



Campaign to Protect
Rural England
EAST OF ENGLAND

Summary of the Panel Report
from the
Examination in Public of the
East of England Plan (RSS14)

1. Overview

- 1.1. Panel Report increases the housing numbers from 478,000 to 505,500. These are relatively modest additions (compared to the latest Government household projections)
- 1.2. It is quite clear that the Panel has not taken the household projections at face value, and has recognised that, whatever the figure appears in the Plan, reaching those targets is a completely different matter. This is explained in part by the level of delivery which would have to be achieved and which would have to be at a higher rate than currently the construction industry delivers. Coupled with the need for increased infrastructure of all kinds, there is some question as to deliverability.
- 1.3. Apart from the issue of how much green field land this will all take and its implications for our Region, what is extremely promising is the Panel Report's treatment of the environment; including landscape, the water issue, and the climate change issue.
- 1.4. Many issues have been left to Local Development Documents (LDDs) to determine; this may or may not be a cop out on the Panel's part and it does leave us asking the question of whether some of the matters are implementable. The concern being that there may not be enough guidance for LDDs to ensure they know what is required. For example no target for affordable homes for Local Authorities (LAs), just a monitoring target at the regional level, how will this be achieved what will be the imperative for LAs?
- 1.5. Transport has been given a revamp to make it actually address the objectives of the Plan. Not least to reduce our impact on the climate through a focus on reducing the need to travel and modal shift. The tables of schemes have been partly due to the fact that they were not subject to the Strategic Environmental Assessment (SEA). But also that the Plan should focus on outcomes rather than schemes.
- 1.6. North Weald and Harlow North and the concept of a single Stansted /M11 sub region have been discarded by the Panel, there will not be a green belt review in Essex TG or Bishops Stortford, and some compensatory greenbelt is proposed. But the bulk of GB reviews are retained by the Panel albeit more focussed. These will be dealt with at the LDD level.
- 1.7. Another significant issue is that we are reaching the state where development associated with one town is actually in the next district and therefore far more cross boundary working is going to be required. It begs the questions as to whether today's boundaries and resourcing mechanisms for authorities are appropriate for tomorrow's world.
- 1.8. Below is a summary of the main points with comment. This is structured as the Panel Report for ease of referencing. There is no coverage of Chapter 1 as this was just an introduction without much content.

2. Chapter 2 Overview

- 2.1. This chapter outlines a number of key changes and background to them, and these are picked up again though the various chapters so this overview will cover some of the topics picked up in more detail in later chapters, so some repetition.
- 2.2. The Panel Report states that it has tried to pull together the two agendas – protection of environment and growth and points out that whilst the region has limited impact on climate change it can't ignore it – and the need to make a contribution to sustainable development.
- 2.3. Water is given special mention and the Panel reiterates that *'by whatever route is achieved, all new development in the region must secure water savings of at least 25% over current consumption'*.. The Panel also suggests that there is a wider question as to how to address these issues: the water industry must be part of planning, not merely follow it.
- 2.4. One of the reasons for the discussion of long term spatial options (new settlements) is that the Panel wants the Environment Agency and the water industry to be more pro-active and interactive in the planning system (2.6).
- 2.5. The policy within the Plan of moving towards alignment of jobs and housing is supported by the Panel but the precision of numbers is not. The Report points out that despite what the Regional Assembly (EERA) says the; *'Idea of jobs-led strategy is largely illusory' and limits to sound science begin to be apparent'*. (2.7).

Comment: But, if we are to provide houses there must be some link with the provision of jobs otherwise all we are doing is supporting out commuting and increasing travel.

- 2.6. The Panel has taken the household projections and whilst not accepting them at face value has taken them as an indication of the scale of need and has **increased housing by 27,500 homes**, but says this is not related to Lord Rooker's demand for 18,000 houses, which was related to the London Stansted Cambridge Peterborough (LSCP) growth area. This is considerably lower than the household projections figure. The Report also quite clearly states that this *represents 'maximum that we believe can be delivered'* particularly over early years, and is 30% over current levels of 20,000 per year to 26,000 per annum (from 2006).
- 2.7. The report goes on to suggest that even higher figures could be achieved beyond 2016 but that *'to be done in a sustainable way ...fundamental issues need to be tackled – water, climate change, sustainable transport and searching evaluation of spatial options, including the role of new settlements, also a broader perspective including North-South issues'*.
- 2.8. However, their suggestion that by putting growth in Peterborough and Norwich which are on slightly more Northerly latitudes than Birmingham they are attempting to steer growth north! (2.13). Perhaps this was rather tongue in cheek?
- 2.9. The concentration of development in urban areas is endorsed by the Report. The biggest housing increase is recommended for Norwich, Peterborough, Ipswich and Cambridge, with each growing by 20,000-33,000 (the size of a small town) Whilst, the figures for Harlow have been upped, Harlow North and North Weald, have been dismissed. The report also redistributed extra growth between the new towns and Basildon.
- 2.10. As a sustainability principle the Report supports prudent use of land, and therefore use of previously developed land (known as PDL or brownfield), but then goes on to

point out that level of growth will require Greenfield development and strategic reviews of Green Belt (GB). What they suggest, is that development on such a scale can't be massaged through without changing anything.

- 2.11. The report makes it clear that the revised environment policies (ENV) and other policies are *'intended to ensure that where development takes place it makes a positive contribution to providing better urban living environments'* (2.16) and the policy on Green Infrastructure – *'ensuring that rapid urban development goes hand in hand with strengthening the region's green assets'*. (2.16).
- 2.12. The Report goes on to say that : *'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 from urban development either now or in the future. Keeping it that way is, despite the focus on growth and development an important aim of the RSS'* (pages 6&7, 2.16). That remains to be seen.
- 2.13. In the regional transport strategy (RTS) chapter, the Panel Report agrees about the contradictory nature of the RTS. It states that the RTS *'embodies the greatest challenge for the region in achieving sustainable development'* (2.17). The report points out that reducing the need to travel has been policy for some 10 years. The RTS needs to be a framework to bring this about. The report includes a message here about resources for Department for Transport (DfT) and Local transport Authorities (LTA) of whom it says *'may need more scope for managing bus networks'*.
- 2.14. The issue of an infrastructure deficit arise here and it appears that the Panel agrees that it isn't so much a roads deficit as a public transport deficit and making alternatives to the car viable. However, the Panel points out that a shift of emphasis away from road schemes may not go far in releasing the resources needed as such schemes are often required to improve bus networks. (2.19)
- 2.15. In the Panel's opinion, the EE Plan is regarded as too detailed and is more like a structure plan, and the Panel has attempted to delineate between the strategic and the local, leaving much to LDDs (in fact there are 106 mentions of LDDs in the document) but then suggests that the RSS must lay out tasks for LDDs.
- 2.16. The sub regions chapter of the EE Plan is torn apart and the Panel suggests that sub-regions should be used sparingly (from 14 down to 4). The explanation is that the Plan should be much more strategic, and therefore contain less detail which should be left to LDDs.
- 2.17. In discussion on the SEA and meeting the legislative requirements, the Panel gives some serious discourse on the issue of omissions sites and addressing the consultation deficit, and also the sustainability statements which were required for each developer's omissions site. The report says that the sustainability statements were not an unqualified success. It was *'apparent that promoting participants had difficulty in taking an objective view of what was a positive or negative environmental effect'*. (2.26)

3. **Chapter 3 Context Soundness, strategic issues and objectives**

- 3.1. This chapter looks at the soundness of the Plan, and discusses the SEA/ and Sustainability Appraisal (SA). The Report states that the SEA findings were

important for framing of matters for EiP and that the recommendations are intended to improve the Plan in relation to matters identified in SEA.

- 3.2. Consideration of the SEA covered is in 3.4-3.11. Here the Panel recommends further work on changes at the same time as the consultation on changes and also the need to ensure that the changes recommended in the Panel Report adequately address the issues in the SEA.
 - 3.3. The issue of Habitats directive (which was dropped into the EiP following the European court finding against the UK) and the need for appropriate assessments of impacts on designated sites is considered specifically to be related to some road schemes. This is given as one reason for adopting the 'outcome driven approach rather than tying the strategy to specific schemes
 - 3.4. The report indicates that the SA needed to be better on the social and other grounds. It sees SA rather like an MOT. No guarantee that best policy choice is made even if you meet the 12 steps. There is a degree of criticism of PPS11 paragraphs 2.48-2.49 (3.12) and their possible interpretation and goes on to suggest the need for clearer national policy and guidance.(3.13)
 - 3.5. The divergence of policy emphasis between Sustainable Communities Plan (SCP) and Sustainable development Strategy – Securing the Future (SDS) is given some airing – the thrust for growth versus climate change and environmental limits (3.15). The report goes on to debate one of the most quoted (by environmentalists including CPRE) parts of the SEA, the debate about growth being 'intrinsically damaging to the environment'. The Panel challenges the argument (3.16) suggesting that one region simply cannot opt out of growth. Then in 3.17 it outlines need to take on board growth agenda and environmental agenda and climate change to produce a strategy to address both!
 - 3.6. However the report also stresses that business as usual would not result in sustainable development, as this would instead lead to shortage of housing, congestion, falling public transport use and rising energy consumption.
 - 3.7. *'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'* (3.18)
 - 3.8. In this chapter the Panel also outlines the need for a review (3.19) and also the perception that other regions need the growth and that it could be more easily absorbed elsewhere, but that the region needs to deal with its own growth requirements.
- Comment:** We would agree with that but not the need to fulfil requirements of London and international migration, as this we suggest would be inherently unsustainable (3.20).
- 3.9. There is also some discourse about how far we can go in bringing water into the region and just how far public funding can be expected to go, the implications being that there is only so much available. There is a key issue mentioned here: the need to steer development to where water is in future (a North-South issue?) (3.12).
 - 3.10. A question for Government here where the Panel expresses a difficulty in saying whether Plan is sound in terms of realism about resources. The report states it is not advocating a national strategy and then goes on to elaborate on what it might cover

in 3.23 and suggest that work needs to be done on a broad **inter regional review** (R3.3 p21).

4. **Vision and objectives**

- 4.1. Obviously the Panel felt that the vision in the Plan didn't do the job and has created its own, followed by setting out a series of 5 outcomes/objectives to deliver that vision and action to lead to those outcomes.
- 4.2. The first one being reducing the region's impact on and exposure to the effects of climate change. Within those objectives the Panel addresses climate change, modal shift, reducing the need to travel, moving away from car use, energy, water, affordable housing alignment, green infrastructure environmental protection (3.25 p19). For example: **Objective 5 To improve 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.**
- 4.3. Re-using previously developed land and seeking environmental as well as development gains from the use of previously undeveloped land which is a requirement of S106 agreements is spelt out here. Perhaps to emphasise to LAs that S106s must be used for green infrastructure too.

Comment: We would have to ask is it not better for the environment to leave green fields undeveloped?

5. **Chapter 4 Spatial Strategy**

- 5.1. One of the most important chapters in the Plan as this provides the overarching policies for the whole region from which all others stem. Most of the policies are directed at actions to be taken at LDD level, by local authorities.
- 5.2. There is some debate about environmental limits/capacity and a CO₂ target. The gist is that there are difficulties in assessing the carbon effect of RSS policies and only so much which can be achieved through the Spatial Strategy
- 5.3. *'An appropriate degree of realism and honesty is also required about what an RSS can and cannot contribute to in the cause of combating climate change'. (4.6)*
- 5.4. However despite what appears to be a dismissal of the arguments the report goes on to agree that climate change and living within environmental limits should assume a more central place in the Plan and goes on to set out 4 objectives which the Panel says that planning needs to address (4.7), and also that it would be helpful for 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.

The points set out are:

- (a) recognise and work with, rather than against, change already recognized 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” judgment.

5.6. This is a similar list to that in the decision making hierarchy of the Integrated Regional Strategy.

5.7. A quite clearly set out aim is to ensure climate change, sustainable development and sustainable communities are central considerations of the Plan. Unusually, the Panel seeks to include reference to the definition of sustainable communities in the ODPM’s Sustainable Communities - Homes for All, and the principles of sustainable development taken from the Sustainable Development Strategy – Securing the Future.

5.8. The proposed new overarching policy SS1 R4.1 is significant for making the environment central within the Plan. This has clarified the principles underlying the Plan and is significant in its enshrining National policy and its clear guidance for LDDs to take account of climate change.

5.9. It is reproduced here.

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, summarized 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:

- maximizes 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.

5.10. The report goes on to restructure the SS policies, deleting 6 of the originals suggesting the matters are covered elsewhere, and indicating where the policies should go, with or without some rewording, and also creating three further new ones.

5.11. Previously Developed Land (known as PDL or brownfield) prioritisation is discussed. The Panel did not agree that a new increased (above the national one of 60%) target should be in the Plan, but did concur with the argument that urban concentration can facilitate its use, but the Panel states clearly that that the need to prioritise PDL did not override the need to bring forward enough land to ensure the planned level of development is delivered. (4.19)

5.12. However, SS2 is significant in that it sets out the sequential approach setting reuse of PDL as a priority although there are caveats in the accompanying note below it, but, even the caveat has a caveat! Where it suggests that it may be necessary to bring forward green field land to meet requirements '*provided this is otherwise consistent with sustainable development.*' (P31 SS2)

5.13. SS3 key regional centres for development and change here the Panel has taken the list of towns from the original SS2 added the New Towns and are recommending that LAs work together on coordination and delivery.

5.14. By providing a new policy SS4 (Development in Other Towns and Rural Areas) and deleting the original SS9 (Development in Rural Areas) thus making rural areas more prominently covered at the beginning of the series of spatial policies, the Panel took on board the confusion at the EiP over the adequacy of the treatment of rural areas.

Comment: The policy will leave much to be determined at the LDD level, we perhaps, should be concerned as to how and in what form assisting the viability of agriculture and the rural economy will be taken forward through LDDs.

5.15. The London-Stansted-Cambridge-Peterborough Growth Area is dismissed as having 'little coherence in functional, geographical or economic terms'. Also it is seen as unhelpful in focussing the search for growth options on a small number of districts when others also have growth aspirations. Suggestion being that other areas also

need to be able to access the same support (which has been offered to growth areas) where they are taking significant growth. The view is that to deliver a step change, the response needs to be region-wide.

- 5.16. Stansted/A120 corridor towns are excluded and regarded as not suitable for strategically significant scale growth. But the Panel have included Thetford, Hatfield/Welwyn Garden City and Hemel Hempstead and Stevenage New Towns.
- 5.17. The Panel supports the general approach of urban concentration (para4.15) but, leaves detailed distribution to LDDs. 'Provided that urban concentration must be maintained'. Also therefore it deleted a number of references to smaller towns in the Plan.
- 5.18. It seems the Panel did not see the suggestions for smaller new settlements (5,000) as high enough up the scale of sustainability to warrant inclusion

Comment: does this mean any settlements below this size are considered unsustainable?).

- 5.19. It leaves the issue of need for larger settlements to a review of the Plan and sees this as the next logical step.
- 5.20. The Report has moved the (now called) City and Market towns policy to be next to the key centres policy as a guide to LDDs. This version, now SS6, is amended slightly and now includes mention of *'build upon elements of its distinctive character'*.
- 5.21. Green Belt is covered in para 4.23 p23 and in the recommendations R4.7 (p33) and indicates where strategic reviews are called for:
- Stevenage (land in Stevenage and North Herts and compensatory extension)
 - Hemel Hempstead (land in Dacorum and St Albans)
 - Harlow (land in Harlow and Epping Forest District)
 - Welwyn/Hatfield
 - Luton/Dunstable/Houghton Regis (compensatory GB in South beds and North Herts)
 - Broxbourne (Upper Lee valley)

No review in Cambridge.

Many of these reviews will need Local Authorities to produce complementary co-ordinated strategies.

- 5.22. The Panel report supports compensatory GB in relation to Luton/ Dunstable/ Houghton Regis area. There is in fact little scope for compensatory Green Belt in either South Beds or North Herts, as these two Districts are nearly covered by GB already outside their urban areas. Mid Beds is hoping for some compensatory GB from the review around Dunstable and Houghton Regis which is being consulted on at this time.
- 5.23. The report discusses compensatory Green Belt and the concerns to how this could be done, when the area is not within the same boundary of the LPA making the release, they go on in the SS7 to require LPAs to prepare coordinated and complimentary strategies.
- 5.24. SS16 Quality in the built environment has been added to with these points:

- emphasising that it must complement the distinctive character and best qualities of the local area or (in areas identified by LDDS as requiring a new preferred townscape/landscape character) assist the necessary process of transition
- assist urban renaissance and regeneration where appropriate
- Provides landmark buildings of an appropriate scale.

5.25. The Panel makes some minor wording changes to other SS policies (SS8, SS11, SS15), one of which is to take out the word “balance” in SS9 the coast policy, and replace it with “integrate”, something we argued for. The words ‘conservation of the coastal environment ...tranquillity of undeveloped areas’ (was SS15) has been retained. This policy is slightly reworded and in fact states at the end where creation of new mudflats and managed retreat is outlined, that development will not be permitted. This is much stronger wording than the original.

6. Chapter 5 Sub-regions

NB The quote directly from the report sums up very well the view on sub-regions

6.1. *‘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’.*

6.2. The report goes on to say that *‘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.’*

6.3. Apart from 4 sub regions, the Panel proposes a number of changes replacing the terms ‘sub region’ and ‘sub area’. Some of the towns have been refocused as Key Centres for Development and Change (KCDC) these being Norwich, Thetford, Peterborough, Stevenage, Bury St Edmunds and King’s Lynn.

6.4. What are regarded as ‘genuine sub-regions requiring a broader area wide approach’ are: Thames Gateway, Haven Gateway, Cambridge and the London Arc. However they rename the TG as Essex TG and limit its scope to the TG growth area and Rochford minus the airport.

6.5. Essex Thames Gateway

6.6. The Panel has attempted to simplify the language and give separate policies for the three key centres, stressing re-use of brownfield, urban renaissance and establishment of integrated public transport linking all nodes in South Essex. The site specifics have been removed, and these are left to LDDs to determine.

6.7. The Panel report indicates that no review of Green Belt is considered necessary, and points out that the potential for re-use of PDL was one of the main reasons for choosing this area as a growth area in this area and around Southend airport and it should be up to LDDs to determine locations. Particular importance was given to maintaining open spaces due to high density of development in area (5.11).

6.8. The Panel sees that aspiration for jobs should be fulfilled, but includes only a single employment target for whole Plan period and points out that it may be hard to achieve in the early years. On Lakeside it emphasises – no further retail expansion but supports further other development including housing in the Lakeside basin. It does not support classifying it a regional centre and suggests that the sequential test would throw up the other towns in preference.

6.9. Haven Gateway

6.10. The Panel report suggests that the Haven gateway forms a coherent sub region. The Panel sees splitting of districts for housing as unnecessarily complex, and says that precise boundaries are for monitoring purposes only. It has taken on board concerns about protection of Dedham Vale and other areas but considers that the strengthened ENV1 addresses this. The Panel does agree that the growth targets are challenging and will depend on interventions including key infrastructure. Jobs targets are there for monitoring purposes only. As with other areas, detailed locations are to be left to LDDs.

6.11. On the development of Ipswich, where there is a danger of coalescence of villages, the Panel suggests that development can be met without doing so and that it must be well related to the existing urban area. Babergh is being asked to take 600 houses for Ipswich's needs and this is separate from Babergh provision. The Panel emphasises that 'homes should be located as close as practicable to the relevant employment' (5.30). The Report says that housing provided in extensions to Ipswich should function as part of the town and not for commuting to Felixstowe.

6.12. On the Essex side the Panel sees the jobs targets as no more challenging than anywhere else and that they should improve alignment. There is a hint here that Marks Tey may be looked on via the review as a location for further development beyond 2011.

6.13. The Panel makes the point that improvements to reduce congestion on strategic roads need to be managed to 'avoid inducing additional traffic growth' (5.34).

Comment :Interesting to see how this could be achieved?

6.14. The Panel report discusses the role of the Haven Gateway Partnership, which we suggested should be open and democratically accountable. The Panel raises the issue of the process being decisive but not circumventing the formal LDD process and its provision for community involvement. It also mentions SEA requirements (5.36).

6.15. Norwich sub-region

6.16. Norwich Policy Area which is what the Panel has left out of the Norwich sub-region. The Panel has deleted the LPA figures from this as they must be done at LDD level. This resulted in the removal of policies NSR 1-6 and KL 1-4. The towns are now designated as a Key Centre for Development and Change (KCDC). Norwich stays as

the current Greater Norwich area, i.e. the Norwich Policy Area (NPA), which includes part of Broadland and South Norfolk, instead of half the County, or in the King's Lynn case, straddling 5 LAs.

6.17. The Report points out that Northern Distributor Route (partial route) needs to have 'appropriate assessment' under the Habitats Directive. However, it does see it as forming part of the package of measures required in the NPA.

6.18. Norfolk dwelling provision total moved up from 72,600 in the draft Plan to 78,700, an increase of 6,100. The Panel breakdown by district for Norfolk is 15,200 Breckland; 12,200 Broadland; 6,000 Great Yarmouth; 12,000 King's Lynn and West Norfolk; 8,000 North Norfolk; and 11,200 South Norfolk.

6.19. Great Yarmouth/Lowestoft sub-region

6.20. We supported the focus on regeneration although we considered there were dangers to the environment by excess housing. The Panel came out against the '*spuriously precise*' housing figure and leaves much to be determined by LDDs. The Panel makes it clear that it is not favouring one option or other regarding the Acle Straight. This sub-region was deleted and the policies were included in the Key Centres Policy.

6.21. Norfolk and Suffolk Broads sub-area – deleted.

6.22. Thetford sub-area – deleted and put into key centres policy. The Panel viewed this town as having scope for taking more housing 'to provide a larger customer base to enable a qualitative renaissance and compete more effectively'.

6.23. Greater Peterborough sub-region

6.24. This area is not seen as requiring a separate strategy. The Panel accepts the LA arguments for higher figures in the Plan. The Report increases employment and housing figures by 20,000 and by 25,000 respectively. The Panel point out that achieving these figures will require investment for necessary infrastructure and there are some flooding issues and the need to conserve important landscapes and environmental assets.

6.25. A review of the potential of Peterborough post-2021 is recommended. The Panel increased the housing for Fenland to 11,000. The Panel also makes the point that implementation will need care to ensure development supports the local economy and does not extend commuting.

6.26. Cambridge sub-region

6.27. The Panel has taken the view that it is more sustainable to allow the Market towns in the Sub region to become more self sustaining rather than being dormitories for Cambridge. The towns of Royston and Saffron Walden and the Suffolk Towns of Haverhill and Newmarket are also removed from the CSR and the Panel saw their inclusion as going back to the dispersal option which the structure plan had moved away from. Looking beyond 2021, the Panel is leaving to the review, however, it cites some areas where further growth may be feasible, such as: Huntingdon, Northstowe, Cambourne, expansion of settlements along the line of the guided bus, and an expanded settlement somewhere south of Cambridge associated with the railway/or extensions to the guided bus.(5.69)

- 6.28. The Panel has taken out the development quantities and included the gist of the Cambridge Sub Region vision.
- 6.29. Alconbury airfield runway is taken out of the frame for protection and any other development consideration is being once again left to the review. Review of the Green Belt is not recommended until a review of the Plan.
- 6.30. The target figure for housing has gone up from 14,700 to 19,000 (an increase of 4,300) for Cambridge. However, South Cambs, East Cambs and Huntingdon figures are unchanged. Significant changes to other district figures:
- Fenland 900
 - Peterborough 3,500

6.31. **Stansted/M11 sub-region**

- 6.32. The Panel sees no need for this sub-region, or to put growth close to Stansted, but supports the focus on Harlow for regeneration. Therefore it deletes all the policies for this sub-region and replaces them with just one for Harlow as a Key Centre for Development and Change. The Panel Report goes into why it excluded North Weald and Harlow North and agreed with our line that this would be a separate town and would not support regeneration in Harlow as would North Weald where other places would be more of an attraction to residents rather than Harlow. Also the Panel notes that the issue of water and waste is at present unresolved for those areas.
- 6.33. The A120 corridor is discarded as an area for growth, and the Panel sees the planned level for growth as handling any requirements of an expanded Stansted airport already.
- 6.34. Bishops Stortford is removed from the policy SS7 as a strategic location for growth, and East Herts housing figure has in reality gone up though it appears to have been reduced overall from the original figure of 20,800 to 12,000 but 10,000 of that is due to the removal of Harlow North so should be 10,800 for the rest therefore this is an increase by 1,200 for the rest of East Herts.
- 6.35. The review of Green Belt proposed for Bishops Stortford, appears to have disappeared. And the Panel has left determination of location of development in the Uttlesford and the Braintree district to LDDs.

6.36. **Stevenage sub-area**

- 6.37. The Panel recommends that growth should be in the town which is designated as a KCDC, but that there will be a need for 'substantial *green field sites*' (5.115). The overall housing growth proposed is for 14,400 (this includes 8,000 outside Stevenage boundary in North Herts) dwellings within and on edge of built-up area by 2021 – urban extensions to west and north, including at least 5,000 at Stevenage West. The Panel also recommends a strategic review of Green Belt to establish new defensible boundaries allowing scope for continued growth of Stevenage beyond 2021.

Comment: This probably means more land taken from the greenbelt first!

- 6.38. On the issue of jobs, the Panel treats jobs target only as indicative. There is some discussion about alignment and the fact that Stevenage has net in- commuting is

used to emphasise that all the parties involved will need to deliver growth in such a way to maintain this and not become exporters of labour.

6.39. London Arc

6.40. In the report this area is broken into two, East and West, the second being mainly Herts the other Essex. The designation of the Arc as a sub area is in part recognition of the impact of London on the region and our submission outlined that the Plan had not given the area enough consideration. The Panel also picked up the point which we made about clarity and the fact that the area was covered by more than one sub-region causing some confusion.

6.41. The most significant change is the level of housing increase which has been added across almost every district and the inclusion of the Mark 1 New Towns Hemel Hempstead, Welwyn Garden City and Hatfield as Key Service Centres for Development and Change. The impact of the Herts of the 13,000 or so extra houses will not have been considered by the SEA or the SA.

6.42. Dacorum

6.43. In the Dacorum District there is a significant increase from the Plan figure of 6,300 to 12,000 which is predominantly around Hemel, The Panel recommends a strategic Green Belt review to be undertaken around Hemel Hempstead to allow for 4,900 dwellings in addition to the 7,100 that can be accommodated on non-Green Belt land. A large proportion of this 4,900 to be built east of Hemel Hempstead (mainly on land owned by Crown Estates) towards the M1, the land is Green Belt and in St Albans District. Some additional employment-related development is also envisaged, but is not quantified

6.44. Welwyn/Hatfield

6.45. Welwyn/Hatfield, also designated as KCDCs, are given an extra 4,200 houses. This, it is suggested, will require Green Belt land and the Panel recommends a Green Belt review for Welwyn/Hatfield as part of LDD process. Two potential locations for this growth are indicated – a safeguarded Area of Special Restraint excluded from the Green Belt on the east side of Welwyn Garden City (i.e. Panshanger Aerodrome) and additional mixed development at the former Hatfield Aerodrome site (land owned by Arlington Securities).

6.46. Watford has also had an increase of 600 to its housing to bringing it up to 5,200.

6.47. On the eastern part the Panel have chosen to remove Chelmsford from the Arc and it is designated as a KCDC, Braintree and Maldon to be covered by the general policies and that leaves Brentwood and Epping Forest to be retained in the Arc designation. Epping Forest has had an increase in housing target to 3,500 an increase of 800.

6.48. Broxbourne gets little mention other than an increase of housing by 500.

6.49. Brentwood has also been increase to 3,500 an increase of 600, the Panel points out that Crossrail may bring development pressures to this area.

6.50. Maldon remains unchanged (in figures that is)

6.51. In total the housing target increase for the London Arc is 14,600.

6.52. Chelmsford

6.53. The Panel sees an increased role for Chelmsford and does not rule out a strategic review of the Green Belt as an option for LDDs. It also increases Chelmsford's housing by 2000.

6.54. Bedford and Luton Growth areas (part of MKSM sub-region)

6.55. Much of the discussion of this area was about its relationship to the MKSM strategy and if the Beds part should be incorporated into the Plan, the Panel does not see a need for this, but recommends that the Plan needs to address the longer term view (as the MKSM strategy does) at the review. Other issues are the need for compensating Green Belt and the needs to review employment figures in MKSM. The Panel has reconciled the different dwellings figures by simply changing the Plan one to match the MKSM one. Emphasis is on alignment (jobs & housing) and the jobs figure being for monitoring only.

6.56. Regarding housing figures, it has rounded the figure for the villages outside the Growth area has also increased the figure for Mid Beds to 11,000 (up by 2,730). South Beds gets a reduction to 1000 a drop of 600. It has also removed the material on Luton from the Plan, and the discussion of Marston Vale waste issues is now within the Waste Chapter.

6.57. Bury St Edmunds

6.58. The Panel makes it clear that large developments on the outskirts of Bury will lead to out commuting and not be good for the aim of reducing traffic or to enable Bury to grow sustainably. It has increased the housing by 2,000 to 10,000. Of interest are the comments on 'Regional scale leisure facility' (Snoasis). The Panel considers the new settlement is not in keeping with sustainability principles in the Plan and its impact on water and reliance on car borne transport, and therefore it does not up the figures in Forest Heath.

6.59. Kings Lynn sub-region

6.60. The Panel doesn't see a need for any specific policies other than as a KCDC the rest is being left to LDDs to determine. It was not convinced that flooding was a particular constraint, and increased the housing to 12,000, an increase of 1,000.

7. Chapter 6 Economy

7.1. The Panel goes into a discourse on jobs figure derivation very similar to our discussion in our response. Indeed the Panel suggests that '*process lacking real transparency*' (6.4) which we would agree with. It also comes to the conclusion that the target figures were inadequate, given the data manipulation behind the targets. The report states that the increase in share of national employment of the jobs forecast 421,500 to 2021 is 8% up to 9.3% I. The Panel has increased them to match housing to 440,000 broadly same ratio (slightly fewer jobs).

7.2. But the Report also emphasises that the targets are no more than general indications that agencies need to strive for to get sustainable communities and the report

cautions about giving too much weight to the figures querying how they can be translated at the Local Level. Main use though for monitoring purposes.

- 7.3. Main recommendations the Panel suggests are to reinforce alignment. Increased housing numbers in areas where job surplus and reduced where surplus of workers (Stansted/M11) para (6.12).. Recognised impact of London and recommended more development in those areas which can address this need and are well connected in this respect (New Towns).
- 7.4. Agrees that planning system has little influence over employment. The Panel has reduced/increased where housing figures have been changed.
- 7.5. Policy E3 has been revamped and is an attempt to emphasise the need to address ODPM good practice guide. The wording was changed to state 'needs of wider economy' rather than business?
- 7.6. There is a call for regional methodology for employment land reviews and EERA is seen as having a central role in this, but really no other in how LAs determine employment land reviews. This is treated in E4 - on Strategic Employment Locations, the Report once again leaves much to LDDs to determine strategic locations.
- 7.7. Deleted E5, 6, 8 and 11. E9 and 10 are amalgamated and there is some discussion about ranking of towns and the Panel changes the terms used to that of 'regional centre' and 'major town centre' (6.25).
- 7.8. The issue of Lakeside has become the subject of a new policy ETG2 (R5.2).
- 7.9. E12 is amended to meet PPS6 requirements and E13 has been improved to recognise the fact that much tourism is based on our environmental assets including host communities. This could be an important criterion for preventing poor development.
- 7.10. E14. The region's airports policy has been strengthened on the environmental side and refers to earlier policies on sustainability also that employment not associated with the airport operations and housing development related to employment at the airport will be located at Harlow and nearby towns. Does this really mean no commuting?

8. Chapter 7 Housing

- 8.1. This chapter of course is rather disappointing in that **the Panel has increased the housing target to 505,500. The figures are seen as maximum that the region can achieve** (message to Government) (7.13) to 2011, and beyond that it is considered unrealistic to propose a figure and there is talk of the need to consider new settlements post-2021 and the Panel suggests there is capacity to provide additional development but *'only if sustainable solutions can be found for key issues to do with water supply, wastewater and transport'* (7.32).
- 8.2. There is quite a discourse on derivation of figures and background to the Plan's projections, and also on the underlying variables which influence those projections which we recognise as they were also our arguments. The Panel states that in its opinion the ODPM 2003-based figure does not provide a firm basis for re-wording the regional housing provisions in the Plan (7.10). But it concludes that 478,000 is too low and that 505,000 would address the needs of the region. In effect it did not take

notice of new household projections except that demographic pressure may be greater than thought (7.11).

8.3. Of note is that the Panel agrees with the perception that house builders are unlikely to build to reduce house prices, however, it says that the converse also applies, in that not producing enough housing will widen affordability gap.

8.4. States that it *'is unrealistic to expect that public funding or developer contributions will in future subsidise the housing needs of an ever increasing proportion of the regions people because they can't afford to enter the market'* (7.16).

8.5. The Panel agrees the point that simply increasing the housing target would do nothing to accelerate housing delivery therefore the Panel sees phasing as important, but also that the Plan is unclear as to how this is to be achieved in the period after 2021.

8.6. The Panel draws the conclusion that the Plan needs to address housing supply but that there is no way of determining an *'appropriate market figure'* (7.18) for the region. It makes it clear that in effect there is no upper limit since environmental and infrastructure constraints will dictate something lower and that they have strengthened some ENV policies in this light (7.27 and 7.28).

Comment: However, LPAs and Inspectors cannot be relied on to refuse permissions on environmental limit grounds. Also, some environmental capacity issues are sub-regional, and may also be regional in nature, and so beyond the scope of LPA.

8.7. On delivery and relationship to economy the Report suggests that the nature of challenge varies with location (7.24) and in some places economic constraints *'may form permanent limits to the amount of growth that can occur'*. How is this readily accepted yet environmental limits are not? But there again ***'the water environment discussion identifies a potential case of environmental limits, which also affects timing and location of growth as much as overall level'*** (7.26). We would agree with that.

8.8. An interesting point on climate change is that houses only accommodate people and if not here human activity will take place somewhere (7.27).

Comment: We would put two arguments against this. The amount of energy and resources used is related to the number of households and not just individuals, the more single homes the greater resource use, as two or more people living together use less per capita. Secondly, to reduce the impact of people, it is better to locate houses in centres such as London where the mature infrastructure already exists to be able to handle increases in population, and also to reduce commuting. This could apply to other metropolitan areas also i.e. big cities are more sustainable in those terms.

8.9. *'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'* (7.27) p119.

8.10. However the Panel does make it clear that the question of numbers cannot be determined by projections and capacity of industry, but these issues need to be considered alongside environmental issues as well and all need consideration at the local level: *'neither general economic factors nor capacity of the industry provide a basis for determining a specific regional housing total'* (7.25).

- 8.11. Agrees that it is an important aim of sustainability that jobs and homes are steered to locations where these are aligned to achieve more sustainable travel.
- 8.12. The Panel recommends an indicative phasing of 5 years. The figures in the phasing chart for each district are regarded as indicative for monitoring purposes and precise trajectories should be at LDD level. The tables suggest even rates of development across all years. The figures are not maximum unless there are environmental limits/infrastructure constraints.
- 8.13. Policy H1 is the set of tables of provision and indicative phasing numbers. H2 is the policy on phasing and includes the need to take account of local needs assessments and co-ordination of work between authorities. H3 is now the affordable housing policy which has no targets except that LDDs should set appropriate targets and at the regional level *'an expectation that some 35% of new housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable'* (p134).
- 8.14. The Panel has dropped the 'in perpetuity' part of the affordable housing policy relating to rural housing.

Comment: this wording was in the original Draft Plan to address the losses driven by the right to buy process and the continuing loss of stock.

9. Chapter 8 Transport

- 9.1. Demand management, reducing the need to travel, improved accessibility all with a reduced impact on the environment, are the key messages coming from the report .
- 9.2. The Panel has totally revised the set of policies which now address the objectives of the Strategy in a far more holistic way and include climate change and reducing the transport intensity of economic activity, including a policy on changing travel in the East of England (T2 p145) and managing traffic demand.
- 9.3. Focus includes environment and minimum accessibility levels, and a key addition to the airports policy – *'a key priority to ensure airport access facilities reinforce and help contribute to the shift to more sustainable travel'* (T12 p148).
- 9.4. The Panel has taken on board the need to address climate change and goes on to say *'that T14 and 15 are not sufficient to convey the prominence the RTS needs for bringing about major change in travel behaviour'* and whilst not saying directly does not appear to support the notion of infrastructure deficit – simple problem of congestion: 'people will have to use cars less in future'. It also points out that the background increase of 45% in traffic on strategic routes is incompatible with national aims of reducing carbon emissions (8.8).
- 9.5. The Report expresses the need to focus on outcomes rather than schemes, and throws out the tables of schemes, pointing out that the transport priorities and policies need to be more aligned with spatial strategy and that there should be focussed targets (8.5).
- 9.6. We called for strengthened policy on demand management and we have got it: the thrust of the report is on emphasising reducing demand, traffic growth and environmental impact.

- 9.7. The report focuses on the three spatial types of transport requirements in urban, peri-urban and rural. The Panel covers rural more fully than the original and the Report emphasises support for public transport where viable, to meet and where possible exceed the minimum accessibility levels in T13.
- 9.8. The Panel obviously does not see new rail as a possibility in the timeframe (if at all), and makes it clear that concentration of development can be supported by rail but only on existing radial routes. Beds to Cambs section of East-West route for rail considered problematic, so unfortunately the route is not safeguarded (NB A recent planning application for rowing lakes has been granted on this route following publication of the report and on the strength of this). Points out the need to balance remedying problems in the network (roads) and avoiding encouraging unsustainable traffic growth (8.20).
- 9.9. As per the usual pattern the location of a possible Freight Interchange Centre is not suggested in the Plan. Through policy changes, the Report emphasises the need to move freight from ports to rail.
- 9.10. As already mentioned the Panel removed table of schemes, saying schemes should only be identified where there was a clear commitment to deliver. It also pointed out that it was not in a position to pass judgment on schemes or the economic and environmental impact of them. What is recommended, is the setting out of schemes currently approved and prioritised through the various funding regimes with indicative costs and any other funding sources.

10. Chapter 9 Environment, water, renewable energy

- 10.1. The Panel report brings considerations of environmental issues right into the heart of the Plan, giving them a more central place by inserting them after the spatial strategy chapter. The Panel also addresses climate change, the need for green infrastructure and protection of what we have.
- 10.2. The environment chapter is now called environment, water, renewable energy. This in itself suggests the importance these issues carry for the delivery of the Plan. The Panel has picked up the difference between green and environmental infrastructure which we set out in our statement. They also agreed on the need to 'protect' the green infrastructure in its widest sense throughout the region' (p149) 9.3.
- 10.3. *'Should be valued mainly for its contribution to "quality of life" in the broadest sense'!* (9.4)
- 10.4. New strengthened policy on Green Infrastructure, which recommends that the first environmental policy of the RSS (ENV1) should be revised to state that networks of green infrastructure **will be protected, created, extended, enhanced, managed and maintained throughout the region** goes on to say that this will be particularly important in areas of high growth (but not necessarily restricted to Growth Areas), and that LDDs will **'identify and require the retention and provision of substantial networks of green space'**.
- 10.5. ENV1 lists the environmental assets of regional significance in full and in those include the Brecks.
- 10.6. In amending policy ENV2, now called **Landscape Conservation**, the Panel picked up our point about statutory duty and has elaborated what this means for each type of protected area. Otherwise the policy is unchanged.

10.7. In the Policy ENV3 the Panel has picked up a number of our points especially the move of the final point to the top of the list and the addition of 'avoiding harm to county wildlife sites'. There is also an emphasis on net gain from development.

10.8. The Policy on woodland is also much improved and addresses the concern about woodland being in some places inappropriate. Also the ENV5 Historic Environment has been strengthened and includes certain village types, and the words the '**the rural landscapes of the region**' (p162).

10.9. Energy

10.10. There are positives and negatives around the Panel's treatment of energy. The Panel has accepted the arguments to separate out energy efficiency from renewable energy. By setting out two new policies, unfortunately the target for 10% of energy coming from renewable on developments above a certain size has been removed. This may be due to it being national policy now and covered by PPS22 (which enables LPAs to include such a clause). This has recently been reinforced by the Ministerial statement of 8.6.06 which stated that Government expects all planning authorities to include such a policy requirement.

10.11. Appendix C has also been dropped. Instead, the Panel sets out the further work on locational criteria that EERA needs to do (9.26), and this will await a review. The report sets targets for 2010 and 2020 in terms of electricity generated by renewable energy, i.e. all sources of renewable energy, and not specific on wind.

10.12. The Panel sets out the line of efficiency in ENV9 (p162).

10.13. Water

10.14. On the issue of water efficiency, the Panel calls for targets on water to effect savings of 25% compared with 2006 levels, and at least 8% in existing build.

10.15. The Panel has some important points to make on water resource and efficiency in paragraphs 9.39, 9.40, 9.41 and 9.42 at pages 156, 157. These deal particularly on the relationship and powers of LAs and the Environment Agency, and implementation of objectives.

Comment: With the cuts in budget for the EA (along with NE) will there be the resources to do extra work on these issues?

10.16. There are four new policies dealing with Water Efficiency; Water Resource Development; Integrated Water Cycle Studies; and Planning for Water Resources and Waste Water.

10.17. This last one, ENVxxx 'Planning for Water Resources and Waste Water' (p163), states that *'LDD will plan to site new development so as to maximise the potential of existing water/waste water treatment 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!*

Comment: There should also be sustainability criteria for locating schemes which should influence location, including minimising travel. They may not coincide with locations which maximise existing water infrastructure.

11. Chapter 10 Waste

- 11.1. Much of the waste section is still being determined by work being done on apportionment by EERA. The WM1 objectives are much better than the original and talk of reducing the environmental impact which may be useful to us. The Panel also talks about communities taking more responsibility for their own waste.
- 11.2. There is quite a lot of discussion of the issues surrounding Marston Vale and the likely impact for waste planning of the removal of that facility which is why the Panel has gone for a reduction of the levels of disposal over time. With the new policy WM8 to address this area 'use of landfill capacity in Marston Vale should provide for reducing tonnage over time, and should be limited so as not to compromise objectives for environmental regeneration...' (p171).
- 11.3. The status of the RWMS is still a little unclear it appears that certain parts are to be included in the Plan but the non-land use aspects are not.

12. Chapter 11 Implementation

- 12.1. The Panel regards the Plan as being 'far too long' and suggests removal of much of the supporting text. The Panel also points out that there are areas that need to be covered and are not.
- 12.2. It recommends that the Key diagram should be enlarged to at least A4, should show the Key Centres for Change and Development (KCCD) and should indicate the different scales of growth, Retail Status, regional transport nodes, strategic employment locations and priority areas for regeneration. It should also show the extent of the Green Belt and showing locations of Green Belt reviews. The Panel also recommends showing the key strategic items of green infrastructure.
- 12.3. The Panel did not like inset maps as it suggested that differences creep in. It is also against having different maps for strategic and regional transport, and suggests a need to include an indication on maps of key priorities for investment on strategic rail and highway networks.
- 12.4. The Panel goes into some depth on the issue of 'lack of confidence' regarding funding for infrastructure. However it saw the IMP2 policy as impractical due to the difficulties of determining dependencies between the different elements (jobs/housing/infrastructure). It said that at the site level this is possible, but it was disappointing that the proposed New IMP2 policy which included a degree of conditionality (on infrastructure provision including environmental and green) did not survive the Panel's ruminations.
- 12.5. We have also lost the part of IMP2 which covered planning agreements although it may be that the Panel is assuming that the national guidelines on negotiations of agreements, which we heard at the EiP was coming, would cover this.
- 12.6. But, the Panel examined what it regarded as the 'fundamental issue of how to ensure that the principles of sustainable, communities ... are enacted when development is delivered' (11.13). Basically ensuring delivery of infrastructure with housing and within the redrafted IMP1 talk about identifying any 'critical infrastructure and service milestones'.

- 12.7. The Panel recommended a high level implementation strategy prepared by a regional co-ordinating body and mentioned the Regional Partnership group. It did pick up our concerns that this is a group meeting in private! There is support from the Panel for LDVs of some sort picked locally, which the emphasis on picked locally is positive and may deliver some democratic oversight.
- 12.8. On the TG and the need not to add to the bureaucracy the Panel suggested keeping it separate.
- 12.9. To pick some of these issues up the policy IMP1 has been redrafted. The final IMP3 is the requirement for a review to look at new settlements and other spatial options
- 12.10.** On the Targets and Indicators the Panel wants a limited number of SMART indicators relating directly to RSS policy, and also the need to monitor water and energy savings, road traffic, public transport use. Employment targets and the need for monitoring were also considered. The Panel asked the question '*what exactly is and are knowledge-based and employment cluster development*' (11.26).
- 12.11. **Of particular interest** is the recommendation that monitoring of affordable housing needs to include the number/percentages of units coming through new planning permissions to indicate if planning decisions are bringing about RSS targets. Also whether they are through 'mainstream' or special powers in rural areas' (exception sites?) (11.26). Another key element is the requirement to monitor 'delivery of environmental and other objectives in particular water consumption and emissions' (IMP2).