950 (390)	1,950 (390)
St Edmundsbury	10,000	2,450 (490)	2,550 (510)	2,550 (510)	2,550 (510)
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<b>East of England</b>	<b>505,500</b>	<b>109,850 (21,970)</b>	<b>130,750 (26,150)</b>	<b>132,250 (26,450)</b>	<b>132,550 (26,510)</b>

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- 2 Epping Forest and Harlow: the figure for Epping Forest excludes provision for about 3,000 dwellings at the edges of Harlow in the EFDC area, which is included within the total given for Harlow
- 3 Thurrock: the figure for Thurrock applies to that part of the District within the Essex Thames Gateway Sub-Region but does not imply the imposition of a moratorium on acceptable re-use of previously developed land within existing settlements outside the sub-region.
- 4 Dacorum and St Albans: the figure for St Albans excludes provision (the amount to be determined through the LDD process) for expansion of Hemel Hempstead on land within SADC area, which is included in the Dacorum total.
- 5 North Herts and Stevenage: the figure for North Herts excludes provision for up to 8,000 adjoining Stevenage and included in the Stevenage BC figure, and any provision adjoining Luton which may emerge from MKSM.
- 6 Broadland, Norwich, and South Norfolk: figures for Broadland and South Norfolk include provision related to Norwich as part of the NPA.
- 7 Babergh, Ipswich, Mid Suffolk and Suffolk Coastal: figures for Babergh, Mid Suffolk and Suffolk Coastal exclude provision on the edge of Ipswich as part of the Ipswich Policy Area (IPA). The Ipswich figure includes provision of at least 15,400 within Ipswich, as well as provision for the IPA within Babergh (up to 600), Suffolk Coastal (up to 3,200) and Mid Suffolk (up to 800).

Add in supporting text:

\* “Provision” in policy H1 is identified as land identified through the planning process. In order to assist completions at the rates set in the policy, sites forming part of the identified land bank should be genuinely capable of yielding the number of completions expected from them during the period (ie not subject to physical or other constraints likely to prejudice that contribution).

It will assist the objective of early delivery of housing if the planning process identifies land capable of being developed to provide a variety of dwellings (by type and size). It will also assist if housebuyers/occupiers are able to choose from a range of different locations, although this should not be so wide as to compromise the aims of the RSS for a sustainable pattern of development within an objective of urban concentration. Where there is considerable reliance on a small number of locations it will be desirable if steps are taken to widen participation at that site by an appropriate number of housebuilders.

### **Policy H2: Phasing of housing development**

The indicative annual rates shown in Policy H1 will be used for monitoring purposes. They should be taken into account by Local Planning Authorities in keeping under review the phasing of housing provision in local development documents. Any such phasing should also take account of the following guiding principles:

- implementing the priorities of Spatial Strategy (Policies SS1 to SS9);
- the outcome of up-to-date local housing needs assessments;
- the need for co-ordination and consistency of approach between neighbouring authorities in delivering sub-regional objectives; and
- where appropriate, co-ordination of development with necessary transport and other infrastructure provision.

### **Policy H3: Affordable housing\***

Within the additional housing requirement in Policy H1, LDDs should set appropriate targets for affordable housing taking into account:

- the objectives of the RSS;

- local assessments of affordable housing need prepared in accordance with Government guidance; and
- housing market considerations and the Regional Housing Strategy.

At a regional level, delivery will be monitored against an overall regional expectation that some 35% of new housing coming forward as a result of planning permissions granted after the adoption of the RSS should be affordable.

\*For the purposes of this policy the definition of affordable housing is as in Annex A of draft PPS3.

#### **Policy H4: Provision for Gypsies and Travellers**

Local authorities should make provision for sites/pitches to meet the identified needs of Gypsies and Travellers living within or resorting to their area. EERA will work with local authorities and other stakeholders to bring forward an early review to this RSS setting out the strategic framework for such provision, and identifying the requirement in terms of pitch numbers at a district level. Until that review is in place provision in LDDs should be based on the latest available local information on need within the area.

## CHAPTER 8 - REGIONAL TRANSPORT STRATEGY

### Context for the RTS

- 8.1 The debate on the Regional Transport Strategy took place against a background of continuing change and development of transport policies and proposals, some of which rendered elements of the RTS in the draft Plan out of date. The strategy needs to address different components of the strategic transport networks, which are subject to very different planning and funding regimes. The national highways programme has to be reflected in RTS, but it is unclear what influence, if any, RTS can have on establishing, or altering, priorities for that programme. Where regional and national priorities differ the outcome is at best uncertain. For rail the Regional Planning Assessment for the Eastern Region (TRN97) was going on in parallel with the preparation of the RTS (and the EiP), and Route Utilisation Strategies for various parts of the network were at different stages, while there is no strategic planning framework for buses, with competition rather than integration being a key principle. Nor was it possible to secure representation of the bus industry at the EiP, despite the crucial role of bus travel in delivering the RTS objectives for the future.
- 8.2 None of these difficulties is of EERA's making, nor are they specific to the East of England, although they have a particular bearing on the draft Plan because of the timing of its preparation and the nature of strategic transport facilities within the region. As well as picking its way through the procedural landscape set out above, the RTS needs to contend with a number of substantial strategic issues and policy challenges, many of which pull in divergent directions. Some of these are:
- national objectives for addressing climate change and cutting emissions;
  - national and regional objectives for economic growth and encouragement of business, (including businesses which depend on catering for increasing transport demand);
  - objectives for reducing the need to travel, and the pursuit of “smarter” growth, decoupling economic growth from ever increasing movement;
  - objectives for reducing congestion and improving accessibility for all;
  - overloaded and in many places ageing infrastructure and the perception of an “infrastructure deficit”;
  - strong demographic pressures and plans for growth, centred on the Growth Areas and other key locations, with potential for major increases in movement demand; and
  - limited national and local financial resources for investment in transport, compared with potential demands, such that delivery of the strategy is questionable.
- 8.3 Again the above factors are not necessarily specific to the East of England, but they are thrown into particular relief by the region's challenging growth agenda and by its geographical position: as part of the extended Metropolitan region, with several international gateways and traversed by a number of strategic movement corridors, and yet having poor accessibility in parts.
- 8.4 Against the above background it is important not to judge the RTS too harshly. EERA have sought to make the best of a difficult job and would no doubt share the dissatisfaction of others that more has not been achieved in the circumstances. The RTS in the draft Plan is the culmination of a major programme of work, including the series

of studies by Faber Maunsell that informed its preparation (TRN17, 18, 19, 20). A large number of other transport studies, including many assessments relevant to particular locations or corridors, have also fallen to be taken into account. Thus the draft RTS is the view at a particular point in time at which it had to be finalised for publication. After the submission of the draft Plan, many of the wider studies have continued, and have produced further reports, such as the Newmarket to Felixstowe Corridor Study (TRN98) which the EiP was invited to consider. Particular mention also needs to be made of the collaboration between EERA and the Highways Agency on the Strategic Highway Network assessment which produced a series of reports (TRN6 etc.) issued during 2005, and the Regional Planning Assessment (RPA) for the Railway initiated by the SRA and completed by DfT (TRN31/TRN97). Both these exercises were the subject of pre EIP seminar sessions.

### **RTS Objectives**

- 8.5 It may be that the welter of studies and information has itself contributed to a lack of clear strategic focus, which is at the heart of many of the criticisms of the RTS. Some of the arguments and suggestions put forward are:
- a) the objectives in draft Policy T1 need to be better prioritised and more sharply focused, for example on reducing traffic and achieving modal shift;
  - b) the objectives and policies need to be made more regionally specific, and where appropriate sub-regionally specific;
  - c) transport priorities and policies need to be more closely aligned with the spatial strategy of the Plan and its policies for development;
  - d) policies and proposals need to address functionality of the transport system rather than particular problems on the network;
  - e) priorities should be expressed in terms of outcomes rather than a list of schemes as in Table 8.3; and
  - f) the RTS should have fuller or more focused targets to measure its achievement.
- 8.6 Draft Plan Policy T1 sets out RTS objectives in very general terms. Our recommended changed Policy **T1** reflects some of the suggestions put forward and gives a clearer priority for reducing traffic growth and emissions and increasing travel by more sustainable modes, while reflecting the functionality required of the region's transport networks in support of the Spatial Strategy. These objectives then need to be developed through the key policies of the RTS.

### **Traffic growth in the East of England**

- 8.7 Starting with the overall level of traffic in the region and the prevalence of congestion, the output of the HA's modelling of the strategic network was presented at one of the pre-EIP seminar sessions (TRN6, 6A-F). This showed an overall increase in traffic of around 47% over the Plan period, assuming the development provided for in the draft Plan. Of this the Agency stated that the "background" level of traffic growth would be of the order of 45%, suggesting that additional traffic growth attributable to the level of additional development in the draft Plan would appear marginal in terms of its impact on the strategic network. This is supported by the further sensitivity testing which found that a higher level of household growth had a relatively low impact on the overall network (TRN6E). A further broad conclusion of the modelling work was that the "full" RTS network would help to reduce congestion, but with the benefits being felt mainly on the secondary network, with conditions on the trunk road network deteriorating significantly. However, the modelling did not look in detail at the capacity of the local road network.



- 8.8 While the outputs of the strategic modelling may be interpreted as showing the strategy to be broadly robust in terms of the strategic road network, the broader context needs to be considered. A “background” increase of 45% in traffic on the strategic road network over the 20 years to 2021 is incompatible with national aims for reducing carbon emissions. Traffic conditions within some of the region’s urban areas are already highly congested, while economic and household growth in the region, together with current trends in vehicle use, will tend to exacerbate them. The modelling work also shows conditions on the strategic network having deteriorated by the end of the Plan period, suggesting the need for additional investment in it, and/or difficulty in accommodating any further household and economic growth beyond the plan period. In other words, a major 20 year programme of investment in the strategic network would not keep pace with the projected growth in traffic, and there will be a need for new solutions to any further growth beyond 2021.
- 8.9 The perception on the part of EERA, most of the County Councils and many other participants is that congestion and traffic problems are at least in part symptoms of an “infrastructure deficit” which needs to be remedied before accepting new growth. This perception is not universally shared, however. Some environmental groups argue that the problems show current traffic growth to be unsustainable. We take the view that, while there are undoubtedly some situations where highway infrastructure improvements are required, the conclusion is inescapable that a large part of the answer to worsening congestion, to growth and future movement needs, and to the challenge of climate change must be that people will have to use cars less in future. The issue is widely recognised, as is reflected in the attempt to build traffic restraint measures including road user charging into the strategy, through draft Policies T14 and T15. However, we question whether these policies are sufficient to convey the prominence the RTS needs to give to bringing about a major change in travel behaviour.

### **Demand management and changing travel behaviour**

- 8.10 At our request further sensitivity tests were done to see what effect area-wide road user charging (AWRUC) might have on traffic growth on the strategic network (TRN6F). We recognise that care is needed in interpreting this work as the model was not designed for this purpose, but the results nevertheless shed interesting light on the possibilities. They show that for charges of 10p and 20p per kilometre, there are reductions in the number of person trips of 5% and 8% respectively, and significant reductions in average trip lengths (8% and 14%) and in congestion, the time spent in queues (in minutes per vehicle) reducing by 14% and 26%. There are transfers to public transport, but also from strategic to local routes as drivers seek the shortest routes. Perhaps the most interesting finding is that on the “core” RTS network a 10p per km charge produces a greater reduction in congestion than implementation of the additional schemes in the “full” RTS network. While viewing these results with all due caution, we conclude that AWRUC in some form would make a very important contribution to achieving the objectives of the RTS, by reducing road traffic growth and congestion and increasing public transport use. It should also generate some resources and release others for different forms of transport investment. We recommend a strengthened policy (new Policy **T3**) on demand management, supporting the introduction of road user charging.
- 8.11 The need to change travel behaviour is another thing which is not regionally specific, and many will look to national policies and programmes to give a lead. The Government has opened up a debate on road user charging, and the Transport Innovation Fund and other initiatives are being used to develop possible approaches, including a pilot project in which Cambridgeshire is involved. We take the view, however, that AWRUC is only part of a package that will need to include a general

campaign of awareness raising and influencing choice, similar to the messages which are beginning to have an effect on perceptions about waste and recycling, energy and water use. Many parts of this package can be pursued straight away and will help to make people more receptive to initiatives for more sustainable transport and road user and congestion charging when introduced. An essential part of the package is of course improving the alternatives to car use, in the form of public transport, walking and cycling. While these are generally well represented in the draft Plan, eg by draft Policies T7, T12 and T13, we question whether the RTS gives a sufficient thrust to the approach that is needed.

### **Achieving travel change in the East of England**

8.12 In the light of the above conclusions, our recommended new Policies **T2** and **T3** are intended to provide a strong framework for a programme to influence travel behaviour in the region, and for considering road user charging broadly as proposed in draft Plan Policy T15. No-one should be in any doubt about the scale of the challenge involved in this for Government, regional and local authorities, business and the general public. It will involve a considerable cultural change and redirection of resources. For example, while EEDA has often championed infrastructure investment in support of economic growth, it will in future also have an important contribution to make in helping to realise the economic benefits that will flow from more sustainable travel behaviour. We do not have specific information but we suspect the proportion of business time spent “on the road” is at an all time high, and rising. Generally, we perceive a growing recognition of the seriousness of the issues of climate change, traffic growth, congestion and pollution. If the challenge is not met, the aims of the whole RSS will be undermined, and “sustainable development” will appear as a hollow notion. Success, however, will mean not only a lasting solution to some of the problems of traffic growth, but also help to absorb scale of development facing the region without unsustainable consequences. Firm targets are needed to measure achievement of the policies, and these are touched on further in Chapter 11 - Implementation.

### **The spatial focus of the RTS**

8.13 We heard of various examples which show that aspects of the policy approach required are already being pursued by the region’s Local Transport Authorities (LTAs). What they need from the RTS is support and a coherent strategic context within which to pursue appropriate local initiatives, rather than a detailed set of proposals. Within the East of England different policy approaches will be appropriate for different geographical locations. The draft Plan identifies “Regional Interchange Centres (RICs)” (Policy SS6) and draft Policy T10 is a general reference to focusing transport provision to support the spatial strategy. In the sub-regional sections, various sub-regional transport priorities are identified. We consider, however, that the RTS itself can be given a clearer spatial focus. A distinction should be drawn between the priorities for transport within the region’s towns and cities, transport between the urban areas, transport in rural areas and strategic flows through the region, particularly for freight.

### **Urban areas**

8.14 Within the urban areas, and in extensions to them, not only do the greatest concentrations of activity and transport movements currently take place, but the spatial strategy aims to focus new development on them. With large flows over short distances the urban areas are in principle the places where the greatest scope exists for efficient public transport and more use of walking and cycling. In this, and with the emphasis on reducing the need to travel, the spatial strategy is implicitly prioritised for a shift towards more sustainable transport. By the same token, however, it is essential that

concentrated efforts are made to bring about that shift, and that these efforts are successful, in order to avoid increases in congestion and pollution and towns grinding to a halt, and to ensure sustainable delivery of growth. Our recommended new Policy **T4** brings out the priority for this within the RTS.

- 8.15 The urban areas themselves vary across the region. In the London Arc Sub-Region and in Thames Gateway a large number of closely spaced, medium sized towns provide a multiplicity of origins and destinations and very dense but diffused patterns of movement between them. Close to the London boundary these patterns extend into multiple destinations in outer London, in contrast to the concentrated flows to central London on the main rail corridors. Such movements may be difficult to serve by public transport, and car use is prevalent on congested local roads. The difficulties in achieving change were summed up in a comment from HCC about the resentment caused among people sitting in traffic jams alongside empty bus lanes. Apart from the obvious comment that the people in the traffic jams have still to get the message, this in our view underlines the need for area wide approaches involving integrated packages of different measures.
- 8.16 Further out in the region the urban areas tend to be more free standing towns, and the key issue is one of connecting town centres and a relatively small number of other attractors such as employment areas and schools to the adjacent and outlying residential areas. These situations lend themselves to packages of complementary measures to influence modal shift. It is also important that new peripheral development is focused on sustainable links with the rest of the town, and not on easy connection to the inter-urban highway network. In truly sustainable urban extensions, the new development should be an exemplar and a catalyst for more widespread growth in sustainable urban transport. For this reason, it is important that policies for changing travel behaviour are focused not only on the RICs, but specifically on all the Key Centres for Development and Change identified in the Spatial Strategy. Our recommendations include reflecting sub-regional priorities for the different urban areas in the prioritisation of future transport investment under new policy **T15**.

### **Inter urban transport**

- 8.17 Inter urban movements bring into play the draft Plan policies for the strategic networks and Regional Interchange Centres (RICs). The RICs, though generally supported, were also the subject of criticism and uncertainty as to their meaning. The designation of an “interchange centre” implies a specific location for connections between routes or modes of transport. However, draft Plan policies SS6 and T2 refer to enhanced public transport “to, from and within” the RICs, implying a whole-town approach. The transport issues within urban areas are not confined to those identified as RICs and should in our view be addressed in all the Key Centres of Development and Change. This is covered above and in our recommended policy **T4**. The inter-urban role for RICs is as nodal points on the strategic networks and for interface between local urban systems and wider regional transport links. For this role we consider the RICs appropriate, although consideration should be given to changing the term to “Regional Transport Nodes” which may more clearly convey their purpose. The RICs listed in the draft Plan appear to be the right ones but we would suggest the addition of Brentwood. This town is located close to a major nodal point on the strategic highway network, as well as having important public transport connections.
- 8.18 On the rail network the priorities from the national perspective, as seen through the RPA, focus strongly on the radial routes into London. Equally, it is crucial for the railway system that the Plan objectives for balancing housing growth with employment rather than increased commuting are met. There is, however, plenty of capacity for off-

peak and contra-peak growth, the main issue for realising this being better access and interchange with other modes. This means that rail investment priorities can support the Plan strategy based on concentration of development in urban areas and the network of RICs, but only on the existing predominantly radial network. This will need to be complemented by efficient inter-urban bus and coach services where rail is not available. Our recommended new Policy **T5** therefore gives priority to investing in and supporting the role of the rail network in connecting key centres within the region to London and other centres outside the region, and complementing this with viable alternative public transport where rail is not the best option.

- 8.19 Despite the strong focus on the radial railway routes noted above, rail pressure groups and some local authorities in the region sought for more priority to be given to East-West linkage on the rail network. In the East Anglian part of the region this is recognised in the Newmarket to Felixstowe Corridor Study (document TRN98) and reflected in the priority we identify for rail links to the region's ports (recommended policies **T10** and **T11**). The other aspect of East-West rail, which seeks to promote a rail corridor in the Oxford to Cambridge Arc, is more problematic. West of Bedford the rail service to Milton Keynes operates, and improvements and possible extension to Aylesbury and Oxford are for consideration in the context of the MKSM Growth Area strategy. Between Bedford and Cambridge, however, there appears little prospect of establishing a new heavy rail link in the foreseeable future, and bus services are likely to remain the most viable option. Despite Bedford's role in the MKSM growth strategy and the considerable growth focused on the Cambridge Sub-Region, neither the direct traffic between them nor general demand in the relatively empty terrain, particularly east of Sandy, would appear to support a priority for heavy rail investment. We do not therefore suggest that the RTS should require safeguarding for such a route at this time. It is possible that this would need to be reconsidered in the review of the RSS if it came forward with additional major growth in this corridor.
- 8.20 As the draft Plan recognises, the inter-urban road system will continue to be of key economic importance for the region and much of its future development. In general a large proportion of the individual schemes prioritised by Table 8.3 relate to improvements to the inter-urban road system. In many cases, particularly where these are by-passes, the aim is primarily environmental improvement or reducing congestion, or improving the accessibility of locations for development or regeneration, rather than simply increasing traffic capacity. Nevertheless, many of the road improvements carried out and planned within the region also have the effect of increasing capacity, and hence the attractiveness of vehicle use compared with alternatives. A difficult balance needs to be drawn between remedying problems in the network and avoiding encouraging unsustainable traffic growth. The EiP was not equipped to apply this balance to the individual schemes listed in Table 8.3, but it is reflected in our recommended Policy **T6** which in turn should influence priorities for investment in future. Similar considerations apply to the management of local road networks in the region, and this is reflected in our recommended new Policy **T8**.

### **Rural transport**

- 8.21 The EiP heard at various points about the particular transport needs of rural areas, which are very different from those of the towns and cities. Although the draft Plan refers to the needs of rural areas in Policy SS9, we consider that transport issues and priorities for the rural areas should be covered more fully in the RTS. The approach for rural areas needs to mirror the emphasis on moving to more sustainable transport for urban and inter urban movement. However, the much lower density of rural movement patterns means that high frequency public transport will seldom be viable, and private car use will remain essential in many situations. The RTS needs to reflect the priorities

for sustainable connections between rural settlements and the market towns and service centres on which they depend, as well as objectives for improving accessibility for remote areas and groups without the use of a car. This represents a continuation of approaches already being pursued by most of the Local Transport Authorities. We recommend an appropriate new Policy **T7**.

### **Walking and cycling**

8.22 Although walking and cycling are to some extent covered in our revised spatial priorities for transport, we consider they are of sufficient importance to merit a separate policy as well. As it stands, however, draft Plan Policy T12 says very little about the role for walking and cycling in a sustainable development strategy. As well as playing a role in the transport system, pedestrian and cycling networks can provide important linkages for recreation and access to the countryside and urban greenspace. We recommend an amplified policy at **T9**.

### **Freight movement, ports and airports**

8.23 Freight movement is another area where work was in progress in parallel with the draft Plan. In particular, EEDA's Freight Scoping Study (TRN79) and the rail Freight RUS had not produced results in time for the EiP. The need for the region to provide at least one strategic rail freight interchange (RFI) to serve the northern quadrant of London and destinations within the region was identified by the then SRA in March 2004. The options for locating such a facility are limited, given its locational requirements in relation to the rail and strategic highway networks. Strategic RFIs may also present opportunities on previously developed land which is unsuitable for other forms of development such as housing. It would be inappropriate, on the basis of the evidence before us, to settle for one particular location, but it is in our view important that the Plan states the requirement clearly. This and the unanimously supported priority for investment to help increase the proportion of freight moved by rail is reflected in our proposed Policy **T10**.

8.24 In relation to the safeguarding of wharves, concerns were expressed that, on the one hand freight wharves need to be protected from demand for other uses, particularly housing, for which waterside sites are sought after and on the other hand safeguarding for freight use should not blight sites where such use would be unsustainable or unrealistic. We also recognise that defining locations or specific criteria for safeguarding would require a detailed study. In our view the phrase "well located" provides the flexibility needed in a strategic level policy, and our recommended policy **T10** retains it.

8.25 We heard that a national review of ports policy was in prospect once specific decisions on major proposals before the Secretary of State were taken. Meanwhile it was unclear how regional transport priorities should deal with port-related transport demands, other than by the broad approach of draft Plan Policy T4. During the EiP, affirmative decisions on the three key proposals in the region at London Gateway, Harwich (Bathside Bay) and Felixstowe emerged. Each has specific implications for transport investment in which funding by the port developer has an important part to play. We consider draft Plan Policy T4 remains generally appropriate, but our recommended new Policy **T11** adds emphasis to the priority for maximising the proportion of port traffic carried by rail.

8.26 For airports the national policy framework is set by the Air Transport White Paper (ATWP), with an unclear role, if any, for RTS in interposing regional priorities between that framework and the proposals of operators. The EiP took place against the background of strongly held views of some participants against the ATWP proposals.

As well as more locally based objections to airport expansion, there was a broader view that growth of air traffic as forecast in the ATWP is utterly inconsistent with the UK Sustainable Development Strategy, and a lack of confidence that reliance on international carbon trading would meet the case. No-one had an answer to this concern. EEDA and a number of other participants took the view that the draft Plan should be amended to support more fully the ATWP policy and the emerging proposals of airport operators. From the outset it has been clear to us that there is no role for the RSS in determining the rate of air traffic growth or runway provision at the region's airports. Decisions on that, and resolving any policy conflicts attendant on those decisions, remain for Government.

- 8.27 What is relevant to the RTS, however, is that the provision of surface transport access to the airports should be consistent with and complementary to the wider aims of the RTS. In detail, studies by BAA for surface access proposals in connection with the expansion of Stansted Airport are at an early stage. There is a general view that until this work has progressed the RSS cannot include specific proposals. Similarly at Luton Airport detailed access proposals will be developed in connection with the airport Master Plan. We accept that there are limits to the depth to which the RTS can deal with surface access to both airports, but it remains important for it to set a context of strategic priorities. Uppermost among these is for surface access arrangements to dovetail effectively with regional objectives for changing travel behaviour. Our recommended Policy **T12** strengthens draft Plan Policy T5 in this respect.

### **Standards for public transport accessibility and parking**

- 8.28 Draft Plan Policy T13 sets out minimum standards for public transport accessibility in different types of areas within the region. The current reality in many locations is that public transport services are at much lower levels or even non-existent. For the rural areas we note that the percentage of households within walking distance of an hourly service is not yet known, but it may be very low in remote areas. For many, a bus service on certain days of the week may be the most that can be realistically provided. In these situations, as elsewhere, the key to a better service and greater use of it may have more to do with dependability of the service and reliability of information about it than with sheer frequency. In the light of the discussion we do not see any firm alternative to the levels set out in the table, but the policy needs to indicate flexibility in applying them in order to deliver a targeted and well used service as widely as possible. Our recommended changed Policy **T13** reflects this.
- 8.29 Parking controls have an important part to play in the overall approach to achieving the change in travel patterns that needs to be pursued through the RTS. Parking standards need to be applied with care, however, having regard to other objectives such as maintaining the vitality and viability of town centres. There also needs to be a concerted approach towards standards in centres which may be in competition with each other, both within the region and across boundaries, particularly with Greater London. Draft Plan Policy T16, in seeking to apply the standards of PPG13 as a basic level with more stringent controls in urban centres with good public transport takes broadly the right approach. Our slightly changed version at recommended Policy **T14** emphasises the role of parking controls as part of a wider package of measures. Other measures such as workplace parking charges may also be part of such packages, and we would support retention of the supporting text in draft Plan para 8.89 on this aspect.

### **Transport investment priorities**

- 8.30 Many comments and criticisms focus on draft Plan Policy T17 and the schemes listed in Table 8.3 of the RTS. As well as the issues raised about the merits of particular schemes or the priority they should have, and suggestions for additions to or deletions

from the list, there were broad arguments about the scheme-specific nature of the approach. The guidance in PPS11 calls for the RTS to identify investment and management priorities in broad terms only and focus on general outcomes (PPS11, Annex B, paragraph 19). Particular schemes should be identified only where there is already a clear commitment to deliver the scheme, confirmed by DfT or the relevant national transport delivery agency. There were, however, indications from GO-E that the Department was thinking about a more nuanced approach in which other specific regional schemes could play a part.

- 8.31 The Sustainability Appraisal/SEA raised a difficulty with the scheme-specific nature of the RTS, in that it had not been possible for the appraisal to scrutinise the individual schemes from an SEA viewpoint (EERA3, SA Report, page 10). The EiP was under a similar difficulty. Despite the wealth of documentation and detailed submissions on some proposals, most of the schemes have not been examined by the EiP in the degree of detail necessary to create a clear commitment to them. We are not in a position to pass judgement on the transport and economic case or the environmental impact of every specific scheme. It follows that mention of schemes in the RTS could not be taken to convey approval or a presumption about the outcome of proper assessment and determination of specific proposals. If included at all, they have to be seen as illustrations of the kind of measures required to meet RTS objectives and priorities.
- 8.32 It is important that this limitation on the status of any proposal mentioned in the RTS is well understood. There were various submissions, mainly from local authorities, calling for specific schemes often of a local nature to be added to the list in Table 8.3, apparently in the expectation that this would make their realisation more certain. Conversely there were objections to other schemes, perhaps most notably the proposed A47 improvement west of Great Yarmouth and the Norwich Northern Relief Road, based on the fear that the priority given in the draft Plan would over-ride the proper protection of internationally designated environmental sites. We do not consider either of these views to be substantiated but they illustrate the problems of expressing investment priorities in terms of specific schemes rather than broader outcomes. We note that in many cases the priorities in Table 8.3 are expressed in terms of outcomes or options, but in a large number of others they appear to relate to specific proposals. Draft Plan Policy T17 includes the qualification that the list in Table 8.3 would be reviewed from time to time, and there are other caveats in the supporting text. We conclude, however, that there is still too direct a link between the policy and the specific schemes in the Table, which appears to have the status of policy.
- 8.33 There was another important dimension to the question of the status of schemes in the RTS. RTS are supposed to set priorities for LTPs and yet the Regional Funding Allocation (RFA) process for determining regional transport funding priorities was going on in parallel with the EiP and not directly influenced by it. This was a parallel process in every sense, since the criteria for prioritisation, though similar in some respects, were not identical to those of the RTS, the list of candidate schemes was not identical with that of the RTS and where schemes were included in both lists the status and timing accorded to them was not necessarily the same. EERA helpfully provided a set of tables (EERA34C) reconciling Table 8.3 with the treatment of schemes in the RFA prioritisation. Apart from the obvious differences related to categories of projects included in Table 8.3 which do not fall to be funded through the RFA (chiefly revenue spending and studies), there are numerous detailed differences, both in the status or timing accorded to schemes and in some cases whether they are prioritised at all in the RFA.
- 8.34 The EiP did not have an opportunity to debate these differences or what to do about them. Region's advice to Government (EERA35) contains much interesting advice that

it would have been useful to consider. For example the spatial perspectives in Section 6 of the document contain elements of the kind of spatial prioritisation which we have suggested above within the RTS. The RFA is not confined to transport but includes economic development and housing, reflecting to some degree the synergy which we believe is required for the RSS to be effective as a whole. Chapter 7 of the advice points towards future more integrated delivery of investment for growth locations, and to a strategic infrastructure programme bringing together different funding streams focused on transport corridors. Whatever becomes of these particular ideas, we find they indicate a more coherent basis for determining strategic investment priorities for transport in the region in future. This points in the same general direction as our approach towards implementation discussed in Chapter 11 and our recommended new policies **IMP1** and **IMP2**.

- 8.35 For the present, however, the conclusion we reach is that draft Plan Policy T17 should be changed as a self contained statement of priorities for transport investment in the East of England, in terms of the objectives and policies of the RTS and sub-regional policies, and expressed in terms of the outcomes sought rather than specific schemes. Table 8.3 in its present form should be deleted. Instead, a new appendix to the Plan should list the programme of currently approved and prioritised transport projects in the region. That list should be based on committed national highway projects, committed or planned national rail investment in the region, projects funded through the RFA, and other funding regimes such as Growth Areas Funding and the Transport Innovation Fund, so that all the regionally significant transport investment programmed for the region is identified. A useful refinement would be to include indicative total costs and identification of any additional funding sources such as developers.
- 8.36 Our recommended Policy **T15** reflects the above conclusion. We have not attempted to construct the proposed appendix in detail. It is clearly subject to variation over time, and the most up to date information available will need to be included at the time the RSS is finalised. For example, even an apparently committed national scheme like the M11 widening north of Junction 11 indicated as priority “X” in Table 8.3 now needs to be amended, and there may be further changes to the status of rail schemes since the comments on Table 8.3 provided by the SRA. The list of schemes to be taken from the RFA may also have undergone amendments and there are likely to have been other announcements since the close of the EiP.

## RECOMMENDATION:

**R8.1** Recast and replace the RTS Policies T1 to T17 with the following revised set of policies. The new Policies cover the RTS objectives (Policy T1 *replacing draft Plan Policy T1*), behavioural change and demand management (T2, and T3 *replacing T15*), broad spatial priorities for transport in the region (T4, T5, T6, T7 *in part replacing draft Plan Policies T2, T6, T7, T8, T9, T10, T11, T14 in part*), policies for management of local roads, walking and cycling (T8 and T9 *replacing draft Plan Policies T14 in part and T12*), movement of freight (T10 *replacing draft Plan Policy T3*) ports (T11 *replacing draft Plan Policy T4*), airports (T12 *replacing draft Plan Policy T5*), public transport accessibility and parking standards (T13, T14 *replacing draft plan Policies T13 and T16*), and the transport investment programme (T15 *replacing draft Plan Policy T17*).

### **Policy T1: Regional Transport Strategy Objectives**

In implementing the overall vision and objectives of the Regional Spatial Strategy, transport policies will seek to meet the following primary regional objective:



- a) to contribute to a reduction in the region's climate change emissions by reducing growth, and ultimately achieving an absolute reduction in traffic on the region's road system.

In addition the RTS has the following objectives:

- b) to increase the proportion of the region's movement carried by public transport, walking and cycling;
- c) to provide access to areas of new development and regeneration;
- d) to provide safe, efficient and sustainable access between homes and workplaces, schools, town centres and other key destinations;
- e) to provide for efficient movement of passengers and freight through the region from the international gateways; and
- f) to reduce the transport intensity of economic activity.

### **Policy T2: Changing travel in the East of England**

Government will work with EERA, EEDA, local authorities, transport providers and other organisations to implement a concerted programme of policies and measures aimed at bringing about a significant change in travel behaviour in the region and a shift towards greater use of sustainable forms of transport. In addition to implementing other policies of this RTS such measures will include:

- awareness raising on the real costs of unsustainable travel, and the benefits and availability of alternatives;
- fuller application of workplace, school and personal travel plans, not only for journeys to work but for business travel and transport operations;
- educational programmes;
- investment in business initiatives, including but not limited to tele-working and other means of decoupling economic activity from the need for travel; and
- investigation of ways of providing incentives for more sustainable transport use.

### **Policy: T3 Managing traffic demand**

Demand management measures for highway use will be pursued to effect a reduction in road traffic growth. Road user charging, in the form of urban congestion charging, selective or area wide charging on the strategic network will be considered as part of an integrated approach in support of the objectives of this RTS. In addition to being consistent with any national technical standards and guidelines, any road user charging scheme within the region should:

- be matched with promotion of sustainable alternatives to vehicle use;
- be designed so as to avoid disadvantaging the region's rural communities and other regeneration areas dependent on road access; and
- produce resources for investment to support the objectives of this RTS.

### **Policy T4: Urban transport**

Within urban areas, particularly in the Key Centres for Development and Change identified in Policy SS4, LTPs, LDDs and other measures will seek to bring about a significant shift away from car use to greater use of public transport, walking and cycling. This will be achieved through any or all of the following types of measures, in combination as appropriate to the local circumstances:

- ensuring that urban extensions and other major developments are linked from the outset into the existing urban structure through safe, well designed pedestrian and cycling routes and a high standard of modern public transport;
- capitalising on opportunities provided by new development to achieve area wide improvements in public transport services, footpaths and cycle networks;
- promotion of public transport use through quality partnerships and other measures to provide enhanced services, improved interchanges, access, visibility and travel information, and traffic management measures prioritising road-space for buses; and
- improvements to local networks for walking and cycling including increasing the attractiveness and safety of the public realm.

#### **Policy T5: Inter urban public transport**

Improvements sought to inter-urban public transport will focus on the Regional Transport Nodes identified on the key diagram. These are:

Basildon, Bedford, Brentwood, Cambridge, Chelmsford, Colchester, Harlow, King's Lynn, Luton/Dunstable, Ipswich, Norwich, Peterborough, Stansted, Stevenage, Southend, Thurrock and Watford.

The priority will be to facilitate movement between major centres within the region, access to London and to national networks and, within the Regional Transport Nodes, interchange between modes and integration between strategic and local networks. Particular measures will include:

- improved access, particularly by sustainable local transport, to main line railway stations;
- support for investment to improve rail services to key centres and for improved comfort and capacity on crowded routes, in the light of priorities identified in the Regional Planning Assessment for the Railway and Route Utilisation Strategies;
- support for high quality interurban bus/ coach services, particularly on east-west links and in other situations where rail is not available, co-ordinated with rail and local public transport; and
- strategic Park and Ride targeted at reducing car use for inter-urban travel.

#### **Policy T6: Strategic Road Network**

The strategic road network identified on the key diagram will be improved, managed and maintained in accordance with the following key priorities:

- national priorities for maintaining the strategic function of the region's Motorways and Trunk Roads so as to tackle congestion without inducing unnecessary additional traffic;
- access to key centres within the region in support of economic development and regeneration objectives, particularly in Strategic Employment Locations and Priority Areas for Regeneration;
- the efficient movement of freight which cannot be carried by rail or waterway so as to minimise its impact on the environment and local transport networks;
- improving safety and efficiency of the network and reducing its environmental impact; and
- complementing measures for managing traffic demand under Policy T3.

**Policy T7: Transport in rural areas**

In the rural areas priority will be given to providing sustainable access from villages and other rural settlements to market towns and key service centres (see Policy SS4). Measures will include:

- support for public transport where viable to meet and, where possible, exceed the minimum accessibility levels set out in Policy T13 and Table 8.1;
- innovative approaches to local transport provision including community based transport initiatives, travelling service delivery to remote areas and measures to assist people without the use of a vehicle; and
- support for increasing the availability and use of communications technology to reduce dependency on travel in remote areas.

**Policy T8: Management of local roads**

The local road network will be managed so as to complement the aims of Policies T2 to T7, and with the following priorities:

- reducing the growth of traffic and its environmental impact;
- facilitating safe and efficient public transport, walking and cycling;
- providing efficient vehicular access to locations and activities requiring it, in particular in areas where regeneration is dependent on improved access; and
- improving safety and alleviating congestion.

**Policy T9: Walking and cycling**

Provision for walking and cycling will be improved and developed as part of a co-ordinated strategy for achieving the RTS objectives. Pedestrian and cycle networks will be managed to maximise their contribution to access to work, schools and town centres, and to provide access to the countryside, urban greenspace and recreational opportunities. Support will be given to completion by 2010 of the National Cycle Network in the region and linking it with local cycling networks to form continuous routes.

**Policy T10: Strategic movement of freight**

Priority will be given to the efficient movement of freight by all modes while seeking to increase the proportion of the region's freight movement carried on rail and by water. In particular:

- high priority will be given to measures for improving rail freight capacity on routes leading to the region's ports;
- provision will be made for at least one strategic rail freight interchange within the East of England, at a location with good access to the strategic rail routes and highway network; and
- existing well-located wharves and facilities for rail and water freight interchange should be safeguarded for future use, and improved provision made in locations with good road and rail access to end users.

**Policy T11: Ports**

Access to the region's ports will be managed and enhanced to support development as and when it is approved and to enable the ports to contribute to national and regional objectives in relation to economic growth and regeneration. In accordance with Policy T10, a key priority will be to maximise the proportion of freight, particularly longer distance freight, travelling to destinations beyond the region by rail as opposed to road.

**Policy T12: Airports**

Access to the region's airports will be managed and enhanced to support development as and when it is approved and to enable the airports to contribute to national and regional objectives in relation to economic growth and regeneration. A key priority will be to ensure that airport surface access facilities reinforce and help to contribute to the shift to more sustainable travel sought by the RTS objectives.

**Policy T13: Public transport accessibility**

Public transport provision will be improved and its use encouraged throughout the region by increasing the accessibility of an appropriate level of service to as high a proportion of households as possible. Table 8.1 provides a guide as to the minimum accessibility levels to be aimed for.

**Policy T14: Parking**

Parking controls will be used as part of the packages of measures for influencing travel change under the policies of this RTS. Demand-constraining maximum parking standards will need to be set locally having regard to the progress of measures to improve public transport accessibility, walking and cycling, and to the need for a concerted approach between neighbouring centres. The standards in PPG13, as set out in Table 8.2, will be treated as a maximum, with more stringent standards no higher than 70% of PPG13 standards being applied in RTNs and in Key Centres for Development and Change in line with progress towards greater public transport provision.

**Policy T15: Transport investment priorities**

Investment in transport schemes in the region will be prioritised according to the contribution they make to achieving the RTS objectives in Policy T1, and to achieving the priorities and objectives set out in (a) Policies T2 to T14 and (b) the transport priorities contained in the policies for sub-regions and Key Centres for Development and Change (as recommended in Chapter 5). Revisions of Local Transport Plans and future prioritisation exercises for regional transport investment should be based on these priorities. Appendix XXX lists the regionally significant transport investment currently programmed for the region, which will be subject to review from time to time.

## CHAPTER 9 - ENVIRONMENT, WATER, RENEWABLE ENERGY

### Background

- 9.1 The sub-regional sections of the draft Plan are inconsistent in their coverage of environmental issues. Some contain environmental policies, others do not. This led to many calls for more coverage of environmental issues within the sub-regional sections. Such suggestions could only result in considerable lengthening of an already overlong plan with similar issues being covered many times. In our view this would be undesirable. Many such calls appeared to be based on misunderstanding about the status of Chapter 9 and how far it applies across the sub-regions. For example, some did not realise that it applied region-wide, believing that it only related to the “generic policy areas” outside the sub-regions defined on the key diagram. We strongly emphasise that the plan’s environmental policies should be entirely contained within an over-arching chapter rather than some aspects being covered at a finer level of detail on a sub-regional or more local basis. This, coupled with our suggestion elsewhere that the environmental policies come immediately after the Spatial Strategy, should give them the more central status and focus that they merit.
- 9.2 In discussion of environmental issues throughout the EiP there was a recurring tendency for participants to urge that a very wide range of general and particular issues, reports, studies and non-statutory strategies and policies be given recognition or mention in the plan. While some of these documentary sources have helped our understanding of the regional issues and will provide useful inputs to future work at a different scale from the RSS, we have not been convinced that specific mention in the plan is normally required. The task for the East of England Plan is to strike the right note for a regional spatial strategy, not to reiterate national policy, usurp local policy to be developed in LDDs or attempt to describe work being undertaken by other agencies that may or may not be directly related to the Plan and its specific statutory role.

### Policy ENV1: Environmental infrastructure

- 9.3 We support the widespread view that the term “green infrastructure” best describes the subject matter of this policy since “environmental infrastructure” can be taken as having a narrower meaning limited to man-made works required for engineering/managing certain aspects of the environment. We also agree with participants that the policy needs to emphasise the importance of identifying and protecting green infrastructure (in its widest sense) throughout the region, although this will apply in a particular sense in and around growth towns.
- 9.4 While the presence of green infrastructure may well make a “contribution to economic objectives” we find it inappropriate to identify that as a separate policy aim as it should be valued mainly for its contribution to “quality of life” in the broadest sense. However, as the discussion brought out in many places, pieces of green infrastructure, particularly the Broads (with status equal to a National Park), the AONBs, forests and other major features, can play an important part in the regional and local economy through tourism and their use as recreational resources. As such they make a broader return on the investment that has to be made in protecting or enhancing their environmental value. This is consistent with the approach, strongly supported by English Nature and the Countryside Agency, of regarding such features as assets. While their care still needs to be strongly focussed on their environmental value, this more holistic approach is reflected in our proposed revised Policy ENV1 (**R9.1**).

- 9.5 Some participants seek more specific identification of major green infrastructure of regional significance, but others stress that more work would be required to achieve this in a comprehensive way. We agree that a finalised list of regionally-strategic green infrastructure may be hard to conclude at present but from what we heard we consider it clear that certain areas and some particular projects can already be identified as meriting identification as vital elements of such a network. An example of this would be The Brecks, where we consider there to be an important need to provide secure funding and administrative arrangements (building-on and developing the work begun by the Brecks Countryside Project) to enable this sensitive and extensive area to be effectively managed on a long-term footing. Otherwise there is a danger of conflicts developing between the national and international ecological importance of the local habitats and the growing recreational pressures likely to arise from the significant regional growth points at Thetford, Norwich and Cambridge.
- 9.6 We therefore identify a preliminary list of regionally-strategic green infrastructure locations and projects in our recommendation (**R9.1**) below, although we recognise that this may not be definitive and should remain open to suggestions for amendment through the Secretary of State’s Changes and subsequent reviews of the Plan.
- 9.7 Our recommendation also clarifies and simplifies the policy by reducing the number of bullet points and deleting repetitious material better included in other ENV policies (eg the matters in the penultimate bullet point are covered by ENV3).
- 9.8 We do not give detailed recommendations about the supporting text at paragraph 9.4. However, we recommend the inclusion of:
- a fuller definition of green infrastructure (perhaps along the lines of the definition adopted by the TCPA which received considerable support), stressing its multi-faceted importance in landscape, ecological, and recreational terms and recognising that while multi-functionality is a desirable aim there can sometimes be tensions between these objectives;
  - recognition that the need for identification, provision and management of green infrastructure applies region-wide, not only in areas targeted for growth; and
  - a statement that identification of green infrastructure networks at the local level has to be founded on surveys of existing provision and future needs.

### **Policy ENV2: Landscape character**

- 9.9 Much of the debate about this policy arose as a result of its slight confusion between (a) the specific statutory responsibility to protect nationally designated landscapes and (b) the region-wide need to provide a spatial framework for recognising and conserving the constituent elements of the East of England’s many and distinctive countryside character areas identified on Map 9.1 of the Plan. We recommend clearer separation of these two distinct, though complementary, policy aims under the revised title “landscape conservation” (**R9.2**). Beyond this we consider the policy largely satisfactory in principle, albeit in need of editing to sharpen its content.
- 9.10 In our view the task described under (b) above is far more important than inviting local authorities to develop a network of non-statutory designations which some sought to have reflected in ENV2. The latter merely introduces confusing multiple tiers of protection and non-protection whereas working up a less artificially value-laden framework for countryside character area policies recognises the unique qualities and distinctiveness of all rural areas which (dependent upon local circumstances) need to be maintained, enhanced, repaired or managed through periods of change.

9.11 We have little comment on the supporting text, although in our view paragraph 9.8 gives an unclear and partially misleading summary of paragraphs 21-23 of PPS7, so it would be preferable to include only a simply cross-reference to this national policy advice. There was some enthusiasm among participants for reference to be made to the planned work on a Regional Landscape Framework. Although this has only reached a very early stage we see some merit in a brief reference to this. We also support suggestions that it would be helpful to refer to the Broads Management Plan and the AONB Management Plans, pointing up any interactions between these processes and the Plan.

### **Policy ENV3: Biodiversity and earth heritage**

9.12 In order for the Plan to make a clear statement about these issues we consider that the first sentence of ENV3 should be set on its own as a distinct statement about designated international and national sites. This should be linked with cross-references to Parts I and II respectively of ODPM Circular 06/2005 at the beginning of the supporting text through a redrafted paragraph 9.10. A new section then needs to be introduced to the policy dealing with the conservation of habitats and species outside designated sites and the conservation of species protected by law, linked with cross-references in the supporting text to Parts III and IV of the Circular.

9.13 In our view the final bullet point needs to be promoted much closer to the top so that it continues the tiered approach to development control priorities and introduces reference to county wildlife sites, as sought by many.

9.14 Map 9.2 was identified as unsatisfactory in various ways, for example in relation to its scale, the content of its key, and the fact that sites with different types and degrees of protection appear to be treated as “equal”. In our view these points are valid. Moreover, the current map does not fulfil any particular function as the LPAs with development control responsibilities in relation to these sites will have far more detailed and reliable sources of information about their nature and boundaries. We therefore recommend its deletion. In its place we recommend inclusion of the Biodiversity Network Map (Fig 6, ENV42) which was drawn to our attention by some participants as providing useful guidance on regional priorities for action in biodiversity matters. Our recommendation **R9.3** includes reference to the map in the policy and it would also be appropriate to expand this in the supporting text.

9.15 We agree with respondents who called for more emphasis on the protection of non-designated sites, and on habitat creation, but do not consider it necessary to refer specifically to wetlands (as sought by RSPB) or other particular types of habitats as the strengthened general policy applies to all.

### **Policy ENV4: Woodlands**

9.16 There is fairly wide support, including from EERA, for basing this policy more closely on a suggestion from the Forestry Commission. We reflect much of the gist of the Commission’s draft in our recommendation **R9.4** but omit some of the repetitive detail. There were a number of other calls for the inclusion of other matters, including targets, but in our view the recommended policy contains all the detail relevant to this topic in a regional spatial strategy.

### **Policy ENV5: the Historic environment**

9.17 English Heritage put forward a suggested revision of the policy, seeking to give it more specific regional focus. This approach was generally supported by EERA and others. We reflect it in our recommendation **R9.5** below, except that we find the final sentence

of the policy suggested by English Heritage more appropriate for inclusion in the supporting text and have not included it beneath.

#### **Policy ENV6: Agriculture, land and soils**

- 9.18 There were relatively few comments on this policy and we are not convinced that it requires change (**R9.6**). Although there was a suggestion that it should be tied more clearly to the content of PPS7 on protection of the best and most versatile agricultural land there is no need for the Plan to repeat this well-known national policy.

#### **Policy ENV7: Air quality**

- 9.19 The terms of this policy generally attract little comment, although some point out that it tends to overlap with the content of other policies. As we see it, paragraphs B21-B24 of PPS12 provide general advice about air quality management to those preparing LDDs and policy ENV7 and its supporting text add nothing of region-specific value to PPS12. Nor do they usefully supplement the content of the other draft Plan policies (as recommended for modification) in so far as these touch on air quality issues. We therefore recommend deletion of policy ENV7 (**R9.7**).

#### **Policy ENV8: Renewable energy and energy efficiency**

- 9.20 We have commented elsewhere on the importance of climate change for the East of England, both because of its vulnerability to the effects of climate change and because of the level of current and future activity in the region whose contribution to climate change causing emissions needs to be minimised. Policy ENV8 and Appendix C to the draft Plan primarily address the latter aspect.
- 9.21 Energy efficiency and renewable energy are two distinct aspects of this, although they may inter-relate, for example where local renewable energy generation forms part of an energy-efficient design approach to development. A number of participants express concern about the relationship between the draft Plan policy ENV8 and the detailed guidance in Appendix C. Much of the latter would appear to be policy guidance which, it is argued, ought to be in the Policy or is of questionable relevance to the draft Plan as it is of a level of detail more appropriate to LDDs or supplementary guidance. We take the view that much of the material in the Appendix, if it is relevant at all, should be in the Policies or supporting text. For example the “Strategic Principles” section 2 sets out the policy basis, while other parts, particularly section 4 on technology-based criteria, include policy guidance for LDDs. As with Policy ENV 8 energy efficiency and renewable energy generation are mixed together in the Appendix.
- 9.22 Starting with renewable energy generation, a central part of the Policy are the regional targets for the percentage of the region’s electricity consumption to be generated from renewable sources set out in draft Plan Table 9.2. These targets of 10% (14% including offshore wind) by 2010 and 17% (44% including offshore wind) by 2020 are generally seen as challenging but achievable. According to the latest statistics (EGY6, East of England Energy Statistics, March 2006) 4.5% is currently being achieved. Several participants suggested that the targets need to be reformulated in terms of Megawatts of installed capacity, rather than as a percentage of electricity consumption, as called for by the guidance in PPS22. The percentages can be converted to equate to 1192 Mw installed capacity at 2010 and 4250 Mw at 2020. Particularly in the case of the target for 2020 further studies are in progress which could lead to more specific and more challenging targets.
- 9.23 We note from the work of Renewables East, reported in documents EERA28 and EGY6, that the targets for Megawatts of installed capacity are made up of different assumptions for different technologies, and that for two of these, landfill gas and



biomass, the targets are already being exceeded. There are historical reasons for this and it may not mean that even higher values would be achieved in future, as for example, biomass may have more of an increasing role for heating and as transport fuel than for electricity generation. The background to these issues shows that targets have to be supported by complex technical analysis, and PPS22 counsels against setting fixed targets for specific technologies. There were suggestions that targets should be set not for electricity generation but for total energy consumption or for carbon emissions from energy use. However desirable this may be as an avenue to explore, forecasting and target setting would also appear fraught with complexity as it brings in issues such as relative markets for gas and electricity and the carbon value of electricity crossing regional boundaries via the National Grid.

- 9.24 The regional targets are based on studies which included county targets, and there was some suggestion that these should be incorporated into the Plan in the light of the guidance in paragraph 5 of PPS22 that targets in RSS may be disaggregated into sub-regional targets “where appropriate”. In the light of the discussion, we conclude that it is not appropriate at this stage to include a county or sub-regional breakdown of the targets in the Plan. This is one of a number of issues which, at the time of the EiP, was to be the subject of further work to be commissioned by EERA. We conclude that the regional percentage targets in Table 8.2 should be retained as policy and also expressed as Megawatts of installed capacity. The supporting text should make it clear that these targets are subject to review and development in the light of further studies. We comment further on these studies below.
- 9.25 The other aspect of provision for renewable energy to be considered is what guidance the Plan should give on locating renewable energy projects. PPS22 says criteria based policies should be set out in RSS where they can be applied across a region or across clearly identified sub-regional areas. Draft Plan Policy ENV8 seeks to encourage various forms of renewable energy development and calls for LDDs to specify locational and other criteria for assessing applications. Section 3 of Appendix C gives further general guidance for LDDs, discussing various locational aspects for energy efficiency and renewables, some of it tending to repeat matters covered in PPS22.
- 9.26 Like others we question the status and value of Appendix C as it stands. Part of the remit for the further work which EERA proposed is to develop suitable locational and other criteria at the regional and/or sub-regional level for incorporation into policy. This will obviously be highly relevant for inclusion in the Plan at the earliest possible stage. Even if the original timetable for the work, to finish by the end of May 2006, proves unrealistic, we consider it likely that results from the work will be available some time before the draft modification stage and certainly before adoption of the final RSS. Nevertheless, we do not consider it appropriate to anticipate what will emerge from the work proposed by suggesting that it should be incorporated directly into the RSS subsequent to the EiP. Obviously extensive co-operation is needed between EERA and the local authorities in the region and with other stakeholders to ensure that any policy content is well supported and soundly based.
- 9.27 We conclude, therefore, that the development of revised and more elaborate targets and regionally or sub-regionally specific locational and other criteria must await a review of the RSS. They may be ready, however, well in advance of the timetable for a full review, and consideration should be given to whether a single issue review would be justified to update the policy framework for renewable energy in line with PPS22. In the meantime we see little point in trying to make up interim criteria or including general commentary in the Plan. We recommend (**R9.8**) that Policy ENV8 is amended in the light of our conclusions and that Appendix C is deleted, but that it is made clear

that a more complete policy framework for renewable energy in the region will be brought forward and included in RSS at the earliest opportunity.

- 9.28 Turning to energy efficiency, views are divided about how far it is appropriate to cover this issue in the Plan. There is wide recognition that reducing energy consumption in buildings as well as more generally is a key national and regional objective for meeting carbon emission targets, and there is support from many local authorities and other participants for what this aspect of Policy ENV8 is trying to do. Development sector participants, however, argued that the issue was a national one that should be pursued through the implementation of new Building Regulations and the Government's proposed Sustainable Buildings Code (HSG 38), and not through unilateral policies in RSS and LDDs. Others argued that while the minimum standards for construction and environmental performance in buildings should be raised they remain just that – minimum standards. The Environment Agency also pointed out that energy efficiency requirements under Building Regulations are widely not complied with and that local authority building control departments require more resources to deal with this. In the case of the Sustainable Buildings Code, the proposed points system could mean that potential energy reduction could be traded off against other aspects of sustainable building.
- 9.29 More energy efficient building is clearly a national rather than a regional concern, and more exacting Building Regulations and the proposed Sustainable Buildings Code are the Government's chosen means for pursuing it. From an East of England perspective, if the region is to make its full contribution to tackling climate change, then the major increase in building which the draft Plan provides for needs to embody the best possible practice in energy saving and reduction of emissions. One suggestion supported by Essex CC and others was to require all development to meet BREEAM or Eco-Homes "excellent" standards, although we believe it may be possible for new standards to go even further. It is not for us to recommend how the regulatory framework and the proposed code should be taken forward, but progress needs to be rapid and far reaching if the region's development in future is to merit being called sustainable. A particularly vital aspect of relying on the regulatory code is that the Local Authority departments charged with building control must be properly equipped with the financial and human resources needed to ensure compliance.
- 9.30 An effective approach through building control and construction standards will avoid the need for local planning authorities to adopt planning policies in their LDDs about energy efficient construction and requiring energy consumption statements, and trying to deal with these matters through planning control, as envisaged by sections a) and b) of Policy ENV8. This would be an additional distraction from the mainstream work of planning departments and although there are some authorities keen to take on this role many others are not equipped or resourced to do so. In our view too much reliance on this route risks duplicating the effort that will be required through building control. Nevertheless, there are important aspects of energy use in development that are beyond the scope of Building Regulations, and that need to be considered in the planning process. This is a matter of ensuring that opportunities to go beyond minimum standards and create more sustainable forms of development are exploited. Opportunities for low carbon developments, local CHP and other "embedded technology" will be particularly important in the major growth locations and major developments in other Key Centres for Development and Change in the Strategy. These need to be approached innovatively through master planning and other positive measures rather than by relying on the lowest common denominator of minimum standards.

- 9.31 We believe it is not helpful for the Plan to try to set detailed requirements for this, or to duplicate or re-invent guidance and good practice that is available elsewhere. Parts b) and c) of Policy ENV8 set a procedural approach and a threshold which introduce inflexibility and another “minimum standard”. PPS22 and its companion guide already provide guidance for LDDs on these matters. What is required is a broad policy perspective which identifies the regionally and sub-regionally specific issues.
- 9.32 Reflecting our conclusions above, we recommend below (**R9.8**) that a revised and more strategic version of points a) to c) of draft Plan Policy ENV8 be included in a separate policy.

### **ENV9: Water supply, management and drainage.**

#### **Water supply**

- 9.33 Water issues are particularly to the fore in the East of England. One of the most commonly-voiced concerns at the EiP was whether or not water supplies in the country’s driest region can support the increased level of development planned in the draft Plan. This concern is reflected in the SA/SEA which highlights pressure on both groundwater and surface water resources, with some areas already experiencing unsustainable abstraction, as a key issue for the region as a whole and particularly in the south and east. Some participants argued that this calls into question the whole strategy of providing for a major increment of growth in the Thames Gateway and LSCP Growth Area. The Environment Agency did not take that view, however, arguing that the proposed level of growth could be catered for provided the right approach was taken to water resource planning.
- 9.34 The EA’s pre-EiP presentation (based on ENV18) advised that a twin-track approach to water-resource planning needs to be adopted in order to avert the arrival of a “water deficit” in some areas within five years. This involves coupling early completion of all currently-planned new resource development with a “step-change” in the level of demand management and water efficiency. Even under that approach the proposed growth of population and housing will return some areas to deficit by the late 2020s without the development of additional new resources, and other pressures such as climate change and environmental needs/statutory requirements could advance that date. According to EA new resource development beyond current plans (such as further inter-catchment transfers, new reservoirs, desalination etc) may be technically feasible but will become increasingly costly and pose additional environmental risks.
- 9.35 Demand management is therefore crucial. The Agency’s key requirement is for water consumption to be reduced by 25% in all new properties. This is said to be an ODPM “expectation”, achievable by existing technology without significant cost. In addition the aim is to achieve an 8% reduction in use through retrofitting in existing properties, although a possible concern here is that EA has applied the whole of the 8% saving “immediately” whereas it estimates that this could take ten years to achieve in full. As far as we can judge from the scenarios modelled in ENV18 (one of which included a 30% addition to the draft Plan housing provision) our recommended increase of just under 7% to the total allocations in draft Policy H1 would not make a critical difference to the water supply situation by 2021 although it would point up the benefits to be gained by seeking increased water efficiency at the earliest possible stage.
- 9.36 Beyond the efficiencies referred to above the EA would look to further reduction in water consumption of up to 30-40% for new properties using technologies such as rainwater re-use and grey-water recycling but considers that these and other methods need further development before widespread implementation can occur. Although the SA/ SEA suggests adopting a “hard target” for water neutrality in new housing, EA

does not consider it feasible to adopt a full water neutrality approach at the present time as delivery would require a step-change in both regulatory and social attitudes, so in the meantime water efficiency has to bridge the gap.

- 9.37 As far as water supply is concerned there is an urgent requirement for progress to be made towards completing the new water resource infrastructure that will be necessary quite early in the plan period. ENV9 needs revision to require the Agency and the water companies to work together with all the other relevant bodies to plan for this, with the supporting text identifying the schemes needing to be submitted to OFWAT in 2007 with a view to implementation in 2010-2015. However, it is also necessary to recognise that the schemes in question still have to be considered through the appropriate statutory processes, including environmental impact assessment. There are, as we understand it, opportunities for gains to the environment and biodiversity as well as adverse impacts. As with road schemes, however, mention of the water infrastructure schemes needed cannot be taken to prejudge or override the assessment of particular proposals. Notwithstanding the statutory “right to connect” (which some, though certainly not all, developers appeared to rely upon somewhat complacently) we consider that local development documents must be sensitive to the need to make the most of areas with spare capacity in the water supply infrastructure and ensure that building rates do not run ahead of the completion of new infrastructure if, in any area, temporary capacity constraints are likely to occur.
- 9.38 With regard to water efficiency, some participants are keen to make the “25%/8%” water efficiency saving objectives into a policy requirement of the Plan, while others advocate immediate or faster transition towards a more fully water-neutral policy position. We agree that the aim of stabilising water consumption should be pursued as fast as possible. However, a number of the region’s water company boundaries cross into London and the South East where issues of growth and water resource pressures are similarly controversial, so it becomes somewhat difficult and artificial to define a specific “East of England” dimension to the water efficiency issue, still less a fully distinctive or effective East of England policy response.
- 9.39 Moreover, in our view the authorities implementing the Plan (mainly the local authorities) do not have the powers to set unilateral requirements about such matters. For example, development control under the Planning Acts has not traditionally been concerned with water supply and consumption issues and (although the concept of “material considerations” is flexible and evolves over time) it is difficult to see how the planning system could be turned into an effective device to impose (and, still less, enforce) water-saving measures without the content of submitted and approved drawings/specifications developing a new dimension of detail, with all the linked issues of staff time, resources and skills. There was considerable reluctance among many participants to accept this position but GO-E confirmed at the EiP (in an exchange about the Sustainable Buildings Code) that it does not see the planning system being used in this way.
- 9.40 It seems to us that the EA’s preferred position on water efficiency can only be secured by formulating a rigorous and co-ordinated regulatory framework at national level which has the ability to deliver what is particularly required in the East of England and the wider south-east. This will have to involve a package of measures such as tightening the requirements of the Building Regulations in relation to water efficiency (although EA feared that the forthcoming review would not set standards demanding enough to combat conditions in the East of England), setting high efficiency standards on the sale and fitment of water-consuming appliances, laying taxing requirements on water companies on matters such as metering and leakage control, and devising other fiscal incentives. Not least of the elements of the package will be a programme for

changing attitudes to water use in the region and making sure people do actually use less water. This will require a campaign for behavioural change on a par with that required to effect a move to more sustainable transport, and to waste minimisation and recycling.

- 9.41 It is clear that the growth proposed in the region can only be sustainable if the water resources issues are properly addressed, and provided the water efficiency gains sought by the EA are achieved. This issue is regionally specific, in that it would not apply in other regions which have abundant water resources, and in our view it needs to be covered as an integral part of the Plan. In our view the strategy would not be sound if it merely omitted to cover the issue because it was for EA and the water industry to deal with under other regulatory regimes than the planning system. This matter needs to be approached with care, however. Making it appear that fulfilment of greater water efficiency is something that can be “required”, “promoted” or “encouraged” through LDDs or SPDs, as the wording of ENV9 tends to suggest, would raise unrealistic and unrealisable expectations and could deflect attention from the need to tackle the matter comprehensively at Central Government level. It also has the potential to lead the Local Planning Authorities in the region into resource-consuming and repetitious efforts to prepare “guidance” and “encourage” outcomes which they do not have the means to enforce, whereas their efforts and limited resources would be more profitably concentrated on addressing other aspects of sustainable development which they are better able to influence directly. (We note that a former DoE publication “Development Plans: a good practice guide” (1992) advised at p87 against policies using “vague phrases such as “...the Council will encourage” and find this still good advice.)
- 9.42 Notwithstanding these limitations on the role of local planning authorities in delivering the necessary water resources strategy, we consider that the final RSS, as a spatial strategy rather than a land use plan, can and should make an important policy commitment on the part of Government. This should show how the development provided for in the Plan will be accompanied by measures to achieve the water resource provision and the efficiency gains required (**R9.9**). We also recommend the inclusion in the Plan of a policy reference to local authorities and other public bodies adopting policies to ensure that buildings which they occupy or own meet high standards of water efficiency. We also support inclusion of a regional water consumption target (such as litres/per head/per day), if this (or another that can be devised) makes it possible regularly and readily to monitor progress towards more efficient water usage.

### **Water treatment**

- 9.43 It became evident during the EiP that the increased annual rates of development proposed in the draft Plan will bring forward the dates by which the capacities of some waste water treatment works will be reached. Thames Water alone identified 10 Sewage Treatment Works (STW) vulnerable to the impacts of the higher growth levels with two having particular difficulties (Rye Meads and Luton). Potential problems at works may be exacerbated in varying degrees by the need to address (a) the technical challenges of treating higher volumes of effluent at the same time as meeting the higher discharge qualities required by the consent procedures under the Water Framework Directive, which may be impossible to meet with current technology, and (b) how to deal with or avoid any potential effects of fluvial flooding resulting from any resulting increases in the quantities of surface water run-off. In the case of Harlow north and North Weald in particular, these problems took on a strategic dimension as one issue (but only one) in considering whether the draft Plan’s proposals would be deliverable.
- 9.44 As in the case of water supply, some developers were rather too content to rely on the “right to connect” without regard to the wider environmental consequences of

inadequate treatment capacity, although others were keen to embrace high or pioneering standards of on-site treatment and grey water recycling. In our view policy ENV9 should point up the need for more certainty of delivery, with these issues being tackled in a timely way by all the relevant partners while also allowing for development to be phased so as not to outrun completion of necessary infrastructure. The necessary detailed studies need to be completed in time for proposals to meet the 2007 submission date for OFWAT's five-year funding cycle. From what we heard the necessary lead-times for the various technical studies and the adoption of local development documents may already make it difficult to achieve timely funding submissions to the regulator, although ODPM accepted during Matter 9A that it may be necessary to "have a dialogue with OFWAT about improving the way in which major water industry schemes are handled". Unless arrangements can be made to overcome any potential bottlenecks/funding delays it remains to be seen whether development in certain areas can be completed to the timescales expected in the RSS.

- 9.45 It is important to recognise that the required studies, although detailed, need to be sub-regional or even regional in scope rather than local. One of the problems has been a tendency for wastewater treatment (like water supply) to be looked at in local terms, with the result that a limited amount of capacity may be "spoken for" several times over in thinking about new development proposals in different locations. As the EA and Thames Water made clear, what is needed are integrated water cycle strategies on a strategic scale. EA's note submitted in response to the discussion in Matter 8H1 (ENV76) suggests a way forward. This is reflected in our recommended changed policy (**R9.9**, new policy ENVxx Integrated Water Cycle Studies).

### Drainage

- 9.46 ENV9 deals with drainage mainly in the context of sustainable drainage solutions. PPS1, at paragraph 22, makes "promotion" of the use of sustainable urban drainage systems in the management of run-off a task for regional planning authorities and local authorities; draft PPS25 (at paragraph F8) repeats this call and provides further advice to LPAs. There is no regionally-specific dimension to interpose between the national advice in PPS1 and draft PPS25 and the more site-specific issues arising in LDDs and development control decisions, so we find this issue worthy of only short mention in ENV9.

### The way ahead

- 9.47 In the light of the discussion, and our consideration of the issues, it is clear that there needs to be closer co-ordination between regional spatial planning and water resource and water cycle strategies. While the EA's Water Resource Strategies for the Anglian and Thames regions, and related documents (STR24, 25, 26, 27) provided some basis for considering supply issues, regional or sub-regional integrated water cycle studies necessary to consider wastewater issues at a strategic level were not available, nor do they even appear to have been thought about, at the time spatial options for development were being assessed. As a result, the EiP was faced with fairly fully developed spatial development proposals, onto which the water supply and treatment issues had to be overlaid, not having previously been assessed in any detail as part of the strategy making process. This reflects an approach which historically has tended to see water issues as "following on" from decisions about development, whereas increasingly there is a need for the two things to be addressed in parallel, and in a more integrated way. In order to address this for the future, we consider the Plan should give more prominence to water issues and map out a process for integrating them more fully into the review of the Plan. To do this we recommend (**R9.9**) replacing draft Plan

policy ENV9 with a set of policies under a separate heading for water resources and wastewater treatment.

## RECOMMENDATIONS:

**R9.1** Change Policy ENV1 as follows:

### **Policy ENV1: Green infrastructure**

Areas and networks of green infrastructure will be identified, protected, created, extended, enhanced, managed and maintained throughout the region to ensure that an improved and healthy environment is available for the benefit of present and future communities. This will be particularly important in those areas identified to accommodate the largest amounts of growth in the region, whether or not officially recognised as such in the Sustainable Communities Plan.

Local development documents will:

- define a multiple hierarchy of green infrastructure, in terms of location, function, size and levels of use, at every spatial scale and across all areas of the region based on analysis of existing natural, historic, cultural and landscape assets, including the identification of new assets required to deliver green infrastructure;
- identify and require the retention and provision of substantial connected networks of green space, in urban, urban fringe and adjacent countryside areas to serve the new communities in the sub-region by 2021; and
- ensure that policies have regard to the economic and social as well as environmental benefits of green infrastructure assets.

Assets of particular regional significance for the retention, provision and enhancement of green infrastructure are:

- The Norfolk and Suffolk Broads, the only area in the region with status equal to a National Park, whose statutory purposes and influence need to be considered well beyond its formal boundaries;
- The North Norfolk Coast AONB;
- The Brecks: a unique area of landscape, ecological and recreational importance with increasing pressures for secure long-term management as a regional park or similar entity;
- Dedham Vale AONB;
- Suffolk Coast and Heaths AONB and associated areas of the Stour Estuary;
- The Great Fen Project;
- Wicken Fen Vision;
- Epping Forest;
- Hatfield Forest;
- Watling Chase Community Forest;
- Thames Chase Community Forest;
- Lee Valley Regional Park;
- The Chilterns AONB;
- Forest of Marston Vale;
- Milton Keynes to Bedford Waterway Park (a project to create a navigable connection between the Grand Union Canal and the River Great Ouse within a linear waterway park).

Urban green infrastructure networks, especially (but not exclusively) at the “Key Centres for Development and Change” and including the “Greening the Gateway” project and the “Green Arc” project around the fringes of Greater London.

**R9.2 Change Policy ENV2 as follows:****Policy ENV2: Landscape conservation**

Planning authorities and other agencies in their plans, policies, programmes and decision-making will, in accordance with statutory requirements, afford the highest status of protection to the East of England's nationally designated landscapes – the Norfolk and Suffolk Broads (having status equal to a National Park) and the Chilterns, Norfolk Coast, Dedham Vale, and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty (AONBs). Within the Broads priority will be given to the statutory purposes of conserving and enhancing the natural beauty, promoting public enjoyment and protecting the interests of navigation. Within the AONBs priority over other considerations will be given to conservation of the natural beauty, wildlife and cultural heritage.

Throughout the East of England planning authorities and other agencies in their plans, policies, programmes and decision-making will aim to recognise, protect and enhance the diversity and local distinctiveness of the countryside character areas indicated on Map 9.1 by:

- developing area-wide strategies, based on landscape character assessments, setting long-term goals for landscape change, targeting planning and land management tools and resources to influence that change, and giving priority to those areas subject to most growth and change;
- developing criteria-based policies, informed by the area-wide strategies and landscape character assessments, to ensure that all development, wherever possible respects and enhances local landscape character; and
- providing/requiring appropriate mitigation measures where avoidance of damage to local landscape character is unavoidable.

**R9.3 Change Policy ENV3 as follows:****Policy ENV3: Biodiversity and earth heritage**

Planning authorities and other agencies in their plans, policies, proposals and decision-making will ensure that the internationally and nationally designated sites in the region are given the strongest level of protection.

Planning authorities and other agencies in their plans, policies, proposals and decision-making will ensure that proper consideration is given to the potential effects of development on the conservation of (a) habitats and species outside designated sites and (b) species protected by law.

Beyond these particular requirements, the region's wider biodiversity, earth heritage and natural resources will be protected and enriched through conservation, restoration and re-establishment of key resources by:

- ensuring that new development minimises damage to biodiversity and the earth heritage resource by (a) avoiding harm to county wildlife sites and (b) wherever possible on all development sites, achieving net environmental gains through enhancement measures and new habitat creation;
- promoting the conservation, enhancement, restoration, re-establishment and good management of habitats and species populations in accordance with the East of England regional biodiversity targets in Appendix B, the targets set out in the UK, England and local biodiversity action plans, and the priorities established in the East of England Regional Biodiversity Network Map (see Map 9.2);



- identifying and safeguarding areas for habitat restoration and re-establishment, in particular for large-scale (greater than 200 ha) habitat restoration for human and wildlife benefit;
- identifying, safeguarding, conserving, and restoring regionally important geological and/or geomorphological sites (RIGS) and promoting their good management;
- ensuring the appropriate management and further expansion of wildlife corridors that are important for the migration and dispersal of wildlife; and
- establishing networks of semi-natural green spaces in built up areas as part of the process of developing more sustainable, safer, secure and attractive urban and built forms.

The East of England Regional Assembly will establish effective co-operation with authorities from neighbouring regions on cross-border issues which require inter-regional co-ordination, specifically with regard to the Wash and the Thames Estuary together with important landscape and biodiversity initiatives such as the Chilterns Management Strategy, and more widely in relation to the potential impacts of climate change, water transfer and waste management.

**R9.4** Change Policy ENV4 as follows:

**Policy ENV4: Woodlands**

Planning authorities and other agencies in their plans, policies, proposals and decision-making will seek to achieve an increase in woodland cover in the region both by protecting and achieving better management of existing woodland and by promoting new planting where it would be consistent with landscape character.

Protection of existing woodlands: all ancient semi-natural woodland and other woodlands of acknowledged national or regional importance will be identified in Local Development Documents with a strong presumption against development that would result in their loss or deterioration; aged or veteran trees will also be conserved. The nature conservation value of all woodlands is recognised and conversion of any woodland to other land uses will be resisted unless there are overriding public and ecological benefits. Woodland unavoidably lost to development should be replaced with new woodland of at least equivalent area and composition, preferably in the same landscape unit.

New woodland creation should be targeted specifically at:

- schemes for the restoration of derelict or contaminated land and sites formerly used for mineral-extraction or industry;
- green infrastructure projects at towns planned for significant growth (eg through the Sustainable Communities Plan);
- the Thames Chase, Watling Chase and Forest of Marston Vale Community Forests, with the aim of increasing their woodland cover to 30% by 2030;
- planting schemes along transport corridors; and
- schemes to expand and link areas of native woodland and create new wet woodland (which is a priority in this region).

**R9.5** Change Policy ENV5 as follows:

**Policy ENV5: The historic environment**

Planning authorities and other agencies in their plans, policies, proposals and decision-making will identify, protect, conserve and, where appropriate, enhance the historic environment of

the region, its archaeology, historic buildings and places and historic landscapes, including those features and sites (and their settings) especially significant in the East of England:

- the internationally renowned historic cities of Cambridge and Norwich;
- an exceptional network of historic market towns;
- a cohesive hierarchy of smaller settlements ranging from nucleated villages, often marked by architecturally significant medieval parish churches, through to a pattern of dispersed hamlets and isolated farms;
- the highly distinctive historic environment of the coastal zone including extensive submerged prehistoric landscapes, ancient salt manufacturing and fishing facilities, the relict sea walls of grazing marshes, coastal fortifications, ancient ports and traditional seaside resorts;
- formal planned settlements of the early twentieth century, including the early garden cities, and factory villages;
- conservation areas and listed buildings, including domestic, industrial and religious buildings, and their settings, and significant designed landscapes;
- the rural landscapes of the region, which are highly distinctive and of ancient origin; and
- the wide variety of archaeological monuments, sites and buried deposits which include many scheduled ancient monuments and other nationally important archaeological assets.

**R9.6** No change to Policy ENV6: Agriculture, land and soils

**R9.7** Delete Policy ENV7

**R9.8** Revise Policy ENV8 to the form of two separate policies for renewable energy and energy efficiency, changed as below. Appendix C should be deleted and the supporting text to the policies below should set out the proposed timetable for putting in place fuller regional guidance for renewable energy.

**Policy ENV8: Renewable energy**

The development of new facilities for renewable power generation will be supported, with the aim of meeting the following regional targets:

By 2010

At least 1192 Megawatts of installed capacity for renewable energy

By 2020

At least 4250 Megawatts of installed capacity.

These targets are equivalent to 14% of total electricity consumption in the East of England (or 10% excluding offshore wind) by 2010, and 44% (17% excluding offshore wind) by 2020.

The above targets are subject to revision and development in an early review of this RSS.

LDDs should support renewable energy development by including appropriate policies following the general approach set out in PPS22, pending the provision of more specific regional guidance on location or technology specific criteria through the review of this RSS.

**New Policy (ENV9): Energy efficiency**

In order to meet regional and national targets for reducing climate change emissions, high standards of energy efficiency will be sought in all development. Local authorities in the region should:

- maximise opportunities, particularly in major growth locations and in Key Centres for Development and Change, for developments which set new standards in energy efficiency, reducing emissions and the on-site use of renewable energy technology;
- promote innovation through masterplanning exercises and development briefs; and
- promote greater energy efficiency in development throughout their area by including appropriate policies within Local Development Documents in line with the guidance in PPS22 and its companion guide.

**R9.9** Replace Policy ENV9 with a set of Policies relating to water issues as follows:

**Policy ENVxx: Water efficiency**

The Government will work with the Environment Agency, water companies and regional stakeholders to ensure that the development provided for in the Spatial Strategy is matched with improvements in water efficiency so as to effect savings of at least 25% compared with 2006 levels of water use in all new development, and savings of at least 8% in existing development. This will be pursued through a co-ordinated programme of measures including changes to Building Regulations and other appropriate regulatory regimes, fiscal measures, incentive schemes and other measures to reduce water consumption and wastage.

**Policy ENVxx: Water resource development**

The Environment Agency and the water companies will work together with OFWAT, EERA and the neighbouring regional assemblies, the local authorities, the delivery agencies and others to ensure timely provision of sufficient enhanced infrastructure capacity for both water supply and waste water treatment to cater for the increased levels of development provided through this plan.

**Policy ENVxx: Integrated water cycle studies**

The Environment Agency will co-ordinate a programme of Strategic Integrated Water Cycle Studies to address the water and wastewater treatment issues relating to growth proposed in this RSS and to the options for additional development locations. Such studies will involve the water industry and other regional stakeholders and should be completed in time for the findings to be taken into account in the next RSS review.

**Policy ENVxx: Planning for water resources and waste water**

Complementing the approach of Policies ENVxx to ENVxx, local development documents will plan to site new development so as to maximise the potential of the existing water/waste water treatment infrastructure and minimise the need for new/improved infrastructure. New development may need to be phased to ensure that it does not exceed the capacity/environmental limits of the infrastructure or proceed ahead of assured completion of planned improvements.

The Environment Agency will work with other relevant partners in the region to ensure that their plans and decision-making take account of the environmental consequences of river basin management plans, catchment abstraction management strategies, groundwater vulnerability maps, groundwater source protection zone maps, proposals for water abstraction, and proposals for provision of on-farm water storage facilities.

The East of England Regional Assembly will work with other public bodies in the region to devise a code for the adoption of high standards of water efficiency in new buildings which are publicly owned or funded (or occupied by public bodies) and in appropriate works of repair/refurbishment to such buildings.



## CHAPTER 10 - WASTE

- 10.1 The waste management issues discussed are summarised in the Panel Note for Matter 6. As noted there, the main issues revolve around the fact that the draft Plan has been overtaken by the new approach of PPS10, published in July 2005, which in effect expects RSS to contain the Regional Waste Management Strategy (RWMS) in much the same way as it contains the RTS. The key question was how far the draft Plan could now be updated through the EiP and subsequent stages, to bring it into line with PPS10. In most general respects the draft Policies remain consistent with national policy, although some of the language and presentation – for example reference to Best Practical Environmental Option (BPEO) - need to be updated. More specifically, however, the new approach would mean including the apportionment of tonnages of waste to be managed for each Waste Planning Authority area (WPA) or virtual county within the region. A key input into that would be the work done, since publication of the draft Plan by consultants ERM for EERA on waste arisings and for GO-E on apportionment. These exercises were presented at the EiP seminar session on Waste (MNW5, 5A/B/C, MNW 6A, 6B, 6C).
- 10.2 The inter-regional position, and particularly the future role of the East of England in dealing with waste from London, is a major part of the background to this and is a pan-regional issue involving London, the South East and East of England, and to a lesser degree the East Midlands. The EiP seminar session discussed a presentation from the GLA on The Mayor of London's approach to London's waste planning, including the waste apportionment for London Boroughs and the implications for the East of England. Work going on in the South East region on a methodology for apportioning London waste, although not presented at the seminar session, was also brought to our attention (MNW8).
- 10.3 The three regions have taken somewhat different approaches, and are at different stages in updating their strategies. Although they include each other in consultation, there were calls for a pan-regional forum on waste to be set up so that these inter-regional technical issues can be addressed. We find it extraordinary that no such forum was maintained following the abolition of SERPLAN, and feel sure that such a retrograde step cannot have been intended when regional planning arrangements were reorganised. We conclude that such a forum should be established for the future to enable technical aspects of waste planning for the wider south east to be co-ordinated and for policy aspects to be properly debated between regions. Our recommendation **R10.10** covers this.
- 10.4 Meanwhile the question remains about how to tackle apportionment in the context of the current Plan. We recognise the position of EERA and the WPAs within the region that the apportionment raises serious issues that need to be subject to consultation, debate and environmental appraisal. In particular, it needs to be recognised that historic patterns of waste movement will not necessarily be able to continue (see the discussion of Marston Vale at paragraphs 10.12-10.15 below). Nevertheless there is clearly an urgency about putting more specific regional and sub-regional guidance in place. Although we heard of various examples where progress is being made in developing waste management facilities, a continued lack of quantified sub-regional guidance will inevitably mean delay in taking forward the planning of further facilities, especially given the controversy often surrounding such proposals. Yet delay is likely to inhibit progress in meeting targets for recycling and more sustainable waste management, and could compromise the UK's ability to meet the requirements of the Landfill Directive.

- 10.5 The ERM work on apportionment of Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C&I) in the East of England (MNW5B) presents a worthwhile starting point based on the best available evidence at the time. The current position on tonnages of MSW and C&I waste to be imported from London is helpfully summarised in the Explanatory Note submitted by GO-E (MNW8A). EERA had put forward a proposal for a rapid review of the Plan waste management policies, to commence as soon as our report is received. There were suggestions, however, that on the basis of work already done, it would be possible for apportionment to “catch up” with this round of the RSS. We were provided with a note from the Regional Waste Technical Advisory Body (RTAB) suggesting a programme for arriving at an agreed apportionment by August 2006 (EERA31). This involves reviewing not only the ERM work but also the approach taken by Jacobs Babbie for SEERA. While not anticipating our recommendations, we gave encouragement at the EiP for this approach to be pursued, and we hope that rapid progress towards it is being achieved.
- 10.6 We conclude that it should be practicable for the programme of work proposed by the RTAB to be integrated into the process leading to the changes stage of the Plan, enabling the apportionment of MSW and C&I waste to be included. The decision on that apportionment will also need to take account of the limitations on the future strategic potential for landfill in the Marston Vale area. The region’s WPAs will have had an opportunity to contribute to the apportionment exercise through EERA, and consultation is built into the programme proposed in document EERA31. However, full consultation at the RSS changes stage, as well as Sustainability Appraisal/SEA of the proposed apportionment and the Policy containing it, will be particularly important as the proposals will obviously not have been published with the draft Plan or discussed in terms of the specific numbers in the EiP. Our recommendation **R10.5** proposes this way forward.
- 10.7 In many other respects the amendments necessary for the draft Plan policies to reflect the new approach of PPS10 can be made by simple updating and by bringing forward policies and other material from the Regional Waste Management Strategy of 2003 (MNW2), with suitable amendment. The RWMS itself was in need of updating and the EiP raised the question of its role in future if its policy content were to be subsumed in the RSS. In some cases the policies of the draft Plan and the RWMS repeat each other, while in others the RWMS contains policy material that ought to be in the Plan. We favour the suggestion by Herts CC that in future the RWMS could serve to provide more detailed technical advice. Such advice, together with the detailed statistical material in the RWMS that would not be appropriate for inclusion in the RSS, could form a free standing technical supplement to the RWMS that would be embodied in the final RSS if our recommendations below are followed.
- 10.8 One of the comments made about the draft Plan’s waste policies is that the objectives should be more closely tied in to the rest of the spatial strategy. We agree with this and have sought to strengthen the objectives in Box 9.1 accordingly, and also recommend at **R10.1** that they be set out as an over-arching RWMS policy, on the same lines as Policy T1, the RTS Objectives.
- 10.9 A key challenge to the planning system from national and regional waste strategy objectives is to deliver the facilities that will be required for the management of waste, in particular the capacity needed higher up the waste hierarchy in order to meet targets for recycling and recovery, as well as a succession of landfill capacity for future disposal of residual waste and post-recovery residues. As well as incorporating this into the revised objectives in our proposed Policy WM1, we conclude that this aspect of draft Plan Policy ENV10 should be strengthened. Elements of what is required are already contained in the RWMS 2003, for example in policies 2, 11, 12, 14, 18 and 19.

The policy should also be targeted clearly on the additional development that will be needed to cater for the tonnages of waste in the sub-regional apportionment. Despite the need for a strong policy on this matter, it is also important that RSS does not try to be too precise or prescriptive about the type and size of facilities required. These matters need to be determined in the light of more detailed information and local considerations. Our recommendation **R10.2** reflects these conclusions.

- 10.10 New development will have a key role to play in delivering more sustainable waste management. As well as seeking to minimise waste production, it may provide particular opportunities for innovations including local waste recycling, composting and energy recovery. Obviously the opportunities, and the need for more sustainable waste practices, will be greatest where the scale of new growth is greatest. The last part of draft Plan Policy ENV10 and RWMS (2003) policy 9 provide the starting point for our recommendation **R10.3**.
- 10.11 Turning to waste management targets, the percentage targets set out in draft Plan Policy ENV11 would have more meaning in planning terms if translated into tonnages of waste needing to be recovered. This would bring them more into accord with the approach expected by PPS10. The RWMS (2003) provides a basis for attaching tonnages to these targets (MNW2, paragraph A1.22), but this may need to be re-examined in the light of work that has been done since the draft Plan was submitted, in particular the ERM Study for EERA of existing waste facility capacity and future needs (MNW5). We recommend at **R10.4** that this is done. We have not specified the tonnages, as these could be subject to further change in the light of the additional work on regional and sub-regional apportionment discussed in paragraphs 10.3 and 10.4 above, and reflected in our recommendation **R10.5**. It is obviously important that the tonnages attached to the targets be based on the most up-to-date figures available at the time the Secretary of State's Changes are published.
- 10.12 Draft Plan Policy ENV12 on regional self-sufficiency, and RWMS (2003) policies 2 and 3 which deal with regional and county self-sufficiency, will to some extent be eclipsed by the regional and sub-regional apportionment when it is agreed, and assuming it includes the apportionment of wastes imported from London. Nevertheless, a policy which retains the principles of these policies, updated as necessary, will be an important adjunct to the apportionment, and would reflect the key planning objective of providing a framework in which communities take more responsibility for their own waste (PPS10 paragraph 3). This is reflected in recommendation **R10.6**.
- 10.13 Hazardous wastes and Construction and Demolition (C&D) wastes are not covered specifically by the apportionment exercise discussed above. We understand, however, that some C&D waste is likely to form a component of the waste that will continue to need to be exported from greater London. For hazardous waste, we note from draft Plan paragraph 9.64 that the region currently has no authorised landfill sites and very limited treatment facilities. Clearly, as the draft Plan recognises, adequate provision will need to be made for dealing with hazardous waste if the aim for regional self-sufficiency is to be achieved. We understand that studies are continuing, and from the material before us it would appear unlikely that more specific provision can be made than Policy ENV13 at this stage. Our recommendation **R10.7** therefore retains this policy, which will need to be revisited in the first review of the RSS.
- 10.14 The environmental impact of waste management operations is obviously one of the key planning considerations for waste planning. Most of the issues need to be considered in detail and at a local level, and are subject to guidance in PPS10 and elsewhere which does not need to be explored in depth here. There is, however, a strategic dimension, particularly in Marston Vale, where a conflict has been identified between on the one

hand regional priorities for environmental regeneration and the area's role in the MKSM Growth Area, and on the other its historic role in providing a strategic landfill resource. This was discussed in Matter 6, following an initial discussion at the MKSM Sub-Regional Strategy EiP.

- 10.15 We recognise the concerns of the local authorities and the developer about the negative effects of continuing landfill operations on development, although we note that a key concern appears to relate mainly to specific development proposals in the northern Marston Vale, whereas the Vale as a whole includes a much broader area. More broadly the concern appears to be as much with the image and marketability of the area as with direct environmental impacts. The latter ought in any event to be contained within acceptable limits by good planning and the operation of other controls at the local level, and this should be a priority in local and waste development documents, and in Master Plans as referred to in draft Policy BL2. Appropriate separation between locations for waste management and sensitive development such as housing will obviously be important for as long as landfill continues in the Vale.
- 10.16 The draft Plan seeks to address this issue in Policy BL2, which allows for continuing landfill but with new landfill only permitted for residues following recycling and other treatment. It is generally recognised, even by Beds CC, that there will be a need for some landfill operations to continue in the Vale, but BCC considers this should be limited to meeting local needs in future. Thus BCC looks for an end to the disposal of imported waste in the Vale, particularly if the area is now expected to contribute to strategic housing growth. We take the view that the issue is one of scale, not the source of waste (although we note that some 75% of the waste deposited in the Vale is said to be imported), and that the important thing is to ensure that the location, scale and nature of future waste management operations in the Vale are kept within limits that ensure they do not conflict with objectives for growth and regeneration. It is clear that this means a reducing role for landfill in the Vale, but it is not clear to us, from the evidence provided, that this can take the form of an immediate end to provision for further imports, or when such a position could be reached.
- 10.17 Although the Marston Vale is the only location in the region where the issue has assumed these proportions, it needs to be borne in mind that if the potential capacity of the Vale were ruled out for managing any further imported waste, alternative capacity would need to be found. The options within the region are limited, and may raise similar issues of conflict between waste disposal and objectives for growth and regeneration, particularly in South Essex. We conclude that, whilst it is desirable to reduce as far as possible the strategic landfill role of Marston Vale, the degree and timescale to which this is achieved cannot be divorced from the need to quantify the provision required regionally and inter-regionally. Thus we consider that draft Plan Policy BL2 takes broadly the right approach but needs to be linked to the regional and sub-regional apportionment. As drafted the wording of the Policy is in some ways more appropriate to a LDD and needs to take a more strategic approach. Our recommendation **R10.5** deals with the apportionment of both the East of England and imported waste through work already undertaken or in hand. In determining that apportionment, one criterion should be the desirability of reducing as far and as rapidly as possible the demand for strategic landfill capacity in the Marston Vale. Our recommendation **R10.8** covers this.
- 10.18 Along with the physical planning policies, achieving the objectives of the Regional Waste Management Strategy is dependent on other, non-land use actions. These actions include the measures needed to help reduce waste creation both by individuals and corporate activities, to improve the viability of recycling by developing markets and through other forms of influence, to change attitudes towards waste and to facilitate



sustainable waste management practice by waste disposal and collection authorities. (They are also closely tied in with matters that need to be approached at a national level such as awareness raising, and regulation of packaging and other waste intensive sectors). These issues are not currently covered by the waste policies of the draft Plan, but appear well addressed in the RWMS (2003), particularly by policies 5, 6, 7, 8, 10, 13, 15 and 16. These matters were not discussed at the EiP and fall outside what is traditionally regarded as the scope of planning. Nevertheless, they bear on the land use related policies of the RWMS in much the same way as policies for demand management, modal shift and influencing travel behaviour bear on the infrastructure related parts of the RTS.

- 10.19 If, as we recommend, the RWMS is made part of the RSS, this will help to give it a higher profile alongside housing, environmental and transport strategies for the region. It is for consideration how much of the non-land use content of the RWMS should be transferred to the RSS, but given the wider-than-land use scope of spatial strategies, we consider that these issues have a place in the Plan, provided it is made clear that the route to implementation is through means other than the Town and Country Planning system. This will serve to highlight the importance of the relationship between the operations of waste collection and disposal and planning authorities, and maintain the visibility of the non-land use policies if the remainder of the RWMS is relegated to the role of supporting technical advice. As these policies were not debated at the EiP, we do not draw conclusions about them in detail. However we recommend (**R10.9**) that the RSS should include policy drawn from the non-land use content of the RWMS (2003) subject to any necessary updating and revisions that may be needed to reflect the current policy context. That context may include matters arising from the DEFRA Review of Waste Strategy (MNW13) which came out after the EiP discussion.
- 10.20 Our conclusions and recommendations in this section have sought to address a need to upgrade and update the content of the draft Plan as it relates to waste. Inevitably this can only be done properly by taking on board the latest statistical information and the input of the responsible organisations within the region in a constantly changing situation. For this reason in places we have put our recommendations in general terms rather than specifying precise wording and figures as we have sought to do elsewhere. We believe, however, that the intention will be clear and that the information required to complete the proposed policies can be readily brought together. The Government Office will need to consult EERA, WPAs and certain other stakeholders before draft changes are issued, on the regional/sub-regional apportionment following recommendation **R10.5**. This should provide an opportunity for them also to make an input into other aspects, particularly translating the RWMS (2003) policies into up to date policies for inclusion in the RSS. Obviously time will be limited, and it would be helpful for the necessary consultations between GO-E, EERA and others to begin as soon as practicable after delivery of our report rather than wait for the draft changes to be drawn up.
- 10.21 There are limits, however, to how far the RSS waste management content can be brought up to the ideal PPS10-compliant standard this time round. Inevitably further refinement will be needed of various policies, including the regional apportionment and facilities for hazardous waste. Thus there will remain an important task for the review of RSS, which will also be able to take account of what emerges from the inter-regional waste forum which we consider needs to be set up. Therefore, although we consider that it is essential for this Plan to deal as fully as possible with the quantified aspects of waste planning in the region now, we consider it should also flag up the need for the waste strategy to be revisited in the first review of the RSS. This is covered by our recommendation **R10.10**.

**RECOMMENDATIONS:**

**R10.1** Revise Box 9.1 to form a new Policy WM1 setting out objectives for waste management in the region, as follows:

**Policy WM1: Objectives for waste management**

In implementing the overall vision and objectives of the Regional Spatial Strategy, waste management policies will seek to meet the following regional objectives:

- to move the management of waste up the waste hierarchy of reduction, re-use, recycling, composting and energy recovery, with disposal as a last resort;
- to ensure timely and adequate provision of the facilities required for management, recycling, processing and disposal of the region's waste in all waste streams, and including wastes imported into the region for the time being;
- to minimise the impact of new development, particularly the concentrations of growth in the Key Centres of Development and Change, on regional waste management requirements;
- to reduce the environmental impact of waste management; and
- to enlist and encourage community support and participation in promoting responsible waste behaviour, viewing waste as a resource and maximising re-use, recycling and composting of waste, while responding positively to the need to manage the remainder.

**R 10.2** Replace policy ENV10 with a new Policy **WM2: Planning for waste management**, incorporating changes to reflect the new approach of PPS10 and incorporating relevant policy guidance from the existing RWMS. The policy should include the following changes:

- replacing the references to BPEO and the proximity principle with appropriate new wording;
- including bullet points requiring waste development documents to ensure provision for sites of sufficient number and capacity to manage the tonnages of wastes for each WPA identified in the regional waste apportionment policy; and
- identifying, on the basis of the apportionment policy, and the targets for waste management, the additional capacity likely to be required in each WPA/virtual county for recovery, recycling, treatment and disposal of wastes. This should specify the general type of facility and its locational requirements, while leaving flexibility for innovation and local determination of the precise type and size of facilities.

Omitting the final paragraph (see Policy WM3 below)

**R10.3** Add a new Policy **WM3: Waste management in development**, based on the final paragraph of Policy ENV10, but emphasising the role of strategically significant development in the Key Centres for Development and Change in achieving progress towards sustainable management of waste through innovative approaches to local waste reduction, recycling and management.

**R10.4** Change Policy ENV11 to become, **Policy WM4: Waste management targets**, the targets for Municipal solid waste and commercial and industrial waste should be extended to provide targets for achievement by 2021. Either within the policy or in the supporting text, the implications of these targets should be expressed as tonnages needing to be recycled annually for each of the waste streams, based on the latest available figures.

**R10.5** Include a new Policy **WM5: Regional waste apportionment**, this should set out the tonnages of waste to be managed in each WPA/virtual county area by 5 year intervals

up to 2021. It should be based on the output of the apportionment exercise (document MNW5B), or on such alternative or modified version as may be agreed after work by EERA and the RTAB before publication of the changes to the draft Plan. The apportionment should identify separately the tonnages of waste expected to be imported from London either as residues for disposal or untreated waste for processing and disposal.

**R10.6** Change Policy ENV12 to form a new Policy **WM6: Regional and sub-regional self-sufficiency**, this should maintain the general principle of ensuring that the region deals with its own waste management needs and progressively reducing the import of wastes for treatment from outside the region. The specific targets proposed in the policy may need to be reassessed in the light of the apportionment exercise.

**R10.7** Retain Policy ENV13 as **Policy WM7: Hazardous waste**, changed if appropriate by expanding it to include reference to construction and demolition waste and to reflect any more specific information arising from current further studies before the publication of draft Plan changes.

**R10.8** Include a new Policy **WM8: Waste management in the Marston Vale**, based on draft Plan Policy BL2, but making the point that the use of potential landfill capacity in the Marston Vale should provide for a reducing annual tonnage over time, and should be limited so as not to compromise objectives for environmental regeneration and housing provision in the Vale in connection with its role in the MKSM Growth Area. The Policy should also cross refer to the Bedfordshire allocation in the regional apportionment policy WM5 above, and indicate that any future review of the apportionment should take account of the need to avoid conflict between waste management and other objectives within the Vale.

**R10.9** Include policy, drawn from the non-land use policies of the RWMS (2003), to provide a framework for the non-planning actions required to complement Policies WM2 to WM8 in order to achieve the objectives of the RWMS as part of the Regional Spatial Strategy.

**R10.10** Delete Policy ENV14, but replace it with a reference in supporting text to the future role of the RWMS once it has been reviewed, in providing more detailed technical advice for implementation of the RSS waste policies. The supporting text should also refer to the programme for further developing the RWMS policies within the RSS through the first review. It should refer in particular to the establishment of an inter-regional technical forum on waste with the relevant authorities in the South East of England and Greater London, and to the participation of the East of England in such a forum with a view to ensuring a harmonised approach across the three regions towards future rounds of strategic planning for waste management.



## CHAPTER 11 - IMPLEMENTATION & DELIVERY, MONITORING AND REVIEW

### Fitness for purpose of the RSS

- 11.1 Before discussing the detail of the Implementation policies, we consider the fitness for purpose of the draft Plan document itself in conveying the Policies of the RSS. Apart from commenting on the soundness of the Plan (see paragraph 3.13) we have already given our views on the improvements that need to be made to the content and order of the document in earlier chapters. One of our general conclusions, supported by the views of many who commented, is that the draft Plan is far too long. This stems in part from the fact that, as a consultation draft, it sought to set out the reasoning and justification and a good deal of the background to the Policies, as well as the content itself. The final RSS can, we suggest, be a much more streamlined document, with the supporting text confined to such explanation and elaboration as is essential to ensure that the policies are correctly interpreted and applied. We have not attempted to draft that material in full, but where particular items that need to be covered (and which may not already be covered in the draft Plan) arise from our conclusions, we have mentioned them. Elsewhere the text of the draft Plan often provides what is required, subject to updating and extensive pruning. Generally we consider that if our recommendations for revising the content of the draft Plan are followed it will make it a much more usable document.
- 11.2 The remaining specific “form and content” issue is the key diagram. This was the subject of many comments as to its adequacy, and various improvements were suggested by participants. We will not rehearse all the suggestions made but draw out some of the key ways in which we recommend (**R11.1**) the diagram needs to be improved. The first improvement would be to enlarge the diagram itself to at least A4 size (or even fold-out A3), putting the key on the facing page instead of the contextual map showing a large part of the European mainland, which appears to serve no particular purpose in relation to the content of the RSS. (It would possibly be more useful to replace the European map with a separate map of the East of England with the Local Authority and perhaps other key administrative boundaries shown). Those sub-regions which will be retained in the final RSS should be shown diagrammatically with less seemingly geographically accurate boundaries, perhaps using a single form of simple shading rather than the strong colours used in the draft Plan diagram. The pale green shade covering the rest of the region or the “generic policy areas” should be dropped as it has proved positively misleading, having led people (a) to believe it was a sort of relict “rural sub-area” and (b) to misunderstand the region-wide underlying nature of the generic policies.
- 11.3 Although there were calls for indicating the LSCP Growth Area more clearly, we do not favour this as we do not see it as a cohesive planning entity. It will be clearer and more satisfactory for the diagram to focus on the regional Key Centres for Development and Change in our recommended Policy SS3. If possible, it would be helpful to indicate by a simple notation the different scales of growth at the key regional centres.
- 11.4 Other basic provisions in the RSS which should be represented by appropriate symbols are:
- retail status (E9);
  - regional transport nodes (T5);

- regional strategic employment location (E4); and
  - priority areas for regeneration
- 11.5 The extent of the Green Belts should be shown diagrammatically and with the locations for Green Belt reviews revised in accordance with our recommendations for Policy SS7. Either on the key diagram, or possibly on a separate Map illustrating our recommended Policy ENV1, it would be helpful to give a general indication of the Broads & the AONBs and other strategic items of green infrastructure. The main river catchments should possibly also be illustrated, although this too may need to be on a separate diagrammatic map.
- 11.6 The above represents a considerable amount of information to illustrate on one regional diagram and we have indicated some cases where recourse may need to be had to separate ones. We would agree with GO-E that inset maps to show greater detail may be unhelpful as they can create differences from the “master” diagram. To avoid this, if separate illustrations are used they should show separate information that is not also on the key diagram. In general the various supplementary maps and diagrams included in the draft Plan are helpful, and we have suggested the inclusion of the regional Biodiversity Network Map in place of the present Map 9.2 (see paragraph 9.14, **R9.3**).
- 11.7 Finally, the Regional Transport Strategy needs to be adequately illustrated, which may also require one or more separate diagrams. In this context we find the separate Maps 8.1 and 8.2 showing “regional” and “strategic” networks particularly unhelpful, as one has to flip between the two to gain an idea of the relationship between the two levels. This may be a result of limitations in the particular computer mapping method used. We conclude that again a larger diagram is needed with sufficient different notations to enable the whole network to be shown. The Key Centres, as well as regional transport nodes need to be illustrated. If sufficiently firm and durable information is available it would also be helpful to illustrate graphically the priorities for investment on the strategic rail and highway networks.

**Policies IMP1: Conditions for success**

**IMP2: Development contributions**

**IMP3: Establishment of Local Delivery Vehicles**

- 11.8 We now deal with policies IMP1-3, encompassing the necessary resources and organisational arrangements to implement the draft plan. IMP1 and IMP2 address the need to secure funding for the physical and social infrastructure essential to support truly “sustainable” development but it was EERA’s own view that these policies would not be effective (because Government has not made a sufficiently clear commitment to its own major role in providing that funding) that led to the Assembly’s decision to suspend endorsement of the draft Plan.
- 11.9 In reaching that view EERA reflected a deep and widespread lack of confidence among many of those responding to the draft plan, stemming from the perceived experience of local authorities and service providers of past under-funding of capital and revenue investment in infrastructure across a wide range of needs. In the light of that experience the concerns are that the proposed levels of growth will strongly exacerbate the existing accumulated “infrastructure deficits”. Areas of funding about which fears were evident included all areas of transport (rail, road, buses, freight and walking & cycling), affordable housing, water supply, sewage treatment, health, social services, education and skills, policing, resources for the voluntary sector, provision of green infrastructure in its widest sense, regeneration of the urban environment, biodiversity and heritage, recreation and leisure, and others. These areas encompass most of the components of sustainable communities identified in “Homes for All”. Various studies were referred

to in support of the argument that there is a sizeable funding gap between the estimate total infrastructure costs and identifiable sources of funding (e.g. ECN32, ECN33).

- 11.10 Local authorities and service providers also have widespread concerns that infrastructure costs have not been adequately assessed, especially in fields other than transport, while Essex and Herts CCs considered the plan non-compliant with S5(3) of the PCP Act because of its inadequate assessment of resources.
- 11.11 As a result of their concerns about funding EERA brought forward (in matter 2C) a suggested new policy IMP2 (with existing policies IMP2-IMP4 being renumbered). This aimed to make development dependent on the achievement of key milestones in the delivery of essential infrastructure and a satisfactory relationship between housing and employment growth. Many local authorities supported this more contingent approach, allowing growth commitments to be frozen or cancelled if the necessary “linked infrastructure” failed to be completed. Despite the superficial attractions of this many other participants saw the terms of the policy as impractical if they are intended to apply for development control purposes and in the context of the tests in Circular 05/2005. Not only would it be impossible to define a “satisfactory” housing/employment relationship in a precise way at any one point in time, it would also be hard to measure and monitor in a sufficiently reliable way. Some service providers argued that the assumed development/infrastructure links and dependencies could only rarely be defined and justified with enough clarity or precision, especially in the context of an RSS, although there may be cases where more local infrastructure thresholds can be identified at LDD or master plan level.
- 11.12 Responding to criticisms of the perceived negativity of the first version of new IMP2, EERA put forward a later revision intended to take a more positive and enabling approach, which was discussed during matter 9A. They also commissioned work from consultants seeking to identify dependencies between transport and development proposals, and the first results of this work, in relation to the Thames Gateway Sub-region, were submitted at an advanced stage of the EiP (document EERA34). In our view this document served to illustrate some of the difficulties with the approach EERA was seeking to pursue. At a general level it is very difficult to identify dependencies other than in broad and uncertain or partial terms. At the level of an individual site specific proposal it is possible to identify essential infrastructure eg for access, and to introduce phasing or conditionality if necessary. At a strategic regional or sub-regional level the relationships are much more diffuse than this and it would not appear possible to use them as a mechanism for controlling development. Although the second version of EERA’s proposed policy was an improvement on the first we conclude that it is still too long, complex, and impractical to operate, and we do not recommend its inclusion in the RSS, apart from the elements subsumed in our recommended policies IMP1 and IMP2 (**R11.2**).
- 11.13 This still leaves the fundamental issue of how to ensure that the principles of sustainable communities, as defined by Government and embraced by the RSS, are truly enacted when development is delivered. This means ensuring that housing does not come in isolation but is matched appropriately with all the attendant infrastructure. Funding through development itself may be part of the answer but local authorities and developers alike were nervous about expecting too much from development contributions. For strategic infrastructure, especially to support major increments of growth, it is clear that mainstream public expenditure must remain a major factor, alongside private investment and any additional growth funding programmes. It is understandable that Government finds it difficult to make binding commitments over the whole period to 2021, a period which could include up to seven spending reviews, but nonetheless stresses the need for an effective spatial planning framework to meet

future development needs. As emphasised by representatives of the development and business sectors and the service providers, a firm planning framework is needed to provide the certainty necessary for long-term financial planning and investment in more sustainable strategies. This applies with particular force to the larger-scale projects that can potentially offer the greatest contributions to new or improved infrastructure. Short-term caps and stop-start development policies are inimical to sustainable development.

- 11.14 Recognising this issue, EERA expressed the wish to work with Government to map out the longer term funding requirements in full, with well defined responsibilities for central, regional and local government and for the private sector. Other participants across the whole range of interest groups considered the plan unsound in the absence of an adequate implementation plan and sought the establishment of some form of implementation process or plan capable of offering more confidence in its effectiveness than Appendix F (the implementation schedule).
- 11.15 In our view some participants looked for too much inappropriate detail in the form of an operational implementation plan. The RSS needs to be a high level regional statement setting some broad regional requirements and guidance but, below these, empowering the wide range of implementing agencies to meet and provide for those requirements as they deem fit in the light of local circumstances. Nevertheless, we consider that some form of high-level implementation strategy is required, prepared by a regional co-ordinating body with the membership and status to prepare a broad prioritised infrastructure budget, make bids and lobby funders and arbitrate in the case of disputes. It is not for us to be prescriptive about the form that this should take. We note that a Regional Partnership Group has recently been set up and that some of its functions seem to overlap with these activities but this was criticised as a group meeting in private. We do not know whether it could be developed to take over the role we have described or whether a different, dedicated organisation is required.
- 11.16 We are conscious of the need to avoid too much (and too many tiers of) bureaucracy and stress that we see this regional co-ordinating body as a big-hitting champion of the long-term investment needs of the region rather than a new empire that will dictate to more local delivery vehicles in whatever terms they may be devised. It may also be that the inter-regional dimension of the Thames Gateway adequately covers the functions described above, in which case that area could possibly be kept separate from the East of England arrangements since Essex Thames Gateway is already covered by a number of tiers to which we would not wish to add unnecessarily. Similar considerations may apply to the inter-regional MKSM Growth Area and its delivery arrangements. However, we could see a case for merging any over-arching delivery arrangements for the LSCP Growth Area (if such an entity is retained) with the regional co-ordinating body for the East of England as a whole. This is because some of the largest District housing allocations are outside the LSCP and our recommendations would give added emphasis to that fact. It would also give more equity and transparency of treatment to the Growth Areas, the new growth points, and the key centres recognised as neither of these.
- 11.17 Turning to the more local delivery arrangements covered in policy IMP3, it is clear that matters have moved on since the plan was written. There are now established organisations in some areas, already making progress in coordinating the delivery of infrastructure and other common requirements, and implementing plans. In other areas (notably Stevenage and Harlow) it was apparent that at the time the matter was discussed at the EiP little progress had been made in creating a cross-border body with the responsibilities and powers to carry-out the necessary wide-ranging actions. At



Hemel Hempstead new cross-border delivery arrangements would be required to give effect to our recommendations.

- 11.18 Consequently, in our view IMP3 needs redrafting to provide a more general coverage of the roles of the LDVs, omitting description of particular areas. If necessary such references could be included in the supporting text.
- 11.19 At **R11.2** we have brought together the recommendations summarised above in the form of a single policy covering implementation and delivery, replacing IMP1-3. With regard to Appendix F we heard that EERA intended to be proactive and have an implementation document of some description available for consultation at the stage of the Secretary of State's Proposed Changes. We do not consider that the present form of Appendix F is particularly helpful and it would anyway require extensive change if our recommendations are taken forward. In the circumstances, we make no recommendation about it, but find EERA's proposal constructive.

#### **Policy IMP4: Monitoring and Appendix D (Targets and Indicators)**

- 11.20 EERA's annual monitoring reports (AMRs), the first of which was prepared in 2000, are now evolving into a process of monitoring the RSS (alongside other regional strategies such as the RHS and the RES). Efforts are also being made to take on board new sources of guidance including the good practice guides on monitoring RSSs and LDFs and the development of core national output indicators. In the light of this EERA accepted that some of the content of Appendix D looks a little dated.
- 11.21 Appendix D contains a set of some 61 targets and/or indicators, all linked to one or more particular policies in the RSS. We have recommended substantial changes to the order and content of these policies and, as we indicated at the EiP, we do not consider it good use of our time to comment in detail on all the targets and indicators in the current appendix.
- 11.22 In general terms our recommendations (**R11.3**) are:
- It would be better to have good comparative information about a limited number of the key objectives and policies of the RSS rather than over-reaching to set up a more complex, possibly less reliable, monitoring system from the outset. This would mean starting with a relatively limited set of core output SMART indicators which relate directly to the terms of the RSS policies, can be collected readily and reliably without placing undue burdens on those charged with the responsibility of collection, and provide time-series information that can be genuinely useful as an input to policy reviews. The ODPM's core output indicators provide a basic set, although some are very partial. (For example the transport indicator is restricted to a single and extremely narrow strand of the multi-faceted actions that will have to be taken to address modal shift objectives. Considered on its own, it would not offer more than a very limited insight.) After establishing the basic data series, RSS monitoring can then be progressively built up to include a more extensive and sophisticated set of indicators as and when reliable data sources have been established and agreed and collections mechanisms put in place.
  - Some 16 or so of the indicators in Appendix D are described as "contextual" although the good practice guide (PGN49) states that the number of such indicators should be kept to a necessary minimum. We are not convinced that there are always very clear cross-linkages between the identified contextual indicators and the subject matter of the policies to which they are said to be related, or that some have enough central relevance to the RSS, as opposed to other plans/strategies/decision-taking contexts (eg Nos 41, 42, 51, 60). There appears to be a good case for inclusion of some of the contextual indicators, especially where they are readily available at the right level of

geographical specificity. However, we consider that the number should be pruned and that (where there are resource limitations) effort would be better employed on developing the output indicators.

- 11.23 A number of participants suggested issues which they felt should be added or monitored in greater depth as part of the RSS. In many cases other strategies have, or should have, monitoring frameworks which should help to shed light on the implementation of RSS policies. Examples are the Regional Housing Strategy, the RES and the Biodiversity Action Plan. Intelligent use of information from these and other strategies will help provide a broad framework for monitoring the RSS with the minimum of extra effort on data collection. The AMR already shows this happening.
- 11.24 It is important, however, that the AMR serves a targeted policy review approach and is not merely a compendium of data. There are key policy objectives for the RSS, including ones which we have added or strengthened through our recommendations, on which we believe future monitoring reports should focus particular attention. Apart from the obvious one of the level of housing delivery, we believe it is important to keep a check on progress in introducing water savings and energy efficiency in new development, as well as the contextual indicators of overall water and energy use. On water efficiency we did not get a clear picture from the Environment Agency of what systematic measuring of the performance of development was possible. The same is true for energy efficiency. These matters will need to be considered further in terms of what information it is practicable to provide. Even though they are not within the conventional scope of planning information, since both water and energy savings are in our view critical to the RSS as a sustainable development strategy, they should be considered in monitoring it.
- 11.25 Likewise, key objectives of the RTS are fundamental to the strategy, particularly slowing and reducing growth in road traffic and increasing public transport use. Data that will help in monitoring those matters are already represented in items 34 and 35 of Appendix D. Reporting on these aspects will need to focus on the RTS targets for reducing traffic and increasing public transport use in all the Key Centres identified in the spatial strategy.
- 11.26 As explained above we have not commented in detail on the 61 indicators but our comments on some particular examples are as follows:
- (3, 13, 14) – What is the significance of the size-splits between the settlements? Does the benefit of collecting information to this degree of detail (five categories in No 3) outweigh the additional collection costs?
- (12) – We consider that the consistent monitoring of net changes in employment in the various geographical sub-divisions of the plan (Nos 11 and 12) is an issue that requires special consideration by the regional monitoring group, as is that of jobs targets versus workplace targets. Although we have recommended placing a slightly different (and more general) role on the employment “targets”, it is important that this question is addressed if they are to have any meaning.
- (25) – This is a good example (though only one of many) of an indicator that should be deleted unless it can be really tightly-specified, otherwise there can be no hope of useful comparative information being forthcoming from the local authorities who are supposed to be reporting upon it annually. For example what exactly is/are “knowledge-based and employment cluster developments”? Even if the terms are agreed is the information available to monitor them and what would it be?

(28) – We consider that it would be helpful to monitor progress with affordable housing by not only recording annual completions but also the numbers/percentages of units coming forward through new planning permissions, as this will help to reveal whether current (as opposed to past) planning decisions are bringing about better achievement of the RSS indicative targets. It would also be helpful to record whether units have been brought about through “mainstream” developments or those provided under the specialised powers relating to rural areas.

- 11.27 In the light of the conclusions above our recommendations for amending Policy IMP4 and Appendix D are set out at **R11.3** and **R11.4**.

### **Review of the RSS**

- 11.28 We have commented in several places on issues for the first review of the RSS once it is adopted. Draft Plan Policy SS2 states the intention for an early review to investigate the need for a large new settlement within the region. Instead of this we propose that the review should be referred to in a separate policy in the IMP section. In the discussion of Matter 9B EERA set out a possible programme for a revision of the RSS which would look forward to the period 2021 to 2031. Starting in 2007, with an EiP in 2008/9, final adoption might be in 2010, for a RSS dealing with the period 2011-31. While we strongly support the intention to get ahead of the game in this way, we think it may not be entirely realistic to set quite such a rapid timetable, and there are important reasons for taking time to make sure that the next version of the RSS is as soundly based as possible. Even if it were not finally adopted until 2011, as a strategy looking forward a full 20 years it will still be a considerable advance on the present RSS which will cover just under 15 years by the time it is adopted.
- 11.29 EERA suggest that work would need to begin shortly after “the ink is dry” on this RSS, leading to consultation on options in 2008. This will be a vitally important stage, and one which, hindsight suggests, needs a more thoroughgoing approach than was followed for the draft Plan. There needs to be consultation on genuine locational alternatives, particularly for new settlements. This should ensure that the evidence base, the extent and range of options and the basis for choosing between them has been generally understood and subject to public comment and, if necessary, debate before the new draft RSS is published. Thereafter the aim would be to proceed to the EiP and subsequent stages with a more widely agreed and supported package than happened this time, although there are obviously likely to be matters still in dispute.
- 11.30 We appreciate the view of HBF and others that failings in the present draft Plan should be put right now and not left for a further review. This is very much what we have sought to do through our recommendations – the EiP has been very constructive in suggesting ways in which the RSS can be made more robust, provide a clearer steer on the policy direction for the region and a framework for delivering development that the region needs. None of this should need to be fundamentally reopened through the next review. It is particularly important that the choices we have put forward for growth and development, including Green Belt reviews, are proceeded with urgently. They must not be soft-pedalled against the hope, or risk, that the review will come up with something different. The Plan as we propose it should be changed represents, in our view, an essential and soundly based strategy for the region’s development from now towards 2021. It does not put off for the review anything which should or reasonably can be determined now.
- 11.31 As for the scope of the review, we agree with EERA that many aspects of the RSS policies, changed as we propose, are robust and should not need to be fundamentally reviewed. Continuing work which was referred to at the EiP could lead to refinement and strengthening (without unduly adding to the length) of policies on transport,

employment, renewable energy and landscape and other environmental matters. For waste, the apportionment of municipal waste and a strengthened waste management strategy should be incorporated in the RSS as we recommend in Chapter 10. There will, however, be further policy development to be incorporated at the review stage, particularly on hazardous waste. The primary focus for the review must inevitably be on how to provide for further growth and development in the region for the period 2021 - 31, and any addition that may be possible in the period up to 2021. It is important that this is approached not merely as a search for housing sites but in an holistic fashion considering the economic dimension, and infrastructure, environmental and resource aspects of a strategy for new sustainable communities in the region. It will also need to build in those matters, particularly water supply and wastewater treatment, on which it has not been possible to take a conclusive view this time. If, in the event, the review does not come up with as much development as is being looked for to meet housing needs, or implied by projections of household growth, the basis for this (eg assumptions about higher growth in other regions), needs to be clearly explained and justified.

11.32 The experience of this EiP, and the information currently before us, suggests that the review will need to take in the following factors:

- the new PPS3, when issued, and aspects of the “post Barker” policy approach including housing market assessment and housing market based sub-regions;
- the full implications of the latest national household projections;
- a fuller and more outward looking appreciation of the East of England’s relationship with London and other neighbouring regions, in demographic and economic terms;
- a closer relationship with the Environment Agency and the water industry over water resource issues and the options (and their implications) for water supply towards and beyond 2021;
- the outcome of strategic water cycle studies as recommended in **R9.9**;
- any further development of national policy towards climate change, for example a new PPS;
- the outcome of spending reviews and early consultation with Government on the options, and likely resources, for additional strategic infrastructure investment; and
- full application of SEA in accordance with national guidance, throughout the process from inception, and consideration of “holistic appraisal” to complement the environmental agenda of SEA.

11.33 As to spatial options for development, there is a wide range of possibilities, some of which are alternatives, others which may co-exist in a balanced strategy. Some of these have been touched upon in our sub-regional discussion in Chapter 5. By way of illustration we set out some of the possibilities below:

Further major urban extensions - relevant to all the “Key Centres for Development and Change” identified in our recommended policy SS3, and possibly other towns. We believe that the most readily available options are already reflected in the RSS as we propose it should be changed. Some of these might be added to, and there may be additional directions of growth to follow on. However, with any town there are likely to be limits to the degree to which it can go on being extended, in terms of the functioning of the urban area itself, the transport system and town centre, and the environment of the surrounding area.

Major new settlements – generally taken to be of the order of 25,000 homes, but could be larger, and would be smaller in the first instance. One or two of these could be considered within the region. Given the need to create from scratch all the components of a sustainable town - not just housing but an appropriate employment base, town centre, all the various items of infrastructure and strategic transport connections - it could be seen as a fairly footloose option. The most obvious locations are in the vicinity of Stansted and more broadly within the LSCP Growth Area. Particular attention would need to be given to where the jobs will come from. We do not consider it would be robust to base such a settlement entirely upon the expansion of Stansted Airport in the light of what we have heard about the prospective growth of direct employment there. However, there may be opportunities for wider growth sectors for which there is advantage in a location close to the Airport. Funding and arrangements for delivery, possibly on a Development Corporation model, will be another major area of concern.

Smaller new settlements - a plethora of such suggestions, ranging from approximately 4,000 to 10,000 homes in size, have been examined in the LSCP growth studies, and many were covered in submissions to the EiP. Options include both new locations and expanding existing developments. While such settlements can be the best way of addressing an identified sub-regional need, there are also questions about how far they can provide truly sustainable communities as opposed to car-borne commuter dormitories. The lack of convincing evidence about the ability of such development to support a strong local employment base and services, and/or sustainable transport links to larger centres is one of the reasons why we have not endorsed specific proposals for further freestanding developments of this size this time. If they are to play a greater role in the future settlement structure of the region this will have to be addressed.

“Organic” growth of existing settlements - urban capacity has been a major component of the total housing provided for in the draft Plan, and will continue to be so. This cannot, however, simply be regarded as a constant source of supply. In some towns, as the easier opportunities are used up, the urban fabric and historic character of town centres and other areas may set limits to the yield that can be achieved. In others, however, central and inner urban areas may show considerable further scope for intensification and development which has not previously been perceived as part of the urban capacity. This situation may apply to some of the relatively small towns within the London Arc, with a choice to be made between some change to the urban character and spreading “suburbanisation” at the periphery. An important input to options for the review will be clear assessments (and possible alternative scenarios) of the growth role within individual towns.

- 11.34 The above comments arise from the matters that have become apparent through the EiP. They are not meant to be comprehensive, or to steer the review towards particular choices. They do, however, indicate the way we believe some of these choices will need to be assessed in order to overcome some of the dissatisfaction expressed by HCC and others with the way the strategy in the draft Plan evolved. To make the intention clear towards the review we recommend (R11.5) that this is made the subject of a separate policy in the RSS.

## RECOMMENDATIONS:

### R11.1

Revise the form and content of the RSS, including the Key Diagram, RTS diagram and other illustrations in line with our conclusions in paragraphs 11.1-11.7 above.

**R11.2** Replace policies IMP1, IMP2 and IMP3 as follows:

**IMP1: Implementing the RSS**

Implementation will be secured through:

- the establishment of a regional co-ordinating body which will devise a region-wide implementation plan including a broad prioritised infrastructure budget, secure sufficient funding for essential physical and social infrastructure to be provided in step with regionally and locally identified needs, and arbitrate in the case of disputes;
- ensuring early preparation of LDDs for the sub-regions and key centres of development and change and identifying any critical infrastructure or service milestones; and
- the work of individual Local Delivery Vehicles (LDVs) with responsibility for implementing the approved proposals for the sub-regions and key centres of development and change. The roles, functions and compositions of the LDVs will be locally determined and vary according to circumstances but must be strong enough to meet the nature and scale of the local challenges.

(Update the supporting text with what is currently known about the pattern of LDVs, recognising that the information currently included in IMP3 is out-of-date and not comprehensive.)

**R11.3** Replace IMP4 with a new policy IMP2 as follows:

**IMP2: Monitoring the RSS**

Annual monitoring will track the delivery of development and all the related components of sustainable communities, focusing particularly on:

- a) Progress towards delivery of infrastructure of all types necessary to support development and economic success;
- b) Progress in the delivery of housing and evidence of housing need and housing market conditions, including affordability;
- c) Progress in the development of the region’s economy, in particular the growth of employment and its alignment with housing and population growth; and
- d) Delivery of the environmental and other objectives of the RSS, in particular with regard to water consumption and emissions.

The results of such monitoring will be considered by the regional co-ordinating body referred to in Policy IMP1, which will consider any need to review regional budgets and other aspects of implementation.

EERA will publish an annual monitoring report and thereafter consider whether its findings indicate a need for any particular action(s) to be taken to implement the policies of the RSS and/or any need for its policies to be reviewed.

EERA will also keep its monitoring arrangements under review, in liaison with local authorities and other key partners. A particular aim will be to improve the efficiency and effectiveness of the monitoring process by ensuring that reliable and appropriate indicators have been set and clear mechanisms put in place for collection of the necessary data.”

**R11.4**

Change Appendix D to reflect the alterations to the RSS policies and the general observations set out at paragraphs 11.20-11.27 above.

**R11.5** Include a new policy IMP3 to read as follows:

**IMP3: Review of the RSS**

A review of the RSS will be undertaken to investigate and make provision for the development needs of the East of England for the period 2011 to 2031. The review will consider spatial options, including the role of one or more large new settlements within the region and, if appropriate, will make proposals for:

- the role of any new settlement in relation to spatial, economic social and environmental criteria;
- the location(s) for the development; and
- implementation mechanisms.

The supporting text to the policy should refer to the intended broad timetable for the review and its approach and scope, having regard to the points considered at paragraphs 11.28-11.32 above.





## CHAPTER 12 - SCHEDULE OF RECOMMENDATIONS

Location / Para Number	Recommendation
<b>Chapter 3</b>	
Para 3.9	<p><b>R3.1</b> Additional Strategic Environmental Assessment work should be commissioned to assess the RSS in the form in which it is proposed to be changed by the Secretary of State on consideration of our recommendations. Further SEA should follow an approach to scoping and the identification of issues compatible with that of the previous SEA work, and should consider in particular whether the changes (assuming they follow our recommendations) adequately address the issues raised by the SA/SEA report EERA3. The results should form a new SA/SEA report published at the same time as consultation on the proposed changes. Either as part of that report or separately, the Department should also publish the results of any “appropriate assessment” carried out on the RSS in relation to protected European sites under the Habitats Directive.</p>
Para 3.11	<p><b>R3.2</b> Consideration should be given, if not on this occasion then for future reviews, to conducting an “holistic appraisal” of the Plan’s economic performance and fulfilment of requirements relating to social needs, good governance and application of sound science, as well as environmental sustainability.</p>
Para 3.23	<p><b>R3.3</b> After the RSS has been finalised, consideration should be given to conducting a broad inter-regional review to help establish a coherent inter-regional perspective and evidence base for future RSS reviews. Details are for further consideration but account should be taken of the suggestions in paragraphs 3.22 and 3.23 above.</p>
Para 3.25	<p><b>R3.4</b> In place of paragraph 3.2 of the draft Plan the RSS should include the following overall spatial vision: “By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people by meeting their housing needs in sustainable and inclusive communities. At the same time it will reduce its impact on climate change and</p>

Location / Para Number	Recommendation
Para 3.27	<p>the environment through savings in energy and water use and by strengthening its stock of environmental assets.”</p> <p><b>R3.5</b> Replace the objectives listed in paragraph 3.3 of the draft Plan with the following set of RSS objectives:</p> <p><u>Objective 1:</u> To reduce the region’s impact on and exposure to the effects of climate change by:</p> <ul style="list-style-type: none"> <li>- locating development so as to reduce the need to travel;</li> <li>- effecting a major shift in travel towards public transport, walking and cycling and away from car use;</li> <li>- maximising the energy efficiency of development and promoting renewable energy generation; and</li> <li>- minimising the risk of flooding.</li> </ul> <p><u>Objective 2:</u> To increase housing opportunities for people in the region by:</p> <ul style="list-style-type: none"> <li>- securing a step change in the delivery of additional housing throughout the region, and especially in the Growth Areas; and</li> <li>- recognising a priority for the provision of affordable housing to meet identified needs, particularly in rural areas.</li> </ul> <p><u>Objective 3:</u> To realise the economic potential of the region and its people by:</p> <ul style="list-style-type: none"> <li>- facilitating the development needed to support the region’s business sectors and clusters and improvement of skills and the widening of opportunities in line with the Regional Economic Strategy;</li> <li>- providing for job growth broadly to match increases in housing and to improve the alignment between workplaces and homes;</li> <li>- maintaining and strengthening the region’s inter-regional connections particularly by improving connections to economic opportunities in London; and</li> <li>- ensuring adequate and sustainable provision of transport infrastructure.</li> </ul> <p><u>Objective 4:</u> To improve the quality of life for the region’s people by:</p> <ul style="list-style-type: none"> <li>- ensuring new development fulfils the principles of sustainable communities, providing a well designed living environment adequately supported by social and green infrastructure;</li> <li>- promoting social cohesion by improving access to work, services and other facilities especially for those who are</li> </ul>

Location / Para Number	Recommendation
	<p>disadvantaged;</p> <ul style="list-style-type: none"> <li>- maintaining cultural diversity while addressing the distinctive needs of each part of the region;</li> <li>- regeneration and renewal of disadvantaged areas; and</li> <li>- increasing community involvement in the implementation of the strategy at the local level.</li> </ul> <p><u>Objective 5:</u> To improve and conserve the region’s environment by:</p> <ul style="list-style-type: none"> <li>- ensuring the protection and enhancement of the region’s environmental assets, including the built and historic environment, landscape and water;</li> <li>- re-using previously developed land and seeking environmental as well as development gains from the use of previously undeveloped land;</li> <li>- protecting and where appropriate enhancing biodiversity through the protection of habitats and species, and new habitat creation through development;</li> <li>- provision of a network of multi-function greenspace accessible to the region’s people; and</li> <li>- minimising the demand for and use of water and other natural resources and reducing waste and increasing sustainable management of waste.</li> </ul>
<b>Chapter 4</b>	
<p>Para 4.10</p>	<p><b>R4.1</b> Insert a new overarching spatial strategy policy SS1 as follows:</p> <p><b>SS1: Achieving sustainable development (overarching policy)</b></p> <p>The strategy seeks to bring about sustainable development by applying:</p> <p>(1) The guiding principles of the UK Sustainable Development Strategy 2005:</p> <ul style="list-style-type: none"> <li>- living within environmental limits;</li> </ul>

Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- ensuring a strong, healthy and just society;</li> <li>- achieving a sustainable economy;</li> <li>- promoting good governance;</li> <li>- using sound science responsibly; and</li> </ul> <p>(2) The elements contributing to the creation of sustainable communities as expressed in Sustainable Communities: Homes for All, summarised as being:</p> <ul style="list-style-type: none"> <li>- active, inclusive and safe (in terms of community identity and cohesion, social inclusion and leisure opportunities);</li> <li>- well run (in terms of effective participation, representation and leadership);</li> <li>- environmentally sensitive;</li> <li>- well designed and built;</li> <li>- well connected (in terms of good transport services);</li> <li>- thriving (in terms of a flourishing and diverse economy);</li> <li>- well served (in terms of public, private, community and voluntary services); and</li> <li>- fair for everyone</li> </ul> <p>To do this, local development frameworks and other statutory and non-statutory strategies relevant to spatial planning within the region will aim to:</p> <ul style="list-style-type: none"> <li>(a) assist the achievement of national obligations under the Kyoto Treaty; and</li> <li>(b) adopt a precautionary approach to climate change by avoiding or minimising potential contributions to adverse change and incorporating measures which adapt as far as possible to unavoidable change.</li> </ul> <p>In particular, the spatial strategy seeks to ensure that development in the region:</p> <ul style="list-style-type: none"> <li>- maximises the potential for people to form more sustainable relationships between their homes, workplaces, and other concentrations of regularly used services and facilities, and their means of travel between them; and</li> <li>- respects environmental limits by seeking net environmental gains wherever possible, or at least avoiding harm, or (where</li> </ul>

Location / Para Number	Recommendation
<p>Paras 4.11 &amp; 4.20</p>	<p>harm is justified within an integrated approach to the guiding principles set out above) minimising, mitigating and/or compensating for that harm.</p> <p><b>R 4.2</b> Insert a new spatial strategy policy SS2 as follows:</p> <p><b>SS2: The overall spatial strategy</b></p> <p>In seeking the more sustainable relationships described in Policy SS1 the spatial strategy primarily directs strategically significant growth to the region’s major urban areas where:</p> <ul style="list-style-type: none"> <li>- strategic networks connect and public transport accessibility is at its best, and has the most scope for improvement; and</li> <li>- greatest opportunity is present to build upon existing concentrations of activities and physical and social infrastructure and to use growth as a means of extending and enhancing them efficiently;</li> </ul> <p>Within this context LDDs will develop policies which:</p> <ul style="list-style-type: none"> <li>- ensure that new development contributes towards the creation of more sustainable communities in accordance with the definition above and, in particular, require that new development contributes as appropriate to the improvement of quality of life, community cohesion and social inclusion, including making appropriate and timely provision for the locally identified needs of the health and social services sectors and the primary, secondary, further and higher education sectors, particularly in areas of new development and in the priority areas for regeneration; and</li> <li>- adopt an approach to the location of major development which prioritises the re-use of previously developed land in and around urban areas to the fullest extent possible while ensuring provision of an adequate total supply of land for development consistent with the achievement of a sustainable pattern of development and the delivery of housing in accordance with Policy H1.*</li> </ul> <p>NB * The overall regional target for the re-use of previously developed land is set at 60% although the extent to which this is achieved will vary across the region. It may be necessary at certain times and in particular places (as identified in LDDs) to depart from the strict terms of a sequential approach to previously developed land if this is essential to bring forward development to meet the requirements of Policy H1, provided this is otherwise consistent with the principles of sustainable development.</p> <p>[Supporting text: Consolidate at this point appropriately edited/augmented references to region-wide social and community issues, incorporating any relevant material from paragraphs 4.56-4.61 and 11.36-11.40.]</p>

Location / Para Number	Recommendation																				
<p>Paras 4.11 &amp; 4.20</p>	<p><b>R 4.3</b> Insert a new spatial strategy policy SS3 as follows:  <b>SS3: Key regional centres for development and change:</b>                      In order to achieve the aims of policies SS1 and SS2, new development to 2021 will be concentrated at the following locations (in alphabetical order):</p> <table border="0"> <tr> <td>Basildon</td> <td>Bedford/Kempston/Northern Marston Vale</td> </tr> <tr> <td>Bury St Edmunds</td> <td>Cambridge</td> </tr> <tr> <td>Chelmsford</td> <td>Colchester</td> </tr> <tr> <td>Great Yarmouth</td> <td>Harlow</td> </tr> <tr> <td>Hatfield and Welwyn GC</td> <td>Hemel Hempstead</td> </tr> <tr> <td>Ipswich</td> <td>King’s Lynn</td> </tr> <tr> <td>Lowestoft</td> <td>Luton/Dunstable/Houghton Regis</td> </tr> <tr> <td>Norwich</td> <td>Peterborough</td> </tr> <tr> <td>Southend-on-Sea</td> <td>Stevenage</td> </tr> <tr> <td>Thetford</td> <td>Thurrock urban area</td> </tr> </table> <p>The scale, nature and rate of development and change in these areas will vary according to local circumstances and the distinctive regional growth role of each of the towns listed as Key Centres. Concentrating development at these locations will make the most of existing infrastructure and the potential for improvements or extensions to it.</p> <p>Where key centres adjoin local authority boundaries local planning authorities will need to work jointly or closely together to develop co-ordinated strategies and delivery mechanisms.</p> <p>The principal aims for each of the above centres (and, where relevant, its place within a sub-regional approach) are set out at the Sub-Regional chapter, Chapter 10.</p>	Basildon	Bedford/Kempston/Northern Marston Vale	Bury St Edmunds	Cambridge	Chelmsford	Colchester	Great Yarmouth	Harlow	Hatfield and Welwyn GC	Hemel Hempstead	Ipswich	King’s Lynn	Lowestoft	Luton/Dunstable/Houghton Regis	Norwich	Peterborough	Southend-on-Sea	Stevenage	Thetford	Thurrock urban area
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Thetford	Thurrock urban area																				
<p>Paras 4.11 &amp; 4.21</p>	<p><b>R 4.4</b> Include a new policy SS4, based on a changed version of policy SS9  <b>SS4: Development in other towns and rural areas</b></p>																				

Location / Para Number	Recommendation
Para 4.27	<p>Development will take place in other towns to the extent identified in local development documents. Such towns will include selected market towns serving rural areas and other towns with the potential to increase their degree of economic and social self-sustainability through measures to:</p> <ul style="list-style-type: none"> <li>- support urban and rural renaissance;</li> <li>- secure appropriate amounts of new housing (including affordable housing), and local employment and other facilities; and</li> <li>- improve the town's accessibility, especially by public transport.</li> </ul> <p>Local development documents will also consider the potential of other key service centres to accommodate new smaller-scale development which is sympathetic to local character and of an appropriate scale and nature to accommodate local housing and employment needs.</p> <p>In all other rural settlements and related communities local development documents should seek to assist the continued viability of agriculture and other rural economic activities (such as tourism), the diversification of the rural economy, the provision of housing for local needs, and support for the sustainability of local services.</p> <p><b>R4.5</b> Include a changed version of draft Plan Policy SS11 as follows:</p> <p><b>SS5: Priority areas for regeneration</b></p> <p>Include a changed version of draft Plan Policy SS11, subject to further editing to improve clarity in accordance with paragraphs 4.26-4.27 above, as follows:</p> <ul style="list-style-type: none"> <li>• areas with weak economic performance and high deprivation:- Essex Thames Gateway; Great Yarmouth and Waveney; Kings Lynn and West Norfolk; the remote rural areas of Norfolk and Suffolk, and the Fens (transitional EU objective 5b areas see map 11.1).</li> <li>• areas with high deprivation:- Luton/Dunstable/Houghton Regis; Bedford/Kempston; Harlow and the Lee Valley; Haven Gateway (Ipswich/Harwich/Colchester/Clacton); Peterborough; Norwich; Stevenage; and parts of Cambridge (King's Hedges and Arbury wards) and St Edmundsbury (Clements and Northgate wards).</li> </ul> <p>Local development documents will set out policies to tackle the problems of economic, social and environmental deprivation in these areas together with policies for other areas with locally significant need for regeneration.</p> <p><b>R4.6</b> Include a changed version of policy SS5 as follows:</p>
Para 4.22	

Location / Para Number	Recommendation
	<p><b>SS6: City and Town Centres</b></p> <p>Thriving, vibrant and attractive city and town centres are fundamental to the sustainable development of the East of England and will continue to be the focus for investment, environmental enhancement and regeneration.</p> <p>Local development documents, supported by transport plans and relevant economic, environmental and cultural strategies, will:</p> <ul style="list-style-type: none"> <li>• include a strategy for each city or town centre to define its role (or redefine it where necessary), manage change, promote a healthy mix of uses, build upon positive elements of its distinctive character, and support the development and consolidation of the local cultural heritage;</li> <li>• ensure that land is allocated or can be made available to meet the full range of the city or town centre’s identified needs; and</li> <li>• protect and enhance existing neighbourhood centres and, where need is established, promote the provision of new centres of an appropriate scale and function to meet local day to day needs.</li> </ul>
Para 4.24	<p><b>R 4.7</b> Include a changed version of policy SS7 as follows:</p> <p><b>SS7: Green Belt</b></p> <p>The broad extent of Green Belts in the East of England is appropriate, and will be maintained. However, strategic reviews of Green Belt boundaries are needed at the areas identified below to meet regional needs for development at the most sustainable locations:</p> <ul style="list-style-type: none"> <li>- Stevenage, involving land in Stevenage and North Herts and including the consideration of compensating extension to the Green Belt;</li> <li>- Hemel Hempstead, involving land in Dacorum and St Albans;</li> <li>- Harlow, involving land in Harlow and in Epping Forest District;</li> <li>- Welwyn/Hatfield;</li> <li>- Luton/ Dunstable/ Houghton Regis, in relation to the provisions of the MKSM SRS and including the consideration of compensating extension to the Green Belt involving land in South Beds and North Herts Districts; and</li> <li>- More local review will be required in Broxbourne (the Upper Lee Valley).</li> </ul> <p>These reviews will have to satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that</p>



Location / Para Number	Recommendation
Para 4.25	<p>sufficient land is identified to avoid further Green Belt review before 2031. Where reviews cover more than one local authority area, the expectation is that they will be undertaken through a joint approach.</p> <p>The RSS does not provide for review of the Cambridge Green Belt beyond that undertaken recently through the Structure Plan and related local plans/LDDs.</p> <p>In order to maintain the broad extent of Green Belts across the region, the above reviews will consider possible needs for compensatory additions to the Green Belts. These will have to satisfy the national criteria for designation and complement delivery of the spatial strategy. Such extensions will be proposed in local development documents. In cases where the proper consideration of compensatory additions affects land in more than one administrative area local planning authorities will prepare co-ordinated and complementary strategies for such additions.</p> <p><b>R 4.8</b> Include a changed version of policy SS8 as follows:</p> <p><b>Policy SS8: Land in the urban fringe</b></p> <p>Local authorities will work together with developers and other agencies to secure the enhancement, effective management and appropriate use of land in the urban fringe through formulating and implementing strategies for urban fringe areas across administrative boundaries where appropriate.</p> <p>Local development documents will:</p> <ul style="list-style-type: none"> <li>- ensure that new development in or near the urban fringe contributes to enhancing its character and appearance and its recreational and/or biodiversity value;</li> <li>- seek to provide connected networks of accessible green space linking urban areas with the countryside; and</li> <li>- set targets for the provision of green space for planned urban extensions.</li> </ul>
Para 4.28	<p><b>R4.9.</b> Include a changed version of policy SS15 as follows:</p> <p><b>SS9: The coast</b></p> <p>The strategy for the coast is to adopt an integrated approach that recognises the needs of the coast for environmental protection and enhancement and the economic and social role of the region's ports, seaside towns, and other coastal areas important to tourism. Within this approach local planning authorities and other agencies will seek, through their plans and management strategies, to achieve:</p>

Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- the regeneration of coastal towns and communities, reinforcing their local economic and social roles and their importance to the wider region; and</li> <li>- the conservation of the coastal environment and coastal waters, particularly the natural character, historic environment and tranquillity of undeveloped areas.</li> </ul> <p>Local development documents will:</p> <ul style="list-style-type: none"> <li>• adopt policies which support the restructuring of the coastal economies and the provision of jobs to satisfy local needs;</li> <li>• treat Great Yarmouth, Lowestoft, Ipswich, Harwich and Felixstowe as regional strategic employment locations in accordance with policy E4;</li> <li>• ensure, in the case of any coastal resort that: <ul style="list-style-type: none"> <li>- the town centre continues to provide for local and visitor needs;</li> <li>- improved linkages are created between the town centre and the main leisure area(s) to secure mutual strengthening of their vitality and viability; and</li> <li>- retailing in the main leisure area(s) is limited to that necessary to support the vitality and viability of the leisure function without having an adverse effect on the retail function of the town centre.</li> </ul> </li> <li>• ensure that new development is compatible with shoreline management plans (shown in Table 4.1), so as to avoid constraining effective future flood management or increasing the need for expensive new sea defences;</li> <li>• protect important coastal environmental assets if it is practicable and sustainable to do so without causing adverse impacts elsewhere. If it is not practicable to protect sites and habitats in situ, shoreline management plans and development plans will include proposals for their long-term replacement or the recording of historic assets;</li> <li>• investigate and pursue opportunities for creation of new salt marsh and mudflat by managed realignment in areas identified for retreat. New development will not be permitted in such areas.</li> </ul> <p><b>R4.10</b> Delete draft Plan policies SS6, SS10, SS12 and SS13.</p> <p><b>R4.11</b> Insert a changed version of policy SS16 into the Environment Chapter as follows:</p> <p><b>ENVxxx: Achieving quality in the built environment</b></p>

Location / Para Number	Recommendation
Para 4.11	<p>Local development documents will require new development to be of high quality which:</p> <ul style="list-style-type: none"> <li>- either complements the distinctive character and best qualities of the local area or (in areas identified in an LDD as requiring a new preferred townscape/landscape character) assists the necessary process of transition;</li> <li>- assists urban renaissance and regeneration where appropriate;</li> <li>- provides landmark buildings of an appropriate scale;</li> <li>- makes efficient use of land;</li> <li>- in the case of housing development: <ul style="list-style-type: none"> <li>- is built at the highest possible net density commensurate with an assessment of the character of the locality, and no less than 30 dwellings per hectare;</li> <li>- delivers greater intensity and density of development in places with good public transport accessibility, while respecting local character objectives (see above);</li> </ul> </li> <li>- provides a mix of uses and building types where appropriate;</li> <li>- has regard to the needs of all sectors of the community;</li> <li>- addresses crime prevention, community safety and public health;</li> <li>- promotes resource efficiency, and more sustainable construction, including maximum use of re-used or recycled materials and of local and traditional materials;</li> <li>- reduces pollution;</li> <li>- maximises opportunities for the built heritage to contribute to physical, economic and community regeneration; and</li> <li>- maximises opportunities for access by a choice of travel modes.</li> </ul> <p><b>R4.12</b>      Insert a changed version of policy SS14 into the Environment Chapter as follows:</p> <p><b>ENV xxx: Achieving long-term safety from flood risk</b></p> <p>Risk of coastal and river flooding is a significant factor in parts of the East of the England. The priorities are to defend existing properties from flooding and, wherever possible, to locate new development in locations with little or no risk of flooding.</p>

Location / Para Number	Recommendation
	<p>Local development documents will therefore:</p> <ul style="list-style-type: none"> <li>• promote the use of strategic flood risk assessments to guide development away from floodplains, other areas at risk (or likely to be at future risk) from flooding, and areas where development would increase the risk of flooding elsewhere;</li> <li>• include policies to protect flood plains and land liable to tidal or coastal flooding from development, based on the Environment Agency's flood zone maps, supplemented where necessary by historical and modelled flood data (eg Section 105 maps) and indications as to other areas which could be at risk in future (including proposals for 'managed retreat' where appropriate);</li> <li>• only propose departures from the above principles in exceptional cases where suitable land at lower risk of flooding is not available, and the benefits of development outweigh the risks from flooding, and appropriate mitigation measures are designed into the scheme; and</li> <li>• require that sustainable drainage systems are employed in all appropriate developments.</li> </ul>
<b>Chapter 5</b>	
<p>Para 5.3</p> <p>Paras 5.8, 5.9 &amp; 5.17</p>	<p><b>R5.1</b> The sub-regional policies of the Plan should come in a chapter to follow all the Spatial Strategy and thematic policies (but before the Implementation Chapter) and should contain strategies for each of the sub-regions and individual policies for the Key Centres for Development and Change (KCDCs) not covered by those sub-regions.</p> <p><b>R5.2</b> Delete draft Plan Policies TG/SE1-7 and replace with New Policies for Essex Thames Gateway</p> <p><b>Policy ETG1: Strategy for the sub-region</b></p> <p>The sub-regional strategy aims to achieve transformational development and change throughout Essex Thames Gateway which will:</p>

Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- substantially increase the numbers of homes and jobs to bring about greater sub-regional alignment of homes and workplaces while also continuing to recognise and make the most of the area’s complementary role in relation to London, especially the emerging development/transport nodes in East London at Stratford and elsewhere;</li> <li>- give the area a more positive and attractive image by building on its strengths and assets, promoting excellence in the design of buildings and the public realm, and creating new townscapes and landscapes of high quality and distinctiveness;</li> <li>- significantly increase the overall value of the sub-regional economy, and the economic conditions, living standards, aspirations, and quality of life of its residents;</li> <li>- enhance the education and skills base and improve access to higher education;</li> <li>- protect and enhance the quality of the natural environment, including retaining the Green Belt and aiming to make more positive appropriate use of it;</li> <li>- create the conditions for major modal shift towards public transport use by developing high quality/high frequency inter- and intra-urban spines across ETG; and</li> <li>- bring about improvements to the strategic transport networks, particularly for the efficient movement of freight.</li> </ul> <p><b>Policy ETG2: Key Centre for Development and Change: Thurrock</b></p> <p>The Thurrock Urban Area (from Purfleet in the west to Tilbury/Chadwell St Mary in the east) will be a Key Centre for Development and Change. Local development documents for the Borough will aim to:</p> <ul style="list-style-type: none"> <li>- make provision for the housing and employment growth set out at policies ETG5 &amp; HI;</li> <li>- achieve an urban renaissance, re-using previously developed land to bring about substantial improvement in the quality of the urban environment;</li> <li>- upgrade the image of the area as a leading centre for logistics, and enhance the scale and sustainability of its role in that respect, while also seeking to diversify the employment base of the Borough;</li> <li>- link new and existing nodes of development to high quality/high frequency spines of the inter- and intra-urban public transport system to be developed across ETG;</li> <li>- develop a safeguarding policy for wharves and quays considered necessary for the proper strategic functioning of the Port of</li> </ul>

Location / Para Number	Recommendation
	<p>London; and</p> <ul style="list-style-type: none"> <li>- develop (a) a clear long-term strategy for remodelling Lakeside Basin to provide a high-quality, pedestrian friendly environment containing a mix of uses including retail, leisure, offices, residential and areas of public realm, subject to no net increase in retail floorspace, linked with (b) complementary revitalisation strategies for Grays Town Centre and the other urban centres in the Borough.</li> </ul> <p><b>Policy ETG3: Key Centre for Development and Change: Basildon</b></p> <p>Basildon will be a Key Centre for Development and Change. Local development documents for the District will aim to:</p> <ul style="list-style-type: none"> <li>- make provision for the housing and employment growth set out at policies ETG5 &amp; H1;</li> <li>- link new and existing nodes of development to high quality/high frequency spines of the inter- and intra-urban public transport system to be developed across ETG; and</li> <li>- facilitate physical, economic and social regeneration of the original new town together with expansion to create a sustainable and balanced community. This will include regeneration of the town centre to secure a full range of high quality sub-regional services and facilities, including mixed-use development to provide for new jobs and homes, and development of a strategic transport interchange.</li> </ul> <p><b>Policy ETG4: Key Centre for Development and Change: Southend on Sea</b></p> <p>Southend on Sea will be a Key Centre for Development and Change. Local development documents for the District will aim to:</p> <ul style="list-style-type: none"> <li>- make provision for the housing and employment growth set out at policies ETG5 &amp; H1;</li> <li>- facilitate physical, economic and social regeneration of the urban area including maximising the re-use of previously developed land;</li> <li>- link new and existing nodes of development to high quality/high frequency spines of the inter and intra-urban public transport system to be developed across ETG; and</li> <li>- create an urban renaissance of the town centre by establishing it as a focus for cultural and intellectual activities led by the development of a university campus, securing a full range of high quality sub-regional services and facilities, providing for mixed use development to secure new jobs and homes, and upgrading strategic and local passenger transport accessibility,</li> </ul>

Location / Para Number	Recommendation												
	<p>including developing Southend Central and Southend Victoria stations as strategic transport interchanges.</p> <p><b>Policy ETG5: Employment-generating development</b></p> <p>Local development documents will provide an enabling context for not less than 52,000 net additional jobs in ETG during the period 2001-2021, distributed as follows:</p> <table border="1" data-bbox="478 1097 750 1825"> <thead> <tr> <th>District (whole LA area)</th> <th>2001-2021</th> </tr> </thead> <tbody> <tr> <td>Basilidon</td> <td>11,000</td> </tr> <tr> <td>Castle Point</td> <td>2,000</td> </tr> <tr> <td>Southend</td> <td>13,000</td> </tr> <tr> <td>Thurrock</td> <td>26,000</td> </tr> <tr> <td>Total</td> <td>52,000</td> </tr> </tbody> </table> <p>The local authorities and the Thurrock Thames Gateway Development Corporation, supported by regional and local partners, will seek to facilitate these net increases in jobs by promoting a competitive sub-regional business environment, to be secured through:</p> <ul style="list-style-type: none"> <li>- making provision for a range of sites and premises suitable for the needs of existing and future businesses, including the key development site at London Gateway (a new container port facility with associated business park, together supported by strategic rail freight handling facilities) together with other sites that can contribute to supporting Thurrock’s role as a world-leading logistics centre;</li> <li>- providing innovation centres at the key centres for development and change;</li> <li>- improving opportunities for small and medium enterprises in all economic sectors, especially transport and logistics, environmental technologies, healthcare, and tourism and leisure;</li> <li>- raising skill levels at NVQ Level 2, 3 and 4 to national averages, through enhanced provision of further and higher education, to ensure that local residents share in economic success;</li> <li>- focusing major retail, leisure and office developments at Basilidon, Southend and Lakeside and other centres in need of regeneration; and</li> <li>- enhancing use of the River Thames as an asset for business and leisure.</li> </ul>	District (whole LA area)	2001-2021	Basilidon	11,000	Castle Point	2,000	Southend	13,000	Thurrock	26,000	Total	52,000
District (whole LA area)	2001-2021												
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Location / Para Number	Recommendation										
	<p><b>Policy ETG6: Transport infrastructure</b></p> <p>Related regional strategies, local development documents and local transport plans serving Essex Thames Gateway will address present and future needs to 2021, supporting development and regeneration activities by striving to achieve a ‘step-change’ in accessibility standards through the provision of improved transportation infrastructure and better management of existing facilities.</p> <p><b>Policy ETG7: Implementation and delivery</b></p> <p>The Thames Gateway South Essex Partnership will work with its partners to ensure that:</p> <ul style="list-style-type: none"> <li>- appropriate guidance and coordination is available to ensure that local development documents prepared within ETG make complementary contributions towards meeting the objectives of the RSS, with joint working where appropriate; and</li> <li>- the implementation and delivery bodies have appropriate strategies and resources to achieve the objectives reflected in the overall vision for the area at ETG1 and detailed in the other ETG policies.</li> </ul> <p><b>Note: Policy H1</b> allocations within the Essex Thames Gateway Sub-Region are:</p> <table border="0"> <tr> <td>Basildon</td> <td>10,700</td> </tr> <tr> <td>Castle Point</td> <td>4,000</td> </tr> <tr> <td>Rochford</td> <td>4,600</td> </tr> <tr> <td>Southend</td> <td>6,500</td> </tr> <tr> <td>Thurrock</td> <td>18,500</td> </tr> </table>	Basildon	10,700	Castle Point	4,000	Rochford	4,600	Southend	6,500	Thurrock	18,500
Basildon	10,700										
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Thurrock	18,500										
<p>Paras 5.18-5.36</p>	<p><b>R5.3</b> Delete draft Plan Policies HG1 to HG7 and replace with the following:</p> <p><b>New Policy HG1: Strategy for the sub-region</b></p> <p>The sub-regional strategy aims to achieve transformational development and change throughout the Haven Gateway which will:</p> <ul style="list-style-type: none"> <li>- provide for major housing growth at Colchester and Ipswich with the aim of securing throughout the sub-region the earliest possible move to the rates of delivery required to deliver the full provision in Policy H1 by 2021;</li> <li>- provide for 20,000 net additional dwellings in the Ipswich Policy Area 20,000 which will include at least 15,400 within Ipswich, the remainder to be provided on the fringes of Ipswich in Babergh, Mid Suffolk and Suffolk Coastal;</li> </ul>										



Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- seek to regenerate the sub-region to address unemployment, deprivation and social issues;</li> <li>- seek to develop the diverse economy of the sub-region; provide for the needs of an expanding tourism sector both in the urban and rural areas; supporting established and expanding ICT clusters; recognising the potential, and need for local employment growth in the smaller towns of the sub-region; and</li> <li>- support existing and proposed academic, scientific and research institutions.</li> </ul> <p><b>New Policy HG2: Employment generating development</b></p> <p>LDDs will provide an enabling context for not less than 50,000 additional jobs in Haven Gateway distributed as in Policy E2. The local authorities, supported by regional and local partners, will seek to facilitate these net increases in jobs by promoting a competitive sub-regional business environment through:</p> <ul style="list-style-type: none"> <li>- supporting the maintenance and appropriate expansion of the ports, maritime and related activities, recognising the role they play in making the sub-region a major economic growth point;</li> <li>- promoting the urban areas of Colchester and Ipswich as major centres of employment;</li> <li>- providing appropriate sites, premises and infrastructure to attract a diverse range of employment to the Strategic Employment Locations of Ipswich, Colchester, Harwich and Clacton;</li> <li>- major joint regeneration initiatives in East Colchester and St Botolph’s, Ipswich Waterfront and Village;</li> <li>- new Government funded initiatives within Felixstowe and Harwich to address unemployment and deprivation through neighbourhood management and renewal;</li> <li>- local regeneration initiatives at Felixstowe to address its falling status as a resort, social issues and need to diversify the employment base; and</li> <li>- other smaller scale regeneration projects throughout the sub-region.</li> </ul> <p><b>New Policy HG3: Transport infrastructure</b></p>
	<p>Key Priorities for transport in the sub-region are:</p> <ul style="list-style-type: none"> <li>- measures to increase sustainable transport in the main urban areas of Colchester and Ipswich, and to ensure that major new developments are linked into the existing urban areas with sustainable access to workplaces, schools, town centres;</li> </ul>

Location / Para Number	Recommendation										
	<ul style="list-style-type: none"> <li>- facilitating freight movement through the sub-region to and from the ports, particularly by rail, and minimising impact on sub-regional and local networks; and</li> <li>- resolving capacity and congestion problems on the strategic road network while managing the network to avoid inducing additional traffic growth.</li> </ul> <p><b>New Policy HG4: Implementation and delivery</b></p> <p>The Haven Gateway Partnership will work with its partners to ensure that:</p> <ul style="list-style-type: none"> <li>- appropriate guidance and co-ordination is available to ensure that local development documents prepared within HG make complementary contributions towards meeting the objectives of the RSS, with joint working where appropriate; and</li> <li>- the implementation and delivery bodies have appropriate strategies and resources to achieve the objectives in the overall vision for the area at new HG1 and detailed in other new HG policies.</li> </ul> <p><b>Note: Policy H1</b> allocations within the Haven Gateway Sub-Region are:</p> <table border="0" style="margin-left: 20px;"> <tr> <td>Babergh*</td> <td style="text-align: right;">5,000</td> </tr> <tr> <td>Colchester</td> <td style="text-align: right;">17,100</td> </tr> <tr> <td>Ipswich*</td> <td style="text-align: right;">20,000</td> </tr> <tr> <td>Suffolk Coastal*</td> <td style="text-align: right;">7,000</td> </tr> <tr> <td>Tendring</td> <td style="text-align: right;">8,500</td> </tr> </table> <p>*Figures for Babergh and Suffolk Coastal exclude provision within the Ipswich Policy Area on the edge of Ipswich. Figure for Ipswich includes provision in the IPA on the fringes of Ipswich in Babergh, Suffolk Coastal and Mid Suffolk.</p> <p>Replace supporting paragraphs 5.27 to 5.46 with a shortened version including among other things the following key points:</p> <ul style="list-style-type: none"> <li>- explanation of the extent of the sub-region, which should generally be based on whole Districts although it may be practical to subdivide certain districts for monitoring purposes. Inclusion of an Ipswich Policy Area, based on that in the adopted Suffolk Structure Plan;</li> <li>- explanation of key sectors and other aspects of the economic strategy;</li> <li>- inclusion of the figures for job increases in draft plan Policy HG2 as reference values for monitoring purposes;</li> <li>- an indicative breakdown of the Ipswich Policy Area housing provision outside Ipswich between the neighbouring Districts</li> </ul>	Babergh*	5,000	Colchester	17,100	Ipswich*	20,000	Suffolk Coastal*	7,000	Tendring	8,500
Babergh*	5,000										
Colchester	17,100										
Ipswich*	20,000										
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Tendring	8,500										

Location / Para Number	Recommendation
<p>Para 5.41</p>	<p>as follows: Babergh approximately 600 dwellings, Mid Suffolk approximately 800, Suffolk Coastal up to 3200. These amounts are in addition to those Districts’ allocations in Policy H1 and will need to be determined through a partnership approach involving Joint Local Development Documents;</p> <ul style="list-style-type: none"> <li>- reference to the application of Policy ENV1 ( recommended in <b>R9.1</b>) to the sub-region, including the importance of integrated coastal zone management, the Stour and Orwell estuaries and the inland environmental assets (drawing upon Essex CC’s proposed wording for revision of paragraph 5.44); and</li> <li>- reference to the role of the Haven Gateway Partnership as delivery vehicle for the Sub-Region, and the role and status of the proposed non-statutory sub-regional spatial framework.</li> </ul> <p><b>R5.4</b></p> <p>Delete Policies NSR1-6. Include a Policy for Norwich as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p><b>Norwich</b></p> <p>Norwich will be a regional focus for development for housing, employment, retail, leisure, cultural and educational purposes. Particular development aims will be to:</p> <ul style="list-style-type: none"> <li>- provide for 33,000 net additional dwellings in the Norwich Policy Area (NPA) in the period 2001-2021 facilitated by joint or coordinated LDDs prepared by Norwich, South Norfolk and Broadland;</li> <li>- achieve a major shift in emphasis across the NPA towards travel by public transport;</li> <li>- support and enhance the image of Norwich as a “contemporary medieval city”; and</li> <li>- promote the city as a destination for tourists and visitors and a gateway to the wider rural and coastal areas of the county and to The Broads.</li> </ul> <p>Planning for employment growth in the NPA will focus on:</p> <ul style="list-style-type: none"> <li>- the City Centre (particularly media and creative industries, finance and insurance, and information communication technologies)</li> <li>- Thorpe St Andrew and Longwater, Costessy (business park use);</li> </ul>

Location / Para Number	Recommendation								
<p>Para 5.46</p>	<ul style="list-style-type: none"> <li>- Colney/Cringlieford (significant expansion of the research park reserved for research and development, higher education, and hospital/health related uses);</li> <li>- Norwich Airport (uses benefiting from an airport-related location); and</li> <li>- Wymondham/A11 corridor (high-tech development and rail-related uses).</li> </ul> <p>Formal local delivery arrangements will be adopted to plan and deliver these aims. The extent of the Norwich Policy Area, based on that of the previous Structure Plan, should be established in LDDs.</p> <p><b>Note: Policy H1</b> whole District allocations are:</p> <table border="0" style="margin-left: 20px;"> <tr> <td>Broadland</td> <td style="text-align: right;">12,200</td> </tr> <tr> <td>Norwich</td> <td style="text-align: right;">14,100</td> </tr> <tr> <td>North Norfolk</td> <td style="text-align: right;">8,000</td> </tr> <tr> <td>South Norfolk</td> <td style="text-align: right;">11,200</td> </tr> </table> <p><b>RS.5</b> Delete Policies GYL1 to GYL4. Include a Policy for Great Yarmouth and Lowestoft as Key Centres for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p><b>Great Yarmouth and Lowestoft</b></p> <p>The strategy for Great Yarmouth and Lowestoft is to promote the comprehensive regeneration of the two towns, capitalising on their unique attributes and protecting and enhancing their environmental assets. Local development documents and other strategies will pursue this strategy by:</p> <p>Promoting radical change in the economy by building on the area's established sectors and key attributes including:</p> <ul style="list-style-type: none"> <li>- the renewable energy cluster (utilising existing offshore engineering skills);</li> <li>- a more diverse tourism cluster, based on the resort and leisure role of the towns and the Sub-Region's coastal environment, wildlife areas and proximity to the Broads;</li> <li>- environmental technologies and the wider environmental economy. This will be furthered by seeking to establish a research and teaching centre supported by further and higher educational institutions and others to underpin the environmental economy; and</li> </ul>	Broadland	12,200	Norwich	14,100	North Norfolk	8,000	South Norfolk	11,200
Broadland	12,200								
Norwich	14,100								
North Norfolk	8,000								
South Norfolk	11,200								

Location / Para Number	Recommendation				
	<ul style="list-style-type: none"> <li>- port and related activities to develop links with the rest of Europe.</li> </ul> <p>Encouraging an urban renaissance in core areas by identifying priority areas and projects for brownfield redevelopment in order to achieve economic, physical and social regeneration in inner urban areas and, in particular, taking advantage of key waterfront sites in both towns. Priority will be given to those regeneration projects that can assist in dealing with concentrations of deprivation within the towns.</p> <p>Delivering additional housing in line with the provision set out in Policy H1 to support a healthy housing market, assist the regeneration of brownfield sites and meet local affordable housing needs.</p> <p>Promoting transport improvements on key links into the area, between the towns and within them, with the following key priorities:</p> <ul style="list-style-type: none"> <li>- enhanced public transport on strategic links into the towns;</li> <li>- improved access by road into the towns from Norwich;</li> <li>- measures to relieve congestion and improve access to regeneration opportunities within the urban areas of Yarmouth and Lowestoft; and</li> <li>- management and other local measures to improve the conditions for public transport, walking and cycling within the urban areas.</li> </ul> <p><b>Note: Policy H1</b> whole District allocations are:</p>				
Para 5.50	<table border="0"> <tr> <td>Great Yarmouth</td> <td>6,000</td> </tr> <tr> <td>Waveney</td> <td>5,800</td> </tr> </table> <p><b>R5.6</b></p> <p>Delete Policy NSB1 in favour of appropriate policy coverage in Policy ENV1 (<b>R9.1</b>)</p>	Great Yarmouth	6,000	Waveney	5,800
Great Yarmouth	6,000				
Waveney	5,800				
Paras 5.51-5.54	<p><b>R5.7</b> Delete Policy TH1. Include a Policy for Thetford as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p><b>Thetford</b></p>				

Location / Para Number	Recommendation
<p>Para 5.58</p>	<p>Thetford will develop as a Key Centre for Development and Change (although on a smaller scale than some of the other Key Centres) building on its role as an employment and service centre, its links to Norwich, Cambridge, Bury St Edmunds and London, and its position as an important gateway to The Brecks. The principal aims to be furthered through the preparation of LDDs will be:</p> <ul style="list-style-type: none"> <li>- to increase the number of dwellings in and on the edge of the town by at least 6,000 between 2001 and 2021 through (a) maximising sensitive development within the urban area which respects its historic settings and features and (b) the creation of sustainable urban extensions;</li> <li>- to facilitate growth of a diversified employment base which will maintain the town’s economic self-containment and reflect its role as a key settlement in the A11 corridor;</li> <li>- to achieve renaissance of the town centre, securing major improvements in the range and quality of its facilities and townscape while protecting and improving its historic attributes and natural setting; and</li> <li>- to provide maximum opportunity for travel by non-car modes within the town and to neighbouring Key Centres and market towns.</li> </ul> <p><b>Note: Policy H1</b> whole District allocation is:</p> <p>Breckland 15,200</p> <p><b>R5.8</b> Delete Policies GPSR1 to GPSR4. Include a Policy for Peterborough as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p><b>Strategy for Peterborough</b></p> <p>Within Peterborough, the strategy is for growth and regeneration to strengthen Peterborough’s role as a major regional centre and focus of the northern part of the London-Stansted-Cambridge-Peterborough Growth Area. Policies will seek to achieve an increase of at least 20,000 additional jobs in the period 2001-2021 together with strong housing growth, sustainable transport improvements and provision of social, community and green infrastructure. These policies will include:</p> <ul style="list-style-type: none"> <li>- within the City of Peterborough, development and regeneration of the city centre to create an improved range of services and facilities including retailing, housing, leisure, cultural and green infrastructure provision, and the regeneration of inner urban areas;</li> <li>- delivery of a significant and sustained increase in housing to implement the provision in Policy H1 of 25,000 additional</li> </ul>

Location / Para Number	Recommendation
<p>Paras 5.62 &amp; 5.70</p>	<p>dwelling for Peterborough UA between 2001 and 2021;</p> <ul style="list-style-type: none"> <li>- seeking to attract investment in sectors of the economy that have particular scope for expansion such as further development of knowledge based sectors, public administration, retail and leisure services and environmental clusters;</li> <li>- improving access to locally based further and higher education facilities through a strategy to establish and expand the provision of higher education and work towards the provision of a university;</li> <li>- achieving within Peterborough city an increase in the use of public transport, walking and cycling and a reduction in car use; and</li> <li>- improving transport choice between Peterborough and the rural areas.</li> </ul> <p><b>Note: Policy H1</b> to show a net dwelling increase of 25,000 for Peterborough UA and 11,000 for Fenland District.</p> <p>The supporting text, based on a much reduced version of draft Plan paragraphs 5.88 to 5.103, should contain the following key points:</p> <ul style="list-style-type: none"> <li>- a reference to the Peterborough Sub-Region’s influence and linkages across regional boundaries with the East Midlands and the Milton Keynes South Midlands Growth Area. Co-operation is required across regional boundaries to ensure compatibility of policies in LDDs and co-ordinated monitoring;</li> <li>- reference to the importance of the new City Centre Framework for Peterborough and the role of the Urban Regeneration Company; and</li> <li>- reference to the need for LDDs to pay specific regard to Strategic Flood Risk Assessments for Peterborough and Fenland.</li> </ul> <p><b>R5.9</b> Delete Policies CSR1-CSR5 and replace with the following:</p> <p><b>New Policy CSR1: Strategy for the sub-region</b></p> <p>The vision for the Cambridge Sub-Region during the period to 2021 and beyond is that it will continue to develop as a centre of excellence and world leader in the fields of higher education and research, and will foster dynamism, prosperity and further expansion of the knowledge-based economy spreading outwards from Cambridge. At the same time the historic character and setting of Cambridge as a compact city will be protected and enhanced, together with the character and setting of the market</p>

Location / Para Number	Recommendation
	<p>towns and other settlements and the important environmental qualities of the surrounding area.</p> <p>A comprehensive approach will be adopted to secure the necessary infrastructure provision (including green infrastructure) to support the development strategy for the sub-region.</p> <p>LDDs will make provision for development in the sub-region focused on making the most of the development potential of land:</p> <ul style="list-style-type: none"> <li>- in the built-up area of Cambridge, subject to considerations of environmental capacity;</li> <li>- on the periphery of the built-up area of Cambridge, on land released from the Green Belt following the Structure Plan (2003) and through the Cambridge Local Plan and LDDs prepared by the local planning authorities;</li> <li>- at the new settlement of Northstowe, linked to the guided busway; and</li> <li>- on land within or on the peripheries of the Cambridgeshire market towns and within key service centres (or on the peripheries of key service centres, mainly limited to existing commitments), where such development would contribute to the social and economic needs of the community and good public transport exists or can be provided.</li> </ul> <p><b>New Policy CSR2: Employment-generating development</b></p> <p>Employment land in and close to Cambridge (within boundaries to be defined in local plans/local development documents) will be reserved for development which can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success of the sub-region as a centre of high technology and research. Employment-related development proposals must demonstrate that they fall into one or more of the following categories:</p> <ol style="list-style-type: none"> <li>a) high technology and related industries and services concerned primarily with research and development including development of D1 educational uses and associated sui generis research institutes, which can show a special need to be located close to the Universities or other established research facilities or associated services in the Cambridge area;</li> <li>b) other small-scale industries which would contribute to a greater range of local employment opportunities, especially where this takes advantage of, or contributes to the development of, particular locally based skills and expertise; and</li> <li>d) the provision of office or other development providing an essential service for Cambridge as a local or Sub-Regional centre. Specific provision will be made throughout the sub-region for the development and expansion of high-technology clusters.</li> </ol> <p>In the market towns LDDs and other implementation programmes will identify land for employment development where this will</p>



Location / Para Number	Recommendation								
<p>Paras 5.97, 5.102 &amp; 5.108</p>	<p>improve the local balance of jobs and homes and diversify and improve the economies of the towns.</p> <p><b>New Policy CSR3: Green Belt</b></p> <p>In making provision for housing, employment and all other development a green belt will be maintained around Cambridge to define the extent of urban growth in accordance with the particular purposes of the Cambridge Green Belt which are to:</p> <ul style="list-style-type: none"> <li>- preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;</li> <li>- maintain and enhance the quality of its setting; and</li> <li>- prevent communities in the environs of Cambridge from merging into one another and with the city.</li> </ul> <p><b>New Policy CSR4: Transport infrastructure</b></p> <p>The objectives of the Regional Transport Strategy will be progressed by strengthening the public transport system and connections within the Cambridge Sub-Region, including possible extension of the guided busway system and by implementing, monitoring, and subsequently acting appropriately upon the planned experimental demand management measures.</p> <p><b>Note: Policy H1</b> allocations within the Cambridgeshire Sub-Region are:</p> <table border="0"> <tr> <td>Cambridge</td> <td>19,000</td> </tr> <tr> <td>East Cambs</td> <td>8,600</td> </tr> <tr> <td>Hunts</td> <td>11,200</td> </tr> <tr> <td>South Cambs</td> <td>23,500</td> </tr> </table> <p>Supporting text:</p> <p>Changes to be made to reflect the above and refer to (a) the role of Cambridgeshire Horizons and (b) an indicative list of types of cluster development. Include a definition of the Cambridge Sub-Region.</p> <p><b>R5.10</b> Delete Policies ST1 to ST7. Include a policy for Harlow as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p><b>Harlow</b></p> <p>The strategy for Harlow as a Key Centre for Development and Change is:</p> <p>(1) To promote the renaissance of the New Town through developing its role as a regional housing growth point, Regional</p>	Cambridge	19,000	East Cambs	8,600	Hunts	11,200	South Cambs	23,500
Cambridge	19,000								
East Cambs	8,600								
Hunts	11,200								
South Cambs	23,500								

Location / Para Number	Recommendation
	<p>Retail Centre and Strategic Employment Location. Regeneration, redevelopment and new urban development will be combined with transport measures and enhancement and conservation of green infrastructure to fulfil this strategy.</p> <p>(2) LDDs will provide for a total of 13,500 additional dwellings between 2001 and 2021, including some development outside the administrative boundary of Harlow district. Significant additional housing will be provided:</p> <ul style="list-style-type: none"> <li>- within the existing area of the town through selective renewal and redevelopment, including mixed use development in the town centre;</li> <li>- through urban extensions to the east to make optimum use of land between the existing built up area and the M11 motorway;</li> <li>- through smaller scale urban extensions to the south, south west and west; and</li> <li>- development will provide for a full range of housing types, sizes, tenures and costs and support development of a skilled and more inclusive local labour force.</li> </ul> <p>(3) The Green Belt will be reviewed to accommodate the new urban extensions. New Green Belt boundaries will be drawn so as to maintain the purposes of the Green Belt, specifically to maintain the integrity of the principles of the Gibberd Plan and landscape setting of Harlow and the physical and visual separation of the town from smaller settlements to the west.</p> <p>(4) LDDs will provide for the creation and maintenance of a network of multi-function greenspaces within and around the town, taking forward the principles of the Green Infrastructure Plan for Harlow. This network should:</p> <ul style="list-style-type: none"> <li>- maintain the principle of “green wedges” penetrating the urban fabric of the town;</li> <li>- provide for enhanced recreational facilities;</li> <li>- protect and maintain designated wildlife sites and provide for urban biodiversity; and</li> <li>- contribute to a visually enhanced character and setting to the town.</li> </ul> <p>(5) The town centre and employment areas will be developed to:</p> <ul style="list-style-type: none"> <li>- enhance the role of Harlow as a key centre for higher education and research based institutions;</li> <li>- provide for growth of Harlow’s established sectors and clusters;</li> <li>- attract employment related to the growth of Stansted Airport which does not need to be located there; and</li> </ul>

Location / Para Number	Recommendation								
<p>Paras 5.118 &amp; 5.119</p>	<ul style="list-style-type: none"> <li>- assist the growth of small and medium sized enterprises and the attraction of new economic development and innovation.</li> </ul> <p>(6) The transport priorities for Harlow are:</p> <ul style="list-style-type: none"> <li>- achieving a major increase in the use of public transport, walking and cycling within Harlow; new development at the eastern, southern and western edges of Harlow to be used to facilitate improvements for these modes through the town and to the town centre, employment areas and schools;</li> <li>- resolving traffic congestion for movement within and across the town without encouraging an increase in car use, particularly in peak hours;</li> <li>- improvements in accessibility by public transport from Harlow to London, Stansted and Cambridge, including priority for capacity and service improvements on the West Anglia main line; and</li> <li>- improved access from key employment sites to the strategic highway network, including consideration of an east-west bypass in the medium to longer term.</li> </ul> <p>(7) The strategy for Harlow should be delivered through a partnership approach based on the Area Regeneration Partnership. Harlow DC and Epping Forest DC should prepare a joint LDD to establish the planning framework for new urban extensions and the Green Belt reviews. The aim will be to bring forward development simultaneously at various locations so as to facilitate a significant increase in housing delivery at an early stage.</p> <p><b>Note: Policy H1</b> District allocations are:</p> <table border="0" style="margin-left: 20px;"> <tr> <td>Harlow</td> <td>13,500</td> </tr> <tr> <td>East Herts</td> <td>12,000</td> </tr> <tr> <td>Uttlesford</td> <td>8,000</td> </tr> <tr> <td>Braintree</td> <td>7,700</td> </tr> </table> <p>The supporting text should refer to the possibility of seeking a stronger delivery mechanism should the ARP not produce the looked for results.</p> <p><b>RS.11</b> Delete Policy SV1. Include a Policy for Stevenage as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p>The strategy is to deliver a new vision for Stevenage as a regional employment and housing growth point twinned with transformational physical, social and economic regeneration of the original new town to create a self-contained, sustainable and</p>	Harlow	13,500	East Herts	12,000	Uttlesford	8,000	Braintree	7,700
Harlow	13,500								
East Herts	12,000								
Uttlesford	8,000								
Braintree	7,700								

Location / Para Number	Recommendation				
	<p>balanced community.</p> <p>The main elements of this vision are:</p> <ol style="list-style-type: none"> <li>(1) overall housing growth of 14,400 dwellings within and on the edge of the built-up area of Stevenage by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the town but sustainable urban extensions will also be required to the west and north of the built-up area. This provision will include at least 5,000 dwellings at Stevenage West. Identification of land for the urban extensions will require preparation of a joint LDD with North Hertfordshire DC, including strategic review of the Green Belt. That review should establish new defensible long term boundaries which allow scope for continued growth of the Stevenage built up area beyond 2021. The Green Belt review should provide for extension of the Green Belt to cover those parts of the corridor between Luton to the west and Stevenage/Hitchin to the east not otherwise identified as land required to serve the respective long-term growth requirements of the Luton and Stevenage growth points;</li> <li>(2) provision for strategic employment growth over the period to 2021 by improving the competitive position of Stevenage and capitalising on its position between London and Cambridge. Measures to achieve this will include retaining and developing existing advanced technology clusters, creating new high quality sites capable of attracting biotech and R&amp;D activities, remodelling the town’s more outworn employment areas to meet a range of modern requirements, encouraging new enterprise, and promoting a regenerated, expanded and more vital town centre;</li> <li>(3) raised expectations and opportunities and better provision for local residents in terms of health, education, working aspirations and quality of life;</li> <li>(4) improved strategic transport infrastructure including creating the conditions for significant increased potential for public transport usage within the town and improvements in capacity to the East Coast Main Line, the A1(M) and the A505; and</li> <li>(5) substantial improvement to the image and quality of the town’s built fabric and public realm, including multi-functional green space.</li> </ol> <p><b>Note: Policy H1</b> whole District allocations are:</p> <table border="1" data-bbox="1268 1176 1364 1825"> <tr> <td>Stevenage</td> <td>14,400*</td> </tr> <tr> <td>North Herts</td> <td>7,800</td> </tr> </table> <p>* The Stevenage figure includes provision for up to 8,000 outside the Borough boundary in North Herts. The allowance of 6,400</p>	Stevenage	14,400*	North Herts	7,800
Stevenage	14,400*				
North Herts	7,800				

Location / Para Number	Recommendation
<p>Paras 5.121, 5.128, 5.132, 5.133, 5.139 &amp; 5.146</p>	<p>for development within the Borough should be regarded as a definite minimum which the LDF may plan to exceed.</p> <p><b>R5.12</b> Delete Policy LA1 and replace with the following:</p> <p><b>New Policy LA1: Strategy for the sub-region</b></p> <p>(1) The London Arc Sub-Region comprises those Districts most closely fringing Greater London - the South Hertfordshire Districts of Three Rivers, Dacorum, Watford, Hertsmere, St Albans, Welwyn Hatfield and Broxbourne, together with the Essex Districts of Epping Forest and Brentwood. Within this area the emphasis will be on:-</p> <ul style="list-style-type: none"> <li>- retention of long-standing green belt restraint, supported by more positive “green” use of neglected areas in accordance with green belt purposes; and</li> <li>- urban regeneration, including the promotion of greater sustainability within the built-up areas, particularly measures to increase the use of non-car modes of transport.</li> </ul> <p>(2) Exceptions to this approach are made at Hemel Hempstead and at Welwyn Garden City and Hatfield where strategic Green Belt reviews will be undertaken to permit these new towns to develop further as expanded Key Centres for Development and Change (as further provided for in the specific policies for these towns).</p> <p>(3) Other towns in the sub-region will retain and develop their existing individual roles within its polycentric structure, recognising and making as much provision for new development within the built-up area as is compatible with retention (and wherever possible enhancement) of their own distinctive characters and identities.</p> <p>(4) Across the London Arc the Essex and Hertfordshire Authorities will need to work with those in Greater London (especially Outer London) and to the north to ensure:</p> <ul style="list-style-type: none"> <li>- that opportunities presented by the existing and developing public transport radial routes are exploited to the maximum extent possible to secure mutually-supporting poles of sustainable development at nodal points along these routes; and</li> <li>- that (since London Arc is critical in this respect) a network-wide approach is adopted towards increasing opportunities for inter-urban journeys by public transport, coupled with demand management measures to meet the targets for traffic restraint set out in Policy T3/R8.1.</li> </ul> <p><b>New Policy LA2: Key Centre for Development and Change: Hemel Hempstead</b></p> <p>The vision for Hemel Hempstead couples growth in housing and employment with transformational physical, social and economic</p>

Location / Para Number	Recommendation
	<p>regeneration of the original new town to create an expanded sustainable and balanced community. The main elements of this vision are:</p> <p>(1) Overall housing growth of 12,000 within and on the edge of the built-up area of Hemel Hempstead by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the town but sustainable urban extensions will also be required. Identification of the urban extensions will require preparation of a joint LDD(s) with St Albans DC, including strategic review of the Green Belt to allow scope for continued growth of Hemel Hempstead in the longer term.</p> <p>(2) Provision for substantial employment growth over the period to 2021 by:-</p> <ul style="list-style-type: none"> <li>- capitalising on strategic links to Watford, proposed major development at Brent Cross/Cricklewood, Central London and other growth points at Luton and Milton Keynes;</li> <li>- regenerating the Maylands Industrial Estate; and</li> <li>- reviving confidence post-Buncefield; and creating a more attractive and vital town centre.</li> </ul> <p>(3) Focused and coordinated action by the LDV and the other responsible agencies to raise opportunities and expectations and make better provision for local residents in terms of health, education, employment and quality of life.</p> <p>(4) Improved strategic infrastructure including creating the conditions for significant increased potential for public transport usage within the town, particularly within areas of new development.</p> <p>(5) Substantial improvement to the image and quality of the town’s built fabric and public realm, including multi-functional green space.</p> <p><b>New Policy LA3: Key Centre for Development and Change: Welwyn Garden City and Hatfield</b></p> <p>Welwyn Garden City and Hatfield will jointly be key regional centres for development and change within the London Arc. The main elements of this vision are:</p> <p>(1) Overall housing growth of 10,000 within and on the edge of the built-up areas of the towns by 2021. A programme will be adopted for maximising opportunities for brownfield development and redevelopment within the towns but sustainable urban extensions will also be required, to be planned through the LDF process.</p> <p>(2) Provision for substantial employment growth over the period to 2021 by:-</p>

Location / Para Number	Recommendation
<p>Para 5.149</p>	<ul style="list-style-type: none"> <li>- capitalising on strategic links to Stevenage and Central London;</li> <li>- developing new employment sites and updating existing ones;</li> <li>- making the most of opportunities associated with the University of Hertfordshire and the new health campus;</li> <li>- reinforcing the town centre of Welwyn Garden City; and</li> <li>- creating a more vital Hatfield town centre.</li> </ul> <p>(3) Focused and coordinated action by the responsible agencies to raise opportunities and expectations and make better provision for local residents in terms of health, education, employment and quality of life.</p> <p>(4) Improved strategic infrastructure, including improvements to the capacity of the A1(M) and the East Coast Main Line and creating the conditions for significant increased potential for public transport usage within the town, particularly within areas of new development.</p> <p>(5) Retention/reinforcement of the best qualities of Welwyn Garden City and substantial improvements to the image and quality of the two towns’ built fabric and public realm, including provision of multi-functional green space and possibly a country park between Hatfield and St Albans.</p> <p><b>R5.13</b></p> <p>Include a Policy for Chelmsford as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p>The strategy for Chelmsford will:</p> <ul style="list-style-type: none"> <li>- provide for substantial growth of housing within an allocation of 16,000 for the District as a whole;</li> <li>- seek to strengthen the town’s role as a county town and further increase and diversify its employment base; and</li> <li>- aim to maximise the re-use of previously developed land but also provide for urban extensions in locations best able to assist the development of more sustainable transport systems within the town and capitalise on and improve its links to London and other regional centres.</li> </ul> <p>Supporting text: Include a sentence as follows:</p> <p>“Strategic review of the Green Belt is not ruled out as an option if the LDD were to find this the most sustainable way of meeting the growth allocation.”</p>

Location / Para Number	Recommendation																																										
	<p><b>Note: Policy H1</b> allocations within the London Arc Sub-Region are:</p> <table border="0"> <tr> <td>Broxbourne</td> <td>5,600</td> <td rowspan="2">including any Hemel Hempstead related development in St Albans</td> </tr> <tr> <td>Dacorum</td> <td>12,000</td> </tr> <tr> <td>Hertsmere</td> <td>5,000</td> <td rowspan="2">excluding any Hemel Hempstead related expansion in St Albans</td> </tr> <tr> <td>St Albans</td> <td>7,200</td> </tr> <tr> <td>Three Rivers</td> <td>4,000</td> <td></td> </tr> <tr> <td>Watford</td> <td>5,200</td> <td></td> </tr> <tr> <td>Welwyn Hatfield</td> <td>10,000</td> <td></td> </tr> <tr> <td>Brentwood</td> <td>3,500</td> <td></td> </tr> <tr> <td>Epping Forest</td> <td>3,500</td> <td>excluding any Harlow related development in Epping Forest</td> </tr> <tr> <td></td> <td>[London Arc Total</td> <td>55,800]</td> </tr> <tr> <td></td> <td>Chelmsford</td> <td>16,000</td> </tr> <tr> <td></td> <td>Maldon</td> <td>2,400</td> </tr> </table> <p><b>R5.14 Bedfordshire and Luton</b> Delete Policies BL1 and BL2.</p> <p><b>Note: Policy H1</b> whole District allocations are:</p> <table border="0"> <tr> <td>MKSM Growth Area locations:</td> <td>45,800</td> </tr> <tr> <td>Bedford Borough*</td> <td>1,300</td> </tr> <tr> <td>Mid Beds*</td> <td>11,000</td> </tr> <tr> <td>South Beds*</td> <td>1,000</td> </tr> </table> <p>* Outside MKSM Growth Area locations</p>	Broxbourne	5,600	including any Hemel Hempstead related development in St Albans	Dacorum	12,000	Hertsmere	5,000	excluding any Hemel Hempstead related expansion in St Albans	St Albans	7,200	Three Rivers	4,000		Watford	5,200		Welwyn Hatfield	10,000		Brentwood	3,500		Epping Forest	3,500	excluding any Harlow related development in Epping Forest		[London Arc Total	55,800]		Chelmsford	16,000		Maldon	2,400	MKSM Growth Area locations:	45,800	Bedford Borough*	1,300	Mid Beds*	11,000	South Beds*	1,000
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Para 5.163	<p><b>R5.15</b> Delete Policy BSE1. Include a Policy for Bury St Edmunds as a Key Centre for Development and Change in the</p>																																										



Location / Para Number	Recommendation								
<p>Para 5.170</p>	<p>sub-regional chapter of the RSS as follows:</p> <p>At Bury St Edmunds provision will be made for further employment, service and housing development that reflects its role as a service centre and its position on the road and rail corridors between Cambridge and Ipswich. The scale of employment growth will seek to minimise the volume of long distance out-commuting from the town. Priority will be given to the development of vacant and underused land in a manner that respects and enhances the historic town centre. In the longer term the scope for additional growth beyond 2016 will be considered at the first review of this Plan in the context of the resolution of infrastructure issues, particularly the capacity of the A14 and its junctions. Both development and transport strategies will promote a shift to non-car modes of travel.</p> <p><b>Note: Policy H1</b> whole District allocations are:</p> <table border="0"> <tr> <td>Forest Heath</td> <td>6,400</td> </tr> <tr> <td>Mid Suffolk</td> <td>7,500 (+ approx 800 on the edge of Ipswich)</td> </tr> <tr> <td>St Edmundsbury</td> <td>10,000</td> </tr> </table> <p><b>R5.16</b> Delete Policies KL1-KL4. Include a Policy for King’s Lynn as a Key Centre for Development and Change in the sub-regional chapter of the RSS as follows:</p> <p>At King’s Lynn LDDs will make further provision for housing, employment and other growth in the town in order to further the aims of achieving an urban renaissance and raising the town’s population to 50,000. The LDDs will develop policies to:</p> <ul style="list-style-type: none"> <li>- enhance the quality of the urban environment;</li> <li>- make better use of previously-developed land;</li> <li>- provide for an improved range of services in the town;</li> <li>- support the regeneration of communities; and</li> <li>- provide improved transport choices both within the urban area and between the town and the areas looking to it.</li> </ul> <p><b>Note: Policy H1</b> whole District allocation is:</p> <table border="0"> <tr> <td>King’s Lynn and West Norfolk</td> <td>12,000</td> </tr> </table>	Forest Heath	6,400	Mid Suffolk	7,500 (+ approx 800 on the edge of Ipswich)	St Edmundsbury	10,000	King’s Lynn and West Norfolk	12,000
Forest Heath	6,400								
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Location / Para Number	Recommendation
<b>Chapter 6</b>	
Para 6.1	<b>R6.1</b> Policy E1 Delete
Para 6.16	<b>R6.2</b> Policy E2 Change as follows: <b>Policy E2: Jobs Growth 2001-2021</b>
<p>The following indicative targets for net growth in jobs for the period 2001-2021 are adopted as reference values for monitoring purposes and as guidance for regional and local authorities, EEDA and other delivery agencies in all their policy and decision making on employment matters.</p>	
<b>District groupings</b>	
<u>Beds &amp; Luton</u>	
Bedford/Mid Beds	
Luton/South Beds	
<b>Total</b>	
<b>Recommendation</b>	
27,000	
23,000	
<b>50,000</b>	
<u>Cambridgeshire and Peterborough</u>	
Cambridgeshire	
[Cambridge/South Cambs/East Cambs/	
Huntingdon/Fenland]	
Peterborough UA	
<b>Total</b>	
75,000	
20,000	
<b>95,000</b>	
<u>Essex &amp; Unitaries</u>	
Essex Thames Gateway	
[Thurrock/Basildon/Castle Point/	
Southend-on-Sea]	
Haven Gateway - Essex	
52,000	

Location / Para Number	Recommendation
	<p>[Colchester/Tendring] 20,000</p> <p>London Arc - Essex</p> <p>[Epping Forest/Brentwood] 12,000</p> <p>Rest of Essex</p> <p>[Harlow/Uttlesford/Chelmsford/Braintree/Maldon/Rochford] 25,000</p> <p><b>Total</b> <b>109,000</b></p> <p><u>Hertfordshire</u></p> <p>London Arc - Hertfordshire</p> <p>[Three Rivers/Watford/Hertsmere/Broxbourne/Dacorum/St Albans Welwyn Hatfield] 63,000</p> <p>Rest of Herts</p> <p>[North Herts/Stevenage/E Herts] 14,000</p> <p><b>Total</b> <b>77,000</b></p> <p><u>Norfolk</u></p> <p>Kings Lynn &amp; W Norfolk 5,000</p> <p>Great Yarmouth 5,000</p> <p>Breckland 6,000</p> <p>North Norfolk 4,000</p> <p>Greater Norwich</p> <p>[Norwich/Broadland/S Norfolk] 36,000</p> <p><b>Total</b> <b>56,000</b></p> <p><u>Suffolk</u></p> <p>Haven Gateway-Suffolk</p> <p>[Ipswich/Suffolk Coastal/</p>

Location / Para Number	Recommendation										
	<table border="0"> <tr> <td data-bbox="295 1825 526 2101">Babergh]</td> <td data-bbox="295 94 526 1825">30,000</td> </tr> <tr> <td data-bbox="526 1825 574 2101">Waveney</td> <td data-bbox="526 94 574 1825">5,000</td> </tr> <tr> <td data-bbox="574 1825 670 2101">Rest of Suffolk [Mid Suffolk/St Edmundsbury/ Forest Heath]</td> <td data-bbox="574 94 670 1825">18,000</td> </tr> <tr> <td data-bbox="670 1825 694 2101"><b>Total</b></td> <td data-bbox="670 94 694 1825"><b>53,000</b></td> </tr> <tr> <td data-bbox="694 1825 718 2101"><b>OVERALL REGIONAL TOTAL</b></td> <td data-bbox="694 94 718 1825"><b>440,000</b></td> </tr> </table>	Babergh]	30,000	Waveney	5,000	Rest of Suffolk [Mid Suffolk/St Edmundsbury/ Forest Heath]	18,000	<b>Total</b>	<b>53,000</b>	<b>OVERALL REGIONAL TOTAL</b>	<b>440,000</b>
Babergh]	30,000										
Waveney	5,000										
Rest of Suffolk [Mid Suffolk/St Edmundsbury/ Forest Heath]	18,000										
<b>Total</b>	<b>53,000</b>										
<b>OVERALL REGIONAL TOTAL</b>	<b>440,000</b>										
Para 6.17	<p data-bbox="582 1176 614 1803"><b>R6.3</b> Policy E3 Change as follows:</p> <p data-bbox="638 1176 670 1803"><b>Policy E3: Provision of land for employment</b></p> <p data-bbox="694 116 869 1803">Local development documents will ensure that an adequate range of sites/premises (including dedicated land/sites and sites within mixed-use areas and town/district centres) is identified and then subsequently allocated, safeguarded and/or protected to meet the full range of sectoral requirements needing to be accommodated to meet the job growth targets of Policy E2 and the needs of the local economy as revealed by up-to-date employment land reviews. EERA will take a leading role in coordinating a consistent regional evidence base for, and approach to, future employment land reviews.</p> <p data-bbox="893 116 965 1803">Where development proposals and issues cross local authority boundaries this approach will be developed and applied across the whole urban or development area.</p> <p data-bbox="989 116 1061 1803">Sites of sufficient range, quantity and quality to cater for all relevant employment sectors will be provided at appropriate scales in urban areas, market towns and key rural centres. These will be at locations which:</p> <ul data-bbox="1085 116 1380 1803" style="list-style-type: none"> <li>- minimise commuting and promote more sustainable communities by achieving a closer local relationship between jobs and homes;</li> <li>- maximise potential use of public transport;</li> <li>- minimise loss of, or damage to, environmental and social capital, and where necessary substitute for any losses and secure positive enhancements. This will often mean giving precedence to the re-use of previously developed land and, wherever possible, the intensification of use on existing sites over the release of greenfield land;</li> <li>- meet the needs of the region’s significant clusters as set out in the Regional Economic Strategy; and</li> </ul>										

Location / Para Number	Recommendation
Para 6.20	<p>- provide appropriately for identified needs for skills-training and education purposes.</p> <p><b>R6.4</b> Policy E4 Change as follows:</p> <p><b>Policy E4: Regionally strategic employment locations</b></p> <p>Local development documents will identify readily-serviceable regionally strategic employment sites of the quality and quantity required to meet the needs of business as identified through the employment land reviews referred to in policy E3. Such sites will be provided particularly (but not exclusively) at the following regional strategic employment locations:</p> <ul style="list-style-type: none"> <li>- Harlow, Stevenage, Hemel Hempstead and Luton – to assist regeneration needs, ensure growth in key sectors and clusters, and ensure a balance to housing growth;</li> <li>- Thames Gateway, linked to the strategies for the Key Centres of Development and Change at Basildon, Southend-on-Sea and Thurrock Urban Area;</li> <li>- Cambridge Sub-Region, to secure its full potential as a centre for world-class research and development;</li> <li>- Peterborough, to achieve regeneration, attract business activities and key sectors and clusters including environmental services;</li> <li>- Norwich, to support regeneration and the town’s role in bio technology;</li> <li>- Haven Gateway, to support growth and regeneration at Colchester and Ipswich and the latter’s role in ICT, and development associated with port expansion at Harwich and Felixstowe;</li> <li>- Great Yarmouth, to support development associated with port expansion;</li> <li>- Hertfordshire, at locations (other than those noted above) where this would support strong, continued growth of mature and emerging clusters and sectors, and at other locations supporting regeneration of the Lee Valley; and</li> <li>- other Key Centres of Development and Change identified in the Spatial Strategy, including Chelmsford, to meet needs as may be identified in local development documents.</li> </ul>
Para 6.21	<b>R6.5</b> Policy E5 Delete
Para 6.21	<b>R6.6</b> Policy E6 Delete
Para 6.21	<b>R6.7</b> Policy E7 Change as follows

Location / Para Number	Recommendation
<p>Para 6.21</p> <p>Para 6.23</p>	<p><b>Policy E7: Supporting cluster development</b></p> <p>Clusters are an important feature of regional economic growth and prosperity. Local development documents will support the sustainable and dynamic growth of inter-regional and intra-regional business clusters, especially the regionally significant clusters identified in the RES as follows:</p> <ul style="list-style-type: none"> <li>- a life-science super cluster spreading from London as far as the Norwich Research Park;</li> <li>- an energy cluster on the Norfolk/Suffolk coast;</li> <li>- an environmental technologies cluster stretching from Essex to Cambridgeshire with a focal point in Peterborough;</li> <li>- a motor sports cluster with a focal point at Hethel in Norfolk and linking to Cranfield;</li> <li>- a multimedia cluster from London through Hertfordshire to Norfolk; and</li> <li>- a strong ICT cluster in the Cambridge area.</li> </ul> <p>Local development documents will also support locally significant clusters defined by local economic partnerships in collaboration with local authorities and EEDA.</p> <p>Support for clusters will be demonstrated by:</p> <ul style="list-style-type: none"> <li>- ensuring the availability of a sufficient quantity, quality, and choice of sites including provision for incubator units, growth on space and larger facilities for established business clusters;</li> <li>- addressing accommodation needs immediately adjacent to or close to key institutions including higher education and university facilities; and</li> <li>- addressing the need for user restrictions to secure the use of premises for specific activities.</li> </ul> <p><b>R6.8</b> Policy E8 Delete</p> <p><b>R6.9</b> Policies E9 &amp; E10 Combine as follows:</p> <p><b>Policy Exx: Regional structure of town centres</b></p> <p>The cities and towns of regional strategic importance for retail and other town centre purposes are:</p> <ul style="list-style-type: none"> <li>- <u>Regional centres:</u> Norwich, Watford, Ipswich, Peterborough, Cambridge, Colchester, Chelmsford, Basildon, Southend;</li> </ul>

Location / Para Number	Recommendation
	<p>and</p> <ul style="list-style-type: none"> <li>- <u>Major town centres:</u> Hemel Hempstead, Stevenage, Bedford, Luton, Harlow, King’s Lynn, St Albans, Welwyn Garden City, Bury St Edmunds, Great Yarmouth, and Lowestoft.</li> </ul> <p>Major new retail development (and other main town centre complementary uses) will primarily be located in the centres identified above and will be consistent in scale with the size and character of the centre and its role in the regional structure. Local development documents will propose higher order provision only where need is clearly established and the development would:</p> <ul style="list-style-type: none"> <li>- result in a more sustainable pattern of development and movement, including a reduction in the need to travel;</li> <li>- have no significant harmful impact on other centres or the transport network; and</li> <li>- be within the limits of environmental capacity.</li> </ul> <p>Any new regional centres will be subject to similar considerations, and will be brought forward only as part of a review of this RSS.</p> <p>Below the level of the centres of regional strategic importance local development documents will identify a network of more <u>local town centres, district centres, neighbourhood centres and village centres.</u></p>
Para 6.27	<b>R6.10</b> Policy E11 Delete
Para 6.29	<b>R6.11</b> Policy E12 Change as follows: <b>Policy E12: Out-of-centre regional/sub-regional shopping centres</b>
	<p>No need has been identified for additional out-of-centre regional/sub-regional shopping centres, or for the extension of retailing at such centres during the plan period.</p> <p>Local development documents will define the future role of centres of this kind, in particular to determine whether they should remain purely retail centres or alternatively, develop into town centres with a full range of service provision. This course will only be adopted where this would improve social, environmental and economic sustainability and deliver improved sustainable transport accessibility, particularly improved public transport access.</p>
Para 6.30	<b>R6.12</b> Policy E13 Change as follows: <b>Policy E13: Tourism</b>

Location / Para Number	Recommendation
<p>Para 6.31</p>	<p>Local development documents will:</p> <ul style="list-style-type: none"> <li>- include policies to encourage realistic and sustainable investment in the maintenance, improvement, regeneration, extension and appropriate diversification of the region’s tourist industry, recognising that some tourism potential is based upon the presence of unique local features or assets, but that negative effects on the natural and built environment, local distinctiveness and host communities should be avoided or minimised; and</li> <li>- integrate with other plans and strategies for managing tourism, particularly local and regional tourism strategies and visitor management plans, especially those for regenerating seaside resorts and extending employment outside the normal tourist season.</li> </ul> <p><b>R6.13</b> Policy E14 Change as follows:</p> <p><b>Policy E14: The region’s airports</b></p> <p>The roles of Stansted and Luton Airports are outlined in the Air Transport White Paper. Future development at these airports (including timely provision of infrastructure, a surface access strategy in accordance with the objectives and policies of the RSS, and adequate environmental safeguards) will be planned in detail through airport master plans. These will need to be consistent with the sustainable development principles in Policy SS1 and other policies of this RSS. Individual phases of development will, where relevant, be subject to the process of Environmental Impact Assessment.</p> <p>At Stansted Airport development for operational and directly associated airport employment will be located at the Airport itself, and land within the airport’s boundaries will be safeguarded for that purpose only. Employment development not directly related to the airport’s operation will be located at Harlow and nearby towns identified in local development documents in accordance with the general RSS spatial strategy. Housing development related to employment growth at the Airport will be located at Harlow and nearby towns as provided in LDDs.</p> <p>Support is also given to the modest expansion of Norwich and Southend Airports to meet local market demand, subject to the same conditions as those outlined above. In addition, support is given to the relocation of Cambridge Airport operations to a suitable alternative location, subject to the same safeguards.</p>
<p>Chapter 7</p>	



**Location / Para Number**

Para 7.51

**Recommendation**

**R7.1** Replace polices S13 and H1 to H3 with the following:

**Policy H1: Regional Housing Provision**

In the East of England as a whole provision\* will be made for the completion of at least 505,500 additional dwellings over the period 2001 to 2021. The regional housing provision will be distributed as follows:

**Table 7.2**

Area/ District	H1 Panel	Panel H1 figures and 5 year indicative phases			
		2001-06	2006-11	2011-16	2016-21
MKSM	45,800	7,250 (1,450)	11,750(2,350)	13,250 (2,650)	13,550 (2,710)
Bedford BC	1,300	850 (170)	150 (30)	150 (30)	150 (30)
Mid Beds	11,000	2,850 (570)	2,700 (540)	2,700 (540)	2,700 (540)
South Beds	1,000	150 (30)	300 (60)	300 (60)	300 (60)
<b>Beds &amp; Luton</b>	<b>59,100</b>	<b>11,100 (2,200)</b>	<b>14,900 (2,980)</b>	<b>16,400 (3,280)</b>	<b>16,700 (3,340)</b>
Cambridge	19,000	3,050 (610)	5,300 (1,060)	5,300 (1,060)	5,300 (1,060)
East Cambs	8,600	2,800 (560)	1,950 (390)	1,950 (390)	1,950 (390)
Fenland	11,000	3,050 (610)	2,650 (530)	2,650 (530)	2,650 (530)
Huntingdonshire	11,200	2,600 (520)	2,850 (570)	2,850 (570)	2,850 (570)
South Cambs	23,500	4,600 (920)	6,300 (1,260)	6,300 (1,260)	6,300 (1,260)
Peterborough UA	25,000	4,650 (930)	6,800 (1,360)	6,800 (1,360)	6,800 (1,360)
<b>Cambs &amp; Peterborough</b>	<b>98,300</b>	<b>20,750 (4,150)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>	<b>25,850 (5,170)</b>
Basildon <sup>1</sup>	10,700	1,800 (360)	2,950 (590)	2,950 (590)	2,950 (590)
Braintree	7,700	2,800 (560)	1,650 (330)	1,650 (330)	1,650 (330)
Brentwood	3,500	1,000 (200)	850 (170)	850 (170)	850 (170)

Location / Para  
Number

## Recommendation

Castle Point	4,000	900 (180)	1,050 (210)	1,050 (210)	1,050 (210)
Chelmsford	16,000	3,950 (790)	4,050 (810)	4,050 (810)	4,050 (810)
Colchester	17,100	4,200 (840)	4,300 (860)	4,300 (860)	4,300 (860)
Epping Forest <sup>2</sup>	3,500	1,100 (220)	800 (160)	800 (160)	800 (160)
Harlow <sup>2</sup>	13,500	1,900 (380)	3,850 (770)	3,850 (770)	3,850 (770)
Maldon	2,400	650 (130)	600 (120)	600 (120)	600 (120)
Rochford	4,600	1,000 (200)	1,200 (240)	1,200 (240)	1,200 (240)
Tendring	8,500	2,000 (400)	2,150 (430)	2,150 (430)	2,150 (430)
Uttlesford	8,000	1,600 (320)	2,150 (430)	2,150 (430)	2,150 (430)
Southend	6,500	1,700 (340)	1,600 (320)	1,600 (320)	1,600 (320)
Thurrock <sup>3</sup>	18,500	4,250 (850)	4,750 (950)	4,750 (950)	4,750 (950)
<b>Essex + Unitaries</b>	<b>124,500</b>	<b>28,700 (5,740)</b>	<b>31,900 (6,380)</b>	<b>31,900 (6,380)</b>	<b>31,900 (6,380)</b>

## Panel H1 figures and 5 year indicative phases

## 5 year indicative phases (dwellings pa in brackets)

Area/ District	H1 Panel	2001-06	2006-11	2011-16	2016-21
Broxbourne	5,600	1,150 (230)	1,500 (300)	1,500 (300)	1,500 (300)
Dacorum <sup>4</sup>	12,000	2,650 (530)	3,100 (620)	3,100 (620)	3,100 (620)
East Herts	12,000	2,500 (500)	3,150 (630)	3,150 (630)	3,150 (630)
Hertsmere	5,000	1,100 (220)	1,300 (260)	1,300 (260)	1,300 (260)
North Herts <sup>5</sup>	7,800	2,550 (510)	1,750 (350)	1,750 (350)	1,750 (350)
St Albans <sup>4</sup>	7,200	1,650 (330)	1,850 (370)	1,850 (370)	1,850 (370)
Stevenage <sup>5</sup>	14,400	1,950 (390)	4,150 (830)	4,150 (830)	4,150 (830)
Three Rivers	4,000	1,100 (220)	950 (190)	950 (190)	950 (190)
Watford	5,200	1,000 (200)	1,400 (280)	1,400 (280)	1,400 (280)
Welwyn Hatfield	10,000	2,400 (480)	2,550 (510)	2,550 (510)	2,550 (510)
<b>Hertfordshire</b>	<b>83,200</b>	<b>18,050 (3,610)</b>	<b>21,700 (4,340)</b>	<b>21,700 (4,340)</b>	<b>21,700 (4,340)</b>
Breckland	15,200	3,250 (650)	4,000 (800)	4,000 (800)	4,000 (800)
Broadland <sup>6</sup>	12,200	2,550 (510)	3,200 (640)	3,200 (640)	3,200 (640)

Location / Para  
Number

## Recommendation

Great Yarmouth	6,000	1,050 (210)	1,650 (330)	1,650 (330)	1,650 (330)
King's Lynn & West Norfolk	12,000	2,400 (480)	3,200 (640)	3,200 (640)	3,200 (640)
North Norfolk	8,000	1,850 (370)	2,050 (410)	2,050 (410)	2,050 (410)
Norwich <sup>6</sup>	14,100	3,350 (670)	3,600 (720)	3,600 (720)	3,600 (720)
South Norfolk <sup>6</sup>	11,200	2,650 (530)	2,850 (570)	2,850 (570)	2,850 (570)
<b>Norfolk</b>	<b>78,700</b>	<b>17,050 (3,410)</b>	<b>20,550 (4,110)</b>	<b>20,550 (4,110)</b>	<b>20,550 (4,110)</b>
Babergh <sup>7</sup>	5,000	1,450 (290)	1,200 (240)	1,200 (240)	1,200 (240)
Forest Heath	6,400	1,000 (200)	1,800 (360)	1,800 (360)	1,800 (360)
Ipswich <sup>7</sup>	20,000	3,550 (710)	5,500 (1,100)	5,500 (1,100)	5,500 (1,100)
Mid Suffolk <sup>7</sup>	7,500	1,700 (340)	1,950 (390)	1,950 (390)	1,950 (390)
St Edmundsbury	10,000	2,450 (490)	2,550 (510)	2,550 (510)	2,550 (510)
Suffolk Coastal <sup>7</sup>	7,000	2,100 (420)	1,650 (330)	1,650 (330)	1,650 (330)
Waveney	5,800	1,850 (370)	1,300 (260)	1,300 (260)	1,300 (260)
<b>Suffolk</b>	<b>61,700</b>	<b>14,100 (2,820)</b>	<b>15,850 (3,170)</b>	<b>15,850 (3,170)</b>	<b>15,850 (3,170)</b>
<b>East of England</b>	<b>505,500</b>	<b>109,850 (21,970)</b>	<b>130,750 (26,150)</b>	<b>132,250 (26,450)</b>	<b>132,550 (26,510)</b>

- 1 Basildon: the figure for Basildon includes an indicative allowance for about 2,200 outside the Essex Thames Gateway Sub-Region.
- 2 Epping Forest and Harlow: the figure for Epping Forest excludes provision for about 3,000 dwellings at the edges of Harlow in the EFDC area, which is included within the total given for Harlow
- 3 Thurrock: the figure for Thurrock applies to that part of the District within the Essex Thames Gateway Sub-Region but does not imply the imposition of a moratorium on acceptable re-use of previously developed land within existing settlements outside the sub-region.
- 4 Dacorum and St Albans: the figure for St Albans excludes provision (the amount to be determined through the LDD process) for expansion of Hemel Hempstead on land within SADC area, which is included in the Dacorum total.
- 5 North Herts and Stevenage: the figure for North Herts excludes provision for up to 8,000 adjoining Stevenage and included in the Stevenage BC figure, and any provision adjoining Luton which may emerge from MKSM.
- 6 Broadland, Norwich, and South Norfolk: figures for Broadland and South Norfolk include provision related to Norwich as part of the NPA.
- 7 Babergh, Ipswich, Mid Suffolk and Suffolk Coastal: figures for Babergh, Mid Suffolk and Suffolk Coastal exclude provision on the edge of Ipswich as part of the Ipswich Policy Area (IPA). The Ipswich figure includes provision of at least 15,400 within Ipswich, as well as provision for the IPA

Location / Para Number	Recommendation
	<p>within Babergh (up to 600), Suffolk Coastal (up to 3,200) and Mid Suffolk (up to 800).</p> <p>Add in supporting text:</p> <p>* “Provision” in policy H1 is identified as land identified through the planning process. In order to assist completions at the rates set in the policy, sites forming part of the identified land bank should be genuinely capable of yielding the number of completions expected from them during the period (ie not subject to physical or other constraints likely to prejudice that contribution).</p> <p>It will assist the objective of early delivery of housing if the planning process identifies land capable of being developed to provide a variety of dwellings (by type and size). It will also assist if housebuyers/occupiers are able to choose from a range of different locations, although this should not be so wide as to compromise the aims of the RSS for a sustainable pattern of development within an objective of urban concentration. Where there is considerable reliance on a small number of locations it will be desirable if steps are taken to widen participation at that site by an appropriate number of housebuilders.</p> <p><b>Policy H2: Phasing of housing development</b></p> <p>The indicative annual rates shown in Policy H1 will be used for monitoring purposes. They should be taken into account by Local Planning Authorities in keeping under review the phasing of housing provision in local development documents. Any such phasing should also take account of the following guiding principles:</p> <ul style="list-style-type: none"> <li>- implementing the priorities of Spatial Strategy (Policies SS1 to SS9);</li> <li>- the outcome of up-to-date local housing needs assessments;</li> <li>- the need for co-ordination and consistency of approach between neighbouring authorities in delivering sub-regional objectives; and</li> <li>- where appropriate, co-ordination of development with necessary transport and other infrastructure provision.</li> </ul> <p><b>Policy H3: Affordable housing*</b></p> <p>Within the additional housing requirement in Policy H1, LDDs should set appropriate targets for affordable housing taking into account:</p> <ul style="list-style-type: none"> <li>- the objectives of the RSS;</li> <li>- local assessments of affordable housing need prepared in accordance with Government guidance; and</li> </ul>

Location / Para Number	Recommendation
	<p>- housing market considerations and the Regional Housing Strategy.</p> <p>At a regional level, delivery will be monitored against an overall regional expectation that some 35% of new housing coming forward as a result of planning permissions granted after the adoption of the RSS should be affordable.</p> <p>*For the purposes of this policy the definition of affordable housing is as in Annex A of draft PPS3.</p> <p><b>Policy H4: Provision for Gypsies and Travellers</b></p> <p>Local authorities should make provision for sites/pitches to meet the identified needs of Gypsies and Travellers living within or resorting to their area. EERA will work with local authorities and other stakeholders to bring forward an early review to this RSS setting out the strategic framework for such provision, and identifying the requirement in terms of pitch numbers at a district level. Until that review is in place provision in LDDs should be based on the latest available local information on need within the area.</p>
<b>Chapter 8</b>	
<p>Paras 8.6, 8.10, 8.12, 8.14, 8.16-8.25, 8.27-8.29 &amp; 8.36</p>	<p><b>R8.1</b> Recast and replace the RTS Policies T1 to T17 with the following revised set of policies. The new Policies cover the RTS objectives (Policy T1 <i>replacing draft Plan Policy T1</i> ), behavioural change and demand management (T2, and T3 <i>replacing T15</i>), broad spatial priorities for transport in the region (T4, T5, T6, T7 <i>in part replacing draft Plan Policies T2, T6, T7, T8, T9, T10, T11, T14 in part</i>), policies for management of local roads, walking and cycling (T8 and T9 <i>replacing draft Plan Policies T14 in part and T12</i>), movement of freight (T10 <i>replacing draft Plan Policy T3</i>) ports (T11 <i>replacing draft Plan Policy T4</i>), airports (T12 <i>replacing draft Plan Policy T5</i>), public transport accessibility and parking standards (T13, T14 <i>replacing draft plan Policies T13 and T16</i>), and the transport investment programme (T15 <i>replacing draft Plan Policy T17</i>).</p> <p><b>Policy T1: Regional Transport Strategy Objectives</b></p> <p>In implementing the overall vision and objectives of the Regional Spatial Strategy, transport policies will seek to meet the following primary regional objective:</p> <p>a) to contribute to a reduction in the region’s climate change emissions by reducing growth, and ultimately achieving an absolute reduction in traffic on the region’s road system.</p>

Location / Para Number	Recommendation
	<p>In addition the RTS has the following objectives:</p> <ul style="list-style-type: none"> <li>b) to increase the proportion of the region’s movement carried by public transport, walking and cycling;</li> <li>c) to provide access to areas of new development and regeneration;</li> <li>d) to provide safe, efficient and sustainable access between homes and workplaces, schools, town centres and other key destinations;</li> <li>e) to provide for efficient movement of passengers and freight through the region from the international gateways; and</li> <li>g) to reduce the transport intensity of economic activity.</li> </ul> <p><b>Policy T2: Changing travel in the East of England</b></p> <p>Government will work with EERA, EEDA, local authorities, transport providers and other organisations to implement a concerted programme of policies and measures aimed at bringing about a significant change in travel behaviour in the region and a shift towards greater use of sustainable forms of transport. In addition to implementing other policies of this RTS such measures will include:</p> <ul style="list-style-type: none"> <li>- awareness raising on the real costs of unsustainable travel, and the benefits and availability of alternatives;</li> <li>- fuller application of workplace, school and personal travel plans, not only for journeys to work but for business travel and transport operations;</li> <li>- educational programmes;</li> <li>- investment in business initiatives, including but not limited to tele-working and other means of decoupling economic activity from the need for travel; and</li> <li>- investigation of ways of providing incentives for more sustainable transport use.</li> </ul>
	<p><b>Policy: T3 Managing traffic demand</b></p> <p>Demand management measures for highway use will be pursued to effect a reduction in road traffic growth. Road user charging, in the form of urban congestion charging, selective or area wide charging on the strategic network will be considered as part of an integrated approach in support of the objectives of this RTS. In addition to being consistent with any national technical standards</p>

Location / Para Number	Recommendation
	<p>and guidelines, any road user charging scheme within the region should:</p> <ul style="list-style-type: none"> <li>- be matched with promotion of sustainable alternatives to vehicle use;</li> <li>- be designed so as to avoid disadvantaging the region’s rural communities and other regeneration areas dependent on road access; and</li> <li>- produce resources for investment to support the objectives of this RTS.</li> </ul> <p><b>Policy T4: Urban transport</b></p> <p>Within urban areas, particularly in the Key Centres for Development and Change identified in Policy SS4, LTPs, LDDs and other measures will seek to bring about a significant shift away from car use to greater use of public transport, walking and cycling. This will be achieved through any or all of the following types of measures, in combination as appropriate to the local circumstances:</p> <ul style="list-style-type: none"> <li>- ensuring that urban extensions and other major developments are linked from the outset into the existing urban structure through safe, well designed pedestrian and cycling routes and a high standard of modern public transport;</li> <li>- capitalising on opportunities provided by new development to achieve area wide improvements in public transport services, footpaths and cycle networks;</li> <li>- promotion of public transport use through quality partnerships and other measures to provide enhanced services, improved interchanges, access, visibility and travel information, and traffic management measures prioritising road-space for buses; and</li> <li>- improvements to local networks for walking and cycling including increasing the attractiveness and safety of the public realm.</li> </ul> <p><b>Policy T5: Inter urban public transport</b></p> <p>Improvements sought to inter-urban public transport will focus on the Regional Transport Nodes identified on the key diagram. These are:</p> <p>Basildon, Bedford, Cambridge, Chelmsford, Colchester, Harlow, King’s Lynn, Luton/Dunstable, Ipswich, Norwich, Peterborough, Stansted, Stevenage, Southend, Thurrock and Watford.</p>

Location / Paragraph Number	Recommendation
	<p>The priority will be to facilitate movement between major centres within the region, access to London and to national networks and, within the Regional Transport Nodes, interchange between modes and integration between strategic and local networks. Particular measures will include:</p> <ul style="list-style-type: none"> <li>- improved access, particularly by sustainable local transport, to main line railway stations;</li> <li>- support for investment to improve rail services to key centres and for improved comfort and capacity on crowded routes, in the light of priorities identified in the Regional Planning Assessment for the Railway and Route Utilisation Studies;</li> <li>- support for high quality interurban bus/ coach services, particularly on east-west links and in other situations where rail is not available, co-ordinated with rail and local public transport; and</li> <li>- strategic Park and Ride targeted at reducing car use for inter-urban travel.</li> </ul> <p><b>Policy T6: Strategic Road Network</b></p> <p>The strategic road network identified on the key diagram will be improved, managed and maintained in accordance with the following key priorities:</p> <ul style="list-style-type: none"> <li>- national priorities for maintaining the strategic function of the region’s Motorways and Trunk Roads so as to tackle congestion without inducing unnecessary additional traffic;</li> <li>- access to key centres within the region in support of economic development and regeneration objectives, particularly in Strategic Employment Locations and Priority Areas for Regeneration;</li> <li>- the efficient movement of freight which cannot be carried by rail or waterway so as to minimise its impact on the environment and local transport networks;</li> <li>- improving safety and efficiency of the network and reducing its environmental impact; and</li> <li>- complementing measures for managing traffic demand under Policy T3.</li> </ul> <p><b>Policy T7: Transport in rural areas</b></p> <p>In the rural areas priority will be given to providing sustainable access from villages and other rural settlements to market towns and key service centres (see Policy SS4). Measures will include:</p> <ul style="list-style-type: none"> <li>- support for public transport where viable to meet and, where possible, exceed the minimum accessibility levels set out in</li> </ul>



Location / Para Number	Recommendation
	<p>Policy T13 and Table 8.1;</p> <ul style="list-style-type: none"> <li>- innovative approaches to local transport provision including community based transport initiatives, travelling service delivery to remote areas and measures to assist people without the use of a vehicle; and</li> <li>- support for increasing the availability and use of communications technology to reduce dependency on travel in remote areas.</li> </ul> <p><b>Policy T8: Management of local roads</b></p> <p>The local road network will be managed so as to complement the aims of Policies T2 to T7, and with the following priorities:</p> <ul style="list-style-type: none"> <li>- reducing the growth of traffic and its environmental impact;</li> <li>- facilitating safe and efficient public transport, walking and cycling;</li> <li>- providing efficient vehicular access to locations and activities requiring it, in particular in areas where regeneration is dependent on improved access; and</li> <li>- improving safety and alleviating congestion.</li> </ul> <p><b>Policy T9: Walking and cycling</b></p> <p>Provision for walking and cycling will be improved and developed as part of a co-ordinated strategy for achieving the RTS objectives. Pedestrian and cycle networks will be managed to maximise their contribution to access to work, schools and town centres, and to provide access to the countryside, urban greenspace and recreational opportunities. Support will be given to completion by 2010 of the National Cycle Network in the region and linking it with local cycling networks to form continuous routes.</p> <p><b>Policy T10: Strategic movement of freight</b></p> <p>Priority will be given to the efficient movement of freight by all modes while seeking to increase the proportion of the region's freight movement carried on rail and by water. In particular:</p> <ul style="list-style-type: none"> <li>- high priority will be given to measures for improving rail freight capacity on routes leading to the region's ports;</li> <li>- provision will be made for at least one strategic rail freight interchange within the East of England, at a location with good</li> </ul>

Location / Para Number	Recommendation
	<p>access to the strategic rail routes and highway network; and</p> <ul style="list-style-type: none"> <li>- existing well-located wharves and facilities for rail and water freight interchange should be safeguarded for future use, and improved provision made in locations with good road and rail access to end users.</li> </ul> <p><b>Policy T11: Ports</b> Access to the region's ports will be managed and enhanced to support development as and when it is approved and to enable the ports to contribute to national and regional objectives in relation to economic growth and regeneration. In accordance with Policy T10, a key priority will be to maximise the proportion of freight, particularly longer distance freight, travelling to destinations beyond the region by rail as opposed to road.</p> <p><b>Policy T12: Airports</b> Access to the region's airports will be managed and enhanced to support development as and when it is approved and to enable the airports to contribute to national and regional objectives in relation to economic growth and regeneration. A key priority will be to ensure that airport surface access facilities reinforce and help to contribute to the shift to more sustainable travel sought by the RTS objectives.</p> <p><b>Policy T13: Public transport accessibility</b> Public transport provision will be improved and its use encouraged throughout the region by increasing the accessibility of an appropriate level of service to as high a proportion of households as possible. Table 8.1 provides a guide as to the minimum accessibility levels to be aimed for.</p> <p><b>Policy T14: Parking</b> Parking controls will be used as part of the packages of measures for influencing travel change under the policies of this RTS. Demand-constraining maximum parking standards will need to be set locally having regard to the progress of measures to improve public transport accessibility, walking and cycling, and to the need for a concerted approach between neighbouring centres. The standards in PPG13, as set out in Table 8.2, will be treated as a maximum, with more stringent standards no higher than 70% of PPG13 standards being applied in RTNs and in Key Centres for Development and Change in line with progress towards greater public transport provision.</p> <p><b>Policy T15: Transport investment priorities</b> Investment in transport schemes in the region will be prioritised according to the contribution they make to achieving the RTS</p>

Location / Para Number	Recommendation
	<p>objectives in Policy T1, and to achieving the priorities and objectives set out in (a) Policies T2 to T14 and (b) the transport priorities contained in the policies for sub-regions and Key Centres for Development and Change (as recommended in Chapter 5). Revisions of Local Transport Plans and future prioritisation exercises for regional transport investment should be based on these priorities. Appendix XXX lists the regionally significant transport investment currently programmed for the region, which will be subject to review from time to time.</p>
<b>Chapter 9</b>	
Para 9.4	<p><b>R9.1</b> Change Policy ENV1 as follows:</p> <p><b>Policy ENV1: Green infrastructure</b></p> <p>Areas and networks of green infrastructure will be identified, protected, created, extended, enhanced, managed and maintained throughout the region to ensure that an improved and healthy environment is available for the benefit of present and future communities. This will be particularly important in those areas identified to accommodate the largest amounts of growth in the region, whether or not officially recognised as such in the Sustainable Communities Plan.</p> <p>Local development documents will:</p> <ul style="list-style-type: none"> <li>- define a multiple hierarchy of green infrastructure, in terms of location, function, size and levels of use, at every spatial scale and across all areas of the region based on analysis of existing natural, historic, cultural and landscape assets, including the identification of new assets required to deliver green infrastructure;</li> <li>- identify and require the retention and provision of substantial connected networks of green space, in urban, urban fringe and adjacent countryside areas to serve the new communities in the sub-region by 2021; and</li> <li>- ensure that policies have regard to the economic and social as well as environmental benefits of green infrastructure assets.</li> </ul> <p>Assets of particular regional significance for the retention, provision and enhancement of green infrastructure are:</p> <ul style="list-style-type: none"> <li>- The Norfolk and Suffolk Broads, the only area in the region with status equal to a National Park, whose statutory purposes and influence need to be considered well beyond its formal boundaries</li> <li>- The North Norfolk Coast AONB</li> </ul>

Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- The Brecks: a unique area of landscape, ecological and recreational importance with increasing pressures for secure long-term management as a regional park or similar entity</li> <li>- Dedham Vale AONB</li> <li>- Suffolk Coast and Heaths AONB and associated areas of the Stour Estuary</li> <li>- The Great Fen Project</li> <li>- Wicken Fen Vision</li> <li>- Epping Forest</li> <li>- Hatfield Forest</li> <li>- Watling Chase Community Forest</li> <li>- Thames Chase Community Forest</li> <li>- Lee Valley Regional Park</li> <li>- The Chilterns AONB</li> <li>- Forest of Marston Vale</li> <li>- Milton Keynes to Bedford Waterway Park (a project to create a navigable connection between the Grand Union Canal and the River Great Ouse within a linear waterway park)</li> </ul> <p>Urban green infrastructure networks, especially (but not exclusively) at the “Key Centres for Development and Change” and including the “Greening the Gateway” project and the “Green Arc” project around the fringes of Greater London.</p>
Para 9.9	<p><b>R9.2</b> Change Policy ENV2 as follows:</p> <p><b>Policy ENV2: Landscape conservation</b></p> <p>Planning authorities and other agencies in their plans, policies, programmes and decision-making will, in accordance with statutory requirements, afford the highest status of protection to the East of England's nationally designated landscapes – the Norfolk and Suffolk Broads (having status equal to a National Park) and the Chilterns, Norfolk Coast, Dedham Vale, and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty (AONBs). Within the Broads priority will be given to the statutory purposes of conserving and enhancing the natural beauty, promoting public enjoyment and protecting the interests of navigation. Within the AONBs priority over other considerations will be given to conservation of the natural beauty, wildlife and cultural heritage.</p> <p>Throughout the East of England planning authorities and other agencies in their plans, policies, programmes and decision-making will aim to recognise, protect and enhance the diversity and local distinctiveness of the countryside character areas indicated on</p>

Location / Para Number	Recommendation
<p>Para 9.14</p>	<p>Map 9.1 by:</p> <ul style="list-style-type: none"> <li>- developing area-wide strategies, based on landscape character assessments, setting long-term goals for landscape change, targeting planning and land management tools and resources to influence that change, and giving priority to those areas subject to most growth and change;</li> <li>- developing criteria-based policies, informed by the area-wide strategies and landscape character assessments, to ensure that all development, wherever possible respects and enhances local landscape character; and</li> <li>- providing/requiring appropriate mitigation measures where avoidance of damage to local landscape character is unavoidable.</li> </ul> <p><b>R9.3</b> Change Policy ENV3 as follows:</p> <p><b>Policy ENV3: Biodiversity and earth heritage</b></p> <p>Planning authorities and other agencies in their plans, policies, proposals and decision-making will ensure that the internationally and nationally designated sites in the region are given the strongest level of protection.</p> <p>Planning authorities and other agencies in their plans, policies, proposals and decision-making will ensure that proper consideration is given to the potential effects of development on the conservation of (a) habitats and species outside designated sites and (b) species protected by law.</p> <p>Beyond these particular requirements, the region’s wider biodiversity, earth heritage and natural resources will be protected and enriched through conservation, restoration and re-establishment of key resources by:</p> <ul style="list-style-type: none"> <li>- ensuring that new development minimises damage to biodiversity and the earth heritage resource by (a) avoiding harm to county wildlife sites and (b) wherever possible on all development sites, achieving net environmental gains through enhancement measures and new habitat creation;</li> <li>- promoting the conservation, enhancement, restoration, re-establishment and good management of habitats and species populations in accordance with the East of England regional biodiversity targets in Appendix B, the targets set out in the UK, England and local biodiversity action plans, and the priorities established in the East of England Regional Biodiversity Network Map (see Map 9.2);</li> <li>- identifying and safeguarding areas for habitat restoration and re-establishment, in particular for large-scale (greater than 200-</li> </ul>

Location / Para Number	Recommendation
Para 9.16	<p>ha) habitat restoration for human and wildlife benefit;</p> <ul style="list-style-type: none"> <li>- identifying, safeguarding, conserving, and restoring regionally important geological and/or geomorphological sites (RIGS) and promoting their good management;</li> <li>- ensuring the appropriate management and further expansion of wildlife corridors that are important for the migration and dispersal of wildlife; and</li> <li>- establishing networks of semi-natural green spaces in built up areas as part of the process of developing more sustainable, safer, secure and attractive urban and built forms.</li> </ul> <p>The East of England Regional Assembly will establish effective co-operation with authorities from neighbouring regions on cross-border issues which require inter-regional co-ordination, specifically with regard to the Wash and the Thames Estuary together with important landscape and biodiversity initiatives such as the Chilterns Management Strategy, and more widely in relation to the potential impacts of climate change, water transfer and waste management.</p> <p><b>R9.4</b> Change Policy ENV4 as follows:</p> <p><b>Policy ENV4: Woodlands</b></p> <p>Planning authorities and other agencies in their plans, policies, proposals and decision-making will seek to achieve an increase in woodland cover in the region both by protecting and achieving better management of existing woodland and by promoting new planting where it would be consistent with landscape character.</p> <p>Protection of existing woodlands: all ancient semi-natural woodland and other woodlands of acknowledged national or regional importance will be identified in Local Development Documents with a strong presumption against development that would result in their loss or deterioration; aged or veteran trees will also be conserved. The nature conservation value of all woodlands is recognised and conversion of any woodland to other land uses will be resisted unless there are overriding public and ecological benefits. Woodland unavoidably lost to development should be replaced with new woodland of at least equivalent area and composition, preferably in the same landscape unit.</p> <p>New woodland creation should be targeted specifically at:</p> <ul style="list-style-type: none"> <li>- schemes for the restoration of derelict or contaminated land and sites formerly used for mineral-extraction or industry;</li> <li>- green infrastructure projects at towns planned for significant growth (eg through the Sustainable Communities Plan);</li> </ul>

Location / Para Number	Recommendation
<p>Para 9.17</p>	<ul style="list-style-type: none"> <li>- the Thames Chase, Watling Chase and Forest of Marston Vale Community Forests, with the aim of increasing their woodland cover to 30% by 2030;</li> <li>- planting schemes along transport corridors; and</li> <li>- schemes to expand and link areas of native woodland and create new wet woodland (which is a priority in this region).</li> </ul> <p><b>R9.5</b> Change Policy ENV5 as follows:</p> <p><b>Policy ENV5: The historic environment</b></p> <p>Planning authorities and other agencies in their plans, policies, proposals and decision-making will identify, protect, conserve and, where appropriate, enhance the historic environment of the region, its archaeology, historic buildings and places and historic landscapes, including those features and sites (and their settings) especially significant in the East of England:</p> <ul style="list-style-type: none"> <li>- the internationally renowned historic cities of Cambridge and Norwich;</li> <li>- an exceptional network of historic market towns;</li> <li>- a cohesive hierarchy of smaller settlements ranging from nucleated villages, often marked by architecturally significant medieval parish churches, through to a pattern of dispersed hamlets and isolated farms;</li> <li>- the highly distinctive historic environment of the coastal zone including extensive submerged prehistoric landscapes, ancient salt manufacturing and fishing facilities, the relict sea walls of grazing marshes, coastal fortifications, ancient ports and traditional seaside resorts;</li> <li>- formal planned settlements of the early twentieth century, including the early garden cities, and factory villages;</li> <li>- conservation areas and listed buildings, including domestic, industrial and religious buildings, and their settings, and significant designed landscapes;</li> <li>- the rural landscapes of the region, which are highly distinctive and of ancient origin; and</li> <li>- the wide variety of archaeological monuments, sites and buried deposits which include many scheduled ancient monuments and other nationally important archaeological assets.</li> </ul>
<p>Para 9.18</p>	<p><b>R9.6</b> No change to Policy ENV6: Agriculture, land and soils</p>
<p>Para 9.19</p>	<p><b>R9.7</b> Delete Policy ENV7</p>

Location / Para Number	Recommendation
Para 9.27 & 9.32	<p><b>R9.8</b> Revise Policy ENV8 to the form of two separate policies for renewable energy and energy efficiency, changed as below. Appendix C should be deleted and the supporting text to the policies below should set out the proposed timetable for putting in place fuller regional guidance for renewable energy.</p> <p><b>Policy ENV8: Renewable energy</b></p> <p>The development of new facilities for renewable power generation will be supported, with the aim of meeting the following regional targets:</p> <p><u>By 2010</u></p> <p>At least 1192 Megawatts of installed capacity for renewable energy</p> <p><u>By 2020</u></p> <p>At least 4250 Megawatts of installed capacity.</p> <p>These targets are equivalent to 14% of total electricity consumption in the East of England (or 10% excluding offshore wind) by 2010, and 44% (17% excluding offshore wind) by 2020.</p> <p>The above targets are subject to revision and development in an early review of this RSS.</p> <p>LDDs should support renewable energy development by including appropriate policies following the general approach set out in PPS22, pending the provision of more specific regional guidance on location or technology specific criteria through the review of this RSS.</p> <p><b>New Policy (ENV9): Energy efficiency</b></p> <p>In order to meet regional and national targets for reducing climate change emissions, high standards of energy efficiency will be sought in all development. Local authorities in the region should:</p> <ul style="list-style-type: none"> <li>- maximise opportunities, particularly in major growth locations and in Key Centres for Development and Change, for developments which set new standards in energy efficiency, reducing emissions and the on-site use of renewable energy technology;</li> <li>- promote innovation through masterplanning exercises and development briefs; and</li> <li>- promote greater energy efficiency in development throughout their area by including appropriate policies within Local</li> </ul>



Location / Para Number	Recommendation
Para 9.42, 9.45 & 9.47	<p>Development Documents in line with the guidance in PPS22 and its companion guide.</p> <p><b>R9.9</b> Replace Policy ENV9 with a set of Policies relating to water issues as follows:</p> <p><b>Policy ENVxx: Water efficiency</b></p> <p>The Government will work with the Environment Agency, water companies and regional stakeholders to ensure that the development provided for in the Spatial Strategy is matched with improvements in water efficiency so as to effect savings of at least 25% compared with 2006 levels of water use in all new development, and savings of at least 8% in existing development. This will be pursued through a co-ordinated programme of measures including changes to Building Regulations and other appropriate regulatory regimes, fiscal measures, incentive schemes and other measures to reduce water consumption and wastage.</p> <p><b>Policy ENVxx: Water resource development</b></p> <p>The Environment Agency and the water companies will work together with OFWAT, EERA and the neighbouring regional assemblies, the local authorities, the delivery agencies and others to ensure timely provision of sufficient enhanced infrastructure capacity for both water supply and waste water treatment to cater for the increased levels of development provided through this plan.</p> <p><b>Policy ENVxx: Integrated water cycle studies</b></p> <p>The Environment Agency will co-ordinate a programme of Strategic Integrated Water Cycle Studies to address the water and wastewater treatment issues relating to growth proposed in this RSS and to the options for additional development locations. Such studies will involve the water industry and other regional stakeholders and should be completed in time for the findings to be taken into account in the next RSS review.</p> <p><b>Policy ENVxx: Planning for water resources and waste water</b></p> <p>Complementing the approach of Policies ENVxx to ENVxx, local development documents will plan to site new development so as to maximise the potential of the existing water/waste water treatment infrastructure and minimise the need for new/improved infrastructure. New development may need to be phased to ensure that it does not exceed the capacity/environmental limits of the infrastructure or proceed ahead of assured completion of planned improvements.</p> <p>The Environment Agency will work with other relevant partners in the region to ensure that their plans and decision-making take account of the environmental consequences of river basin management plans, catchment abstraction management strategies, groundwater vulnerability maps, groundwater source protection zone maps, proposals for water abstraction, and proposals for</p>

Location / Para Number	Recommendation
	<p>provision of on-farm water storage facilities.</p> <p>The East of England Regional Assembly will work with other public bodies in the region to devise a code for the adoption of high standards of water efficiency in new buildings which are publicly owned or funded (or occupied by public bodies) and in appropriate works of repair/refurbishment to such buildings.</p>
<b>Chapter 10</b>	
Para 10.8	<p><b>R10.1</b> Revise Box 9.1 to form a new Policy WM1 setting out objectives for waste management in the region, as follows:</p> <p><b>Policy WM1: Objectives for waste management</b></p> <p>In implementing the overall vision and objectives of the Regional Spatial Strategy, waste management policies will seek to meet the following regional objectives:</p> <ul style="list-style-type: none"> <li>- to move the management of waste up the waste hierarchy of reduction, re-use, recycling, composting and energy recovery, with disposal as a last resort;</li> <li>- to ensure timely and adequate provision of the facilities required for management, recycling, processing and disposal of the region’s waste in all waste streams, and including wastes imported into the region for the time being;</li> <li>- to minimise the impact of new development, particularly the concentrations of growth in the Key Centres of Development and Change, on regional waste management requirements;</li> <li>- to reduce the environmental impact of waste management; and</li> <li>- to enlist and encourage community support and participation in promoting responsible waste behaviour, viewing waste as a resource and maximising re-use, recycling and composting of waste, while responding positively to the need to manage the remainder.</li> </ul>
Para 10.9	<p><b>R 10.2</b> Replace policy ENV10 with a new Policy <b>WM2: Planning for waste management</b>, incorporating changes to reflect the new approach of PPS10 and incorporating relevant policy guidance form the existing RWMS. The policy should include the following changes:</p>

Location / Para Number	Recommendation
	<ul style="list-style-type: none"> <li>- replacing the references to BPEO and the proximity principle with appropriate new wording;</li> <li>- including bullet points requiring waste development documents to ensure provision for sites of sufficient number and capacity to manage the tonnages of wastes for each MPA identified in the regional waste apportionment policy; and</li> <li>- identifying, on the basis of the apportionment policy, and the targets for waste management, the additional capacity likely to be required in each MPA/virtual county for recovery, recycling, treatment and disposal of wastes. This should specify the general type of facility and its locational requirements, while leaving flexibility for innovation and local determination of the precise type and size of facilities.</li> </ul> <p>Omitting the final paragraph (see Policy WM3 below)</p>
Para 10.10	<p><b>R10.3</b> Add a new Policy <b>WM3: Waste management in development</b>, based on the final paragraph of Policy ENV10, but emphasising the role of strategically significant development in the Key Centres for Development and Change in achieving progress towards sustainable management of waste through innovative approaches to local waste reduction, recycling and management.</p>
Para 10.11	<p><b>R10.4</b> Change Policy ENV11 to become <b>Policy WM4: Waste management targets</b>, the targets for Municipal solid waste and commercial and industrial waste should be extended to provide targets for achievement by 2021. Either within the policy or in the supporting text, the implications of these targets should be expressed as tonnages needing to be recycled annually for each of the waste streams, based on the latest available figures.</p>
Paras 10.6, 10.11, 10.17 & 10.20	<p><b>R10.5</b> Include a new Policy <b>WM5: Regional waste apportionment</b>, this should set out the tonnages of waste to be managed in each WPA/virtual county area by 5 year intervals up to 2021. It should be based on the output of the apportionment exercise (document MNW5B), or on such alternative or modified version as may be agreed after work by EERA and the RTAB before publication of the changes to the draft Plan. The apportionment should identify separately the tonnages of waste expected to be imported from London either as residues for disposal or untreated waste for processing and disposal.</p>
Para 10.12	<p><b>R10.6</b> Change Policy ENV12 to form a new Policy <b>WM6: Regional and sub-regional self-sufficiency</b>, this should maintain the general principle of ensuring that the region deals with its own waste management needs and progressively reducing the import of wastes for treatment from outside the region. The specific targets proposed in the policy may need to be reassessed in the light of the apportionment exercise.</p>
Para 10.13	<p><b>R10.7</b> Retain Policy ENV13 as <b>Policy WM7: Hazardous waste</b>, changed if appropriate by expanding it to include reference to construction and demolition waste and to reflect any more specific information arising from current further studies</p>

Location / Para Number	Recommendation
Para 10.17	<p>before the publication of draft Plan changes.</p> <p><b>R10.8</b> Include a new Policy <b>WM8: Waste management in the Marston Vale</b>, based on draft Plan Policy BL2, but making the point that the use of potential landfill capacity in the Marston Vale should provide for a reducing annual tonnage over time, and should be limited so as not to compromise objectives for environmental regeneration and housing provision in the Vale in connection with its role in the MKSM Growth Area. The Policy should also cross refer to the Bedfordshire allocation in the regional apportionment policy WM5 above, and indicate that any future review of the apportionment should take account of the need to avoid conflict between waste management and other objectives within the Vale.</p> <p><b>R10.9</b> Include policy, drawn from the non-land use policies of the RWMS (2003), to provide a framework for the non-planning actions required to complement Policies WM2 to WM8 in order to achieve the objectives of the RWMS as part of the Regional Spatial Strategy.</p> <p><b>R10.10</b> Delete Policy ENV14, but replace it with a reference in supporting text to the future role of the RWMS once it has been reviewed, in providing more detailed technical advice for implementation of the RSS waste policies. The supporting text should also refer to the programme for further developing the RWMS policies within the RSS through the first review. It should refer in particular to the establishment of an inter-regional forum on waste with the relevant authorities in the South East of England and Greater London, and to the participation of the East of England in such a forum with a view to ensuring a harmonised approach across the three regions towards future rounds of strategic planning for waste management.</p>
<b>Chapter 11</b>	
Para 11.2  Paras 11.12 & 11.19	<p><b>R11.1</b> Revise the form and content of the RSS, including the Key Diagram, RTS diagram and other illustrations in line with our conclusions in paragraphs 11.1-11.7 above.</p> <p><b>R11.2</b> Replace policies IMP1, IMP2 and IMP3 as follows:</p> <p><b>IMP1: Implementing the RSS</b> Implementation will be secured through:</p> <ul style="list-style-type: none"> <li>- the establishment of a regional co-ordinating body which will devise a region-wide implementation plan including a broad prioritised infrastructure budget, secure sufficient funding for essential physical and social infrastructure to be provided in</li> </ul>

Location / Para Number	Recommendation
<p>Paras 11.22 &amp; 11.27</p>	<p>step with regionally and locally identified needs, and arbitrate in the case of disputes;</p> <ul style="list-style-type: none"> <li>- ensuring early preparation of LDDs for the sub-regions and key centres of development and change and identifying any critical infrastructure or service milestones; and</li> <li>- the work of individual Local Delivery Vehicles (LDVs) with responsibility for implementing the approved proposals for the sub-regions and key centres of development and change. The roles, functions and compositions of the LDVs will be locally determined and vary according to circumstances but must be strong enough to meet the nature and scale of the local challenges.</li> </ul> <p>(Update the supporting text with what is currently known about the pattern of LDVs, recognising that the information currently included in IMP3 is out-of-date and not comprehensive.)</p> <p><b>R11.3</b> Replace IMP4 with a new policy IMP2 as follows:</p> <p><b>IMP2: Monitoring the RSS</b></p> <p>Annual monitoring will track the delivery of development and all the related components of sustainable communities, focusing particularly on:</p> <ol style="list-style-type: none"> <li>a) Progress towards delivery of infrastructure of all types necessary to support development and economic success;</li> <li>b) Progress in the delivery of housing and evidence of housing need and housing market conditions, including affordability;</li> <li>c) Progress in the development of the region’s economy, in particular the growth of employment and its alignment with housing and population growth; and</li> <li>d) Delivery of the environmental and other objectives of the RSS, in particular with regard to water consumption and emissions.</li> </ol> <p>The results of such monitoring will be considered by the regional co-ordinating body referred to in Policy IMP1, which will consider any need to review regional budgets and other aspects of implementation.</p> <p>EERA will publish an annual monitoring report and thereafter consider whether its findings indicate a need for any particular action(s) to be taken to implement the policies of the RSS and/or any need for its policies to be reviewed.</p> <p>EERA will also keep its monitoring arrangements under review, in liaison with local authorities and other key partners. A particular aim will be to improve the efficiency and effectiveness of the monitoring process by ensuring that reliable and</p>

Location / Para Number	Recommendation
Para 11.27	<p>appropriate indicators have been set and clear mechanisms put in place for collection of the necessary data.’</p> <p><b>R11.4</b> Change Appendix D to reflect the alterations to the RSS policies and the general observations set out at paragraphs 11.20-11.27 above.</p>
Para 11.34	<p><b>R11.5</b> Include a new policy IMP3 to read as follows:</p> <p><b>IMP3: Review of the RSS</b></p> <p>A review of the RSS will be undertaken to investigate and make provision for the development needs of the East of England for the period 2011 to 2031. The review will consider spatial options, including the role of one or more large new settlements within the region and, if appropriate, will make proposals for:</p> <ul style="list-style-type: none"> <li>- the role of any new settlement in relation to spatial, economic social and environmental criteria;</li> <li>- the location(s) for the development; and</li> <li>- implementation mechanisms.</li> </ul> <p>The supporting text to the policy should refer to the intended broad timetable for the review and its approach and scope, having regard to the points considered at paragraphs 11.28-11.32 above.</p>

## **APPENDIX A**

### **ABBREVIATIONS USED IN REPORT**





## EAST OF ENGLAND PLAN

Examination in Public – 1 November – 16 December 2005 and 17 January – 1 March 2006

### Abbreviations used in the Report

AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
APU	Anglian Polytechnic University
ARP	Area Regeneration Partnership
ASR	Area of Special Restraint
ATWP	Air Transport White Paper
AWRUC	Area-wide Road User Charging
BAA	British Airports Authority
BAU	Business as Usual
BC	Borough Council
BPEO	Best Practicable Environmental option
BREEAM	BRE Environmental Assessment Method
CA	Countryside Agency
CBC	Colchester Borough Council
CC	County Council
C&D Waste	Construction and Demolition Waste
C&I Waste	Commercial and Industrial Waste
CHP	Combined Heat and Power
CNF	Cambridge Northern Fringe
CPRE	Campaign to Protect Rural England
CSR	Cambridge Sub Region
DC	District Council
DCLG	Department for Communities and Local Government
DCMS	Department for Culture, Media and Sport
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department for Environment, Transport and the Regions
DfT	Department for Transport
DPD	Development Plan Document
EA	Environment Agency
ECC	Essex County Council
ECML	East Coast Main Line

EEDA	East of England Development Agency
EERA	East of England Regional Assembly
EFDC	Epping Forest District Council
EHDC	East Herts District Council
EiP	Examination in Public
EMRA	East Midlands Regional Assembly
EN	English Nature
EoE Cons	East of England Consortium
Essex ALC	Essex Association of Local Councils
ETG	Essex Thames Gateway
EU	European Union
FHDC	Forest Heath District Council
FOE	Friends of the Earth
FSoS	First Secretary of State
GLA	Greater London Authority
GO-E	Government Office for the East of England
HA	Highways Agency
ha	hectare
HBF	Home Builders' Federation
HCC	Hertfordshire County Council
HGP	Haven Gateway Partnership
HQPT	High Quality Public Transport
ICT	Information, Communication and Technology
IER	Institute for Employment Research
IPA	Ipswich Policy Area
JEDS	Joint Economic Development Strategy
KCDC	Key Centres for Development and Change
KLWNBC	King's Lynn and West Norfolk Borough Council
LDD	Local Development Document
LDF	Local Development Framework
LDHR	Luton, Dunstable and Houghton Regis
LDV	Local Delivery Vehicle
LP	Local Plan
LPA	Local Planning Authority
LSCP	London/Stansted/Cambridge/Peterborough Growth Area
LTP	Local Transport Plan

MKSM	Milton Keynes South Midlands (Sub Regional Strategy)
MSDC	Mid Suffolk District Council
MSW	Municipal Solid Waste
NEG Study	Norfolk Employment Growth Study
NNTAG	Norwich and Norfolk Transport Action Group
NPA	Norwich Policy Area
NSR	Norwich Sub Region
ODPM	Office of the Deputy Prime Minister
OFWAT	The Water Services Regulation Authority
ONS	Office of National Statistics
pa	per annum
PAER	Priority Area for Regeneration
PC	Parish Council
PCP	Planning and Compulsory Purchase Act
PDL	Previously Developed Land
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RES	Regional Economic Strategy
RFA	Regional Funding Allocation
RFI	Rail Freight Interchange
RHS	Regional Housing Strategy
RIC	Regional Interchange Centre
RPA	Regional Planning Guidance
RPB	Regional Planning Body
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
RTAB	Regional Waste Technical Advisory Body
RTN	Regional Transport Nodes
RTP	Roger Tym & Partners
RTS	Regional Transport Strategy
RUS	Route Utilisation Strategy
RWMS	Regional Waste Management Strategy
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SAC	Special Areas of Conservation
SBDC	South Bedfordshire District Council
SCP	Sustainable Communities Plan

SDS	Sustainable Development Strategy
SEBC	St Edmundsbury Borough Council
SEERA	South East of England Regional Assembly
SHN	Stop Harlow North
SI	Shared Intelligence
SMART	Specific, Measurable, Achievable, Realistic, Timely
SoS	Secretary of State
SP	Structure Plan
SPD	Supplementary Planning Document
SR	Sub Region
SRA	Strategic Rail Authority
SRS	Sub Regional Strategy
SSSI	Sites of Special Scientific Interest
STW	Sewage Treatment Works
TC	Town Council
TCPA	Town and Country Planning Association
TGSE	Thames Gateway South Essex
TTGUDC	Thurrock Thames Gateway Urban Development Corporation
UA	Unitary Authority
UDC	Urban Development Corporation
UDP	Unitary Development Plan
WHDC	Welwyn Hatfield District Council
WPA	Waste Planning Authority