

Draft 10 response to RSS14 consultation draft – East of England Plan 14/3/05

Overview

There are a number of very good policies within the plan which we welcome. In particular the vision (3.2) this, is inspiring and should represent the aspirations of the majority of people in the region. Policies to address the provision of well-designed energy and water efficient housing, use of previously developed sites, serious attempts to limit or even reduce the impact of road-based transport, localisation of employment and services and protection of environment and finite resources are to be welcomed also the spatial policy of concentrating development in existing urban areas, encouraging the highest possible design quality within these developments and respecting the different facets of regional character all are a positive approach. We also welcome the emphasis on regeneration throughout the document.

However, there are some major failings within the draft Strategy which will doom the good policies and the need to pursue sustainability, to failure at the outset

1. We believe that the level of growth proposed may make the realisation of the vision unachievable.
2. The Plan fails to acknowledge the real implications of sustainable development
3. Failure to fully address the climate change implications especially on the issue of water availability and flood plain development.
4. There is an ambiguity of purpose.
5. Tensions within the Regional Transport Strategy are apparent throughout the document and are not addressed
6. Failure to recognise that rural areas may need different treatment and specific policy to address needs.
7. Inadequate mechanisms for monitoring

1. CPRE fundamentally believes that to pursue the proposed strategy of growth of accommodating an additional half a million homes at the same time expand the economy with all the attendant infrastructure in the East of England will be to the net detriment of the environment. Whilst the Plan seeks to ensure that the environmental assets of the region are 'used prudently' it *does not* acknowledge that at some point **any further use becomes inherently unsustainable**. Therefore it is contrary to its statutory purpose as set out within PPS 1 (2005) - to contribute to the achievement of sustainable development.

The level of jobs and housing development proposed, especially in the growth areas, will inevitably lead to the expansion of settlements in such a way that will lead to urban sprawl across swathes of our region. The Green Belt will be rolled back in places so that its purpose will be undermined and the landscape setting of towns lost. In particular we would cite the loss of open countryside, valued landscapes and grade one agricultural land as well as the impact that the inevitable urbanization will have on the landscape character, the diversity and character of the settlements, biodiversity, natural resources, tranquillity and the quality of life.

2. The approach adopted throughout the body of the plan - to mitigate the environmental effects of the unprecedented levels of growth proposed, is considered to be perverse. Mitigation only ever tries to hide or reduce the harmful effects or impact of a development it never can fully compensate for it and some environmental damage can never be compensated for. The strategy fails to reflect at all that there is a fundamental need to develop within the environmental **capacity** of the region in order to be sustainable; this must be the **starting point**. Throughout the Plan the protection of the environment appears to be an afterthought and is placed at the end of all lists and criteria. It is not acknowledged in a sufficiently robust way that much of the regions environment is of such quality and sensitivity that it may not be able to accommodate development of any scale.

The document does not address the essential unsustainability of current conceptions of economic growth,

"Gross Value Added per head is not an adequate indicator for this Public Service Agreement target. We

recommend that regional prosperity should instead be measured by a basket of indicators. This would explicitly take account of the range of factors that determine regional prosperity, using different indicators for each—productivity, disposable income, employment and unemployment. Quality of life should also be taken into account. The Secretary of State for Trade and Industry's proposal of a balanced scorecard approach should be taken forward. Using a basket of indicators, each derived from a different source, also reduces the risk of relying on a single source of poor quality data. We recommend that ODPM, DTI and the Treasury consider the regional performance indicators to measure quality of life set out in Regional Quality of Life Counts as a potential basis for improving the measurement of performance against this target. (Para 36, Select Committee of Office of Deputy Prime Minister: Housing, Planning, Local Government and the Regions Ninth Report on Reducing Regional Disparities).

The Plan assumes that both employment growth and housing growth are essential and unchallengeable and clearly states the Plan is jobs led, however, it is based on a number of additional jobs that “need to be created” and for apparently sustainability reasons these jobs need to be balanced by a number of houses, This issue of balance are of considerable importance in that the Spatial Strategy which forms the core thrust and direction of the Plan has been developed so as to ***‘provide the best balance between the objectives taken as a whole’*** (paragraph 3.4). In achieving a *balance* the implication is that there will be some winners and some losers when making strategic or local development decisions. It infers that to achieve some of the objectives, others may have to be compromised and value judgments taken as to how a balance is best reached we would contend that, in principle it is better to aspire towards ***‘net gain’*** solutions, whereby any unavoidable losses (whether environmental, economic or social) are at least neutralized, and preferably reversed through compensatory development so as to secure overall *net gains* through all significant development. This is the basis of sustainable development.

3. At the same time the Plan fails to address climate change adequately and the likely significant impact on water resources given that the balance between water supply and demand is at the limits of sustainability in some parts of the region, whilst flood risk is likely to become even more of an issue as climate change impacts upon the region in ways which will perhaps be more evident than any other area within England, it is worrying therefore that policies of avoiding flood-plain development and of sea defence strategies, are generally weak, development on flood plains can it seems as far as the plan is concerned apparently continue with minimal checks.

PPG25 para 23, states that *“In these functional flood plains, the Government considers that built development should be wholly exceptional and limited to essential transport and utilities infrastructure that has to be there.”*

The SEA report recognises that *before* the emerging plan strategy is even delivered there are notable and varied pressures on the regional environment, particularly in terms of water supply and resources, flood risk, landscape character erosion, habitat loss and fragmentation, pressure on the historic built environment from insensitive development, unsustainable impacts of travel patterns, and degradation of tranquil areas. These represent only a sample of the total number of issues identified. As it stands the Plan itself will lead to further contributing to climate change. Harm to the environmental quality of the region is not compatible with improvements to quality of life for its communities or visitors, and will at some point be reflected by negative impacts on economic stability.

What may potentially be the most serious limiting factor to the whole Plan, the question of water supply, receives surprisingly little attention. Given that water extraction is already unsustainable over almost half the region, and likely to get worse with climate change, the omission of serious contemplation of water shortage is extremely difficult to justify.

4. Within the objectives of the plan (as the S.A report pointed out) there is an “ambiguity of purpose”: The report suggests that The Plan appears to be trying to fulfil two objectives *“enable housing to catch up with jobs to address problems of shortage, affordability and commuting or to develop balanced communities with jobs and housing broadly in balance”*. The report goes on to point out that ***the same housing cannot do both*** and if RSS14 achieves balanced communities it will not redress existing housing shortages and therefore government could seek yet more growth *“a policy vicious circle”*. ((p63 Final Draft S.A October 2004)

At no point is there any analysis of the broader picture of the need for jobs across the UK or of the mechanisms whereby jobs will be created. Even more worryingly it is recognized in the Regional Planning Panel Paper (Feb 28th) that the mechanism for monitoring jobs creation doesn't really exist as yet but housing figures in the Plan are based on a proposed increased number of jobs of some 24%.

Although the strategy is supposed to be one of plan-monitor-manage, there is no convincing discussion of the way that this will be implemented. There seems to be no way of dealing with the potentially damaging impacts of excessive growth, other than "to review the plan". Nor, for that matter, does there seem to be any consideration of what should be done if it becomes clear that all or any of the more enlightened policy targets are not being met.

5. There are major unresolved tensions within the Transport Strategy section. On the one hand, the Plan advocates multimodality, encouraging walking/cycling and improving public transport including rail and we welcome this as a step towards sustainable transport solutions.

However, the good policies are totally undermined by other policies. For example : T1 includes objectives to:- Enable infrastructure programmes and transport service provision to support both existing development (addressing problems of congestion) and that proposed in the spatial strategy (economic regeneration needs and further housing growth) The majority of the detail schemes table 8.3 cited involve continued improvement and expansion of road links and the Plan appears wedded to the notion (discredited by the SA report) that the region has an infrastructure deficit. The majority of investment priorities to address this "deficit" are strategic road routes which will do more to encourage commuting rather than reducing it, roads can induce traffic (see SACTRA report) This appears inconsistent with the need to reduce the need to travel and minimize the impacts of travel on the environment

It will do nothing to address regeneration needs or reduce our greenhouse gas emissions. Furthermore, climate change is not addressed adequately at all in the Regional Transport Strategy even though there is talk of demand management this needs to be more seriously addressed. The RTS needs to reflect changes since created last year including the coming into effect of the Kyoto Treaty.

7. With regard to rural issues we believe that the inter-relationship between urban and rural is extremely important but though the Plan acknowledges that 43% (last sentence of paragraph 2.4 of the Plan) of the regions' population live in rural areas (it is largely a rural region) it appears to have an urban bias and does not have a specific section to deal with the issues and problems of the rural areas. The lack of any policy guidance to address these matters will mean that subsequent policy formulation at a local level in rural areas through LDDs will have to be undertaken in a policy vacuum. The lack of guidance in this respect is a serious concern and omission. The omission of any serious rural content in the RSS will mean that subsequent rural policies in future LDDs will not carry the same weight being outside RSS 14 supported policy.

The 'infrastructure' required in rural areas to maintain sustainability is neither understood nor acknowledged. Support is required in some villages/rural areas just to maintain viability. Facilities such as bus services, post offices, shops, pubs are all important to rural life and for sustaining the village. However, over the past twenty years at an ever increasing rate these have largely disappeared. The Plan fails to acknowledge and therefore deal with this acute problem. However, we do not believe that building on existing villages to some imaginary "viability" level is the answer. If the strategy is serious about reducing unnecessary travel and increasing quality of life, then "taking the services to the community", rather than the other way round, needs consideration.

The focus on the Market Towns, is important but we would suggest that without complementary policies to deal with the rural areas and communities around them could have an unforeseen adverse impact through increasing, rather than decreasing travel needs. Diverting investment from the general rural area and concentrating it into market towns will not deal with the problem.

8. A further major omission of the plan is an indication of how the regional implications for large scale growth in adjoining regions such as East Midlands and London are recognised and brought into the Plan. There needs to be far more discussion of migration patterns, commuting, London Capacity and other inter-regional

effects.

Recommendations

- The level of proposed growth must be questioned and an environmental capacity study initiated for the whole region and for the sub-regions.
- Environment must be dealt with on an equal footing with economic and social objectives.
- That sustainable development is adequately addressed and a holistic approach developed to deliver win-win solutions.
- Climate change implications need to be addressed through out the plan.
- The conflicting messages coming through the RTS need to be addressed.
- Rural issues require a more in depth coverage than at present.
- Elaboration of mechanisms for examining inter-regional effects.

The East of England Plan RSS14

Chapter 2. Background and context.

Key drivers for change.

Oppose

Para 2.6 -2.7 CPRE East of England agrees wholeheartedly that sustainable development objectives should underpin the Plan vision. However given the results of the SEA/SA report it is clear that in fact the Plan is unsustainable

Para 2.8 CPRE would also agree that the Environment is a key asset and we welcome the words “*protecting and enhancing landscape character and biodiversity*”, this does however, need to be carried through to delivery. But, throughout the Plan the protection of the environment appears to be an afterthought and is placed at the end of all lists and criteria. It is not acknowledged in a sufficiently robust way that much of the regions environment is of such quality and sensitivity that it cannot accommodate or be associated with development of any nature or scale. Mitigation only ever tries to hide or reduce the harmful effects or impact of a development, it does not and never can fully compensate for it. The Plan appears to move the emphasis from outright protection of the environment to one of using mitigation to enable developments in less than appropriate or acceptable locations.

The text indicates that there will be a significant growth in households for a number of reasons, but also that there is a net outflow of migrants from the region this rather confuses the picture of housing requirements and we suggest that very careful monitoring and evaluation of real housing needs will be essential to prevent overbuilding and stimulating inward migration from London and elsewhere. Therefore we welcome the statement that the Plan has been prepared with the plan, monitor manage approach, but the inclusion of housing “targets” rather than a suggesting a range does suggest that in reality a **predict and provide** approach has also been adopted by the Plan and this we suggest means that the monitoring chapter will need to address this comprehensively.

CPRE East of England supports the “*meeting housing need*” aspirations (provided they are within the environmental and other constraints). However, we are not sure that the Plan does adequately address this issue. A further major omission of the plan is an indication of how the regional implications for large scale growth in adjoining regions such as East Midlands and London are recognised and brought into the Plan and how this Plan may impact on other regions.

Para 2.9 Spell out some fundamental challenges that face the region because of climate change and environmental damage. However, these concerns are not fully acknowledged in the later detail of the Plan. Policies of avoiding flood-plain development and of sea defence strategies are generally weak. Unsustainable development on flood plains can, it seems, as far as the plan is concerned apparently continue with minimal checks. Reference to the Adapting to Climate Change Study would be useful and to PPS25.

Para 2.10. This paragraph specifically acknowledges the need for concern about both quantity and quality of growth, although it does not take the opportunity thereby presented to ask critical questions about the indicators of economic growth that are currently in use. As the Sustainability Appraisal Report pointed out the RES (2001) target based on GVA and enhanced growth was environmentally damaging and unsustainable. However it is quite apparent that this recommendation to move away from such a measure has not been taken into account in the final document given the level of jobs/economic growth proposed, the jobs numbers being underpinned by the work done to meet that RES (2001) target (even though the new RES has dropped the target). We would want to see an explanation of why this hasn't happened?

Para 2.16. This paragraph is a welcome recognition of the problems associated with transport. In particular, the deficiencies of the orbital rail network (and indeed, of the whole orbital public transport provision) are a serious difficulty. This needs to be addressed much more strongly in the whole strategy, since the proposed radial growth areas will mainly increase the provision of radial links while adding to the pressures on orbital routes. As the paragraph notes, this is especially serious with respect to the Haven Gateway development

Para 2.11-2.14. These paragraphs are critical. Paragraph 2.11 recognises that current patterns of growth and aspirations associated with these are a source of pressure on the region. But paragraphs 2.12 to 2.14 then simply accept that continuation of existing historic patterns of change is inevitable, and make no attempt to examine or challenge the extrapolations on which such predictions are based. We are particularly concerned over the underlying calculations of housing numbers based on population estimates.

If you take the 2001 population of 5,402,500: at 2.38 persons per household (as per **Para 2.12**), this equates to 2,269,958 households. The 2021 population is estimated to be 6,050,500 (i.e. 5,402,500 + 648,000), which at 2.24 p/h (also **Para 2.12**) equates to 2,701,116 households. Therefore the increase in the number of households on this basis from 2001 to 2021 is 2,701,116 minus 2,269,958 = 431,158.

You do not need 478,000 new dwellings to provide for 431,158 additional households! Even if you add in additional dwellings to house existing 'concealed' households, i.e. another 15,100 (the difference between 478,000 and 462,900 in **Para 2.12**), this is still **31,742 too many**.

This does not imply that we accept all that the region should provide for a population increase as high as 648,000. A proportion of this number would itself be attracted by the provision of new dwellings in the region and would not move into the region if the houses were not built.

Hence, despite its protestations, this is in effect a strategy based on "predict and provide". CPRE suggests that there should be a serious examination of the processes that have underlain past trends, and that the Regional Assembly should be asked to consider strategies that might intervene to alter these processes, rather than simply being designed to accommodate their results.

Para 2.21 and 2.23. The recognition of the ESDP is strongly to be welcomed. The key themes of the ESDP are a clear and positive statement of the features of human development, and the claims that the RSS will take these to heart need to be substantiated. Unfortunately, by paragraph 2.23, it is clear that the UK Government's Sustainable Communities plan is leading the Plan, and this is actually just one of predict and provide.

Para 2.24. Whilst we wholeheartedly support the stance of EERA on the issue of a second runway we cannot support any further expansion of the airports as we believe expansion is inherently unsustainable. as the S.A points out :*"But the acceptance of growth at all, and the reference to an 'acceptable balance' between*

economic benefits and environmental and other considerations, still fails to grasp the point that further growth in air travel provision is environmentally unsustainable” (p71-72 Report of the Sustainability Appraisal Final Draft Oct 2004)

Para 2.28, 2.29. These do little more than reiterate that the strategy is supposedly one that will monitor and manage, and Section 11 does not inspire confidence in the management mechanisms that will be used.

Recommendations

- **Include a statement to the effect that expansion of airports is regarded as unsustainable.**
- **Re-examine the underlying assumptions on which the housing figures are based.**
- **There needs to be clear guidance on how to ensure plan monitor manage is implemented, e.g. phasing mechanisms, monitoring process and, management mechanisms (land release etc)**

Chapter 3 Vision and Objectives.

Oppose

CPRE East of England believes that in the main this is an inspiring vision, and one that needs to be kept to the fore throughout the strategy. Each of the proposals in the document needs to be measured against this general vision, to ensure that there is a definite chance of it being realized. Most of these objectives in 3.3 are excellent, and should be strongly supported. However, there is an implicit assumption in Objective 1 that growth is essential and the phrase “*sustainable balance between workers and jobs*” is an important aspect to aid sustainability but it is **not** the main issue enabling sustainable development. The “Vision for the East of England” states that spatial planning is intended to sustain and improve the quality of life for all people who live in the region. But much of this would involve widespread development on green fields, loss of countryside, urbanization of country villages together with increased congestion and pollution, this would be a substantial reduction in the quality of life for thousands of people.

Also the vision does **not** provide a positive enough environmental element to it. There should be a clear mandate for the plan to have **full regard** to environmental issues. The environmental element is a fundamental component of both ‘sustainable development’ and of the concept of ‘quality of life’. There is also a failure to recognise that the RSS must work within a limited **finite environmental resource** that is address the need to work **within the region’s environmental capacity**. This sets a too narrow context for accommodating the levels of growth within the region as set out within the main body of the plan.

The East of England Plan should be setting an agenda for **positive change for the environment**. , if the vision does not embrace such an aspiration the rest of the plan will be more than likely to fail this important aspect of sustainable development.

The reference within Objective 10 to enhancement of the natural environment is strongly supported, as is its reference to **landscape character**.

Objective 11 seeks to minimize the demand for resource use, particularly for water, energy, and minerals by being resource efficient which we support but, this is set within the context of accommodating the forecasted development ‘needs’ of the region, and *then* minimizing the resource impact of that provision, this approach may nevertheless still exceed the region’s environmental capacity. In some areas environmental constraints will act as limitations or restriction on development, and the RSS should acknowledge and accept this within the core strategy of the Plan

Para3.4. A fundamental delivery objective - to **provide the best balance between the objectives taken as a whole**. Balance *per se* we believe an outdated concept; it results in winners and losers when making strategic or local development decisions. It infers that to achieve some of the objectives, others may have to be compromised and value judgments taken as to how a balance is best reached. We believe that sustainable development must be about **‘net gain’** solutions, whereby any unavoidable losses (whether

environmental, economic or social) are at least neutralized, and preferably reversed, the avoidance of harm to environmental assets should always take precedence.

There is an absence of transparency in linkages between the objectives set within chapter 3 of the RSS and the more detailed topic specific chapters of the document. Whilst this is not always the case there are clear gaps within the policies of some of the topic chapters. For example, nowhere within the housing chapter is reference made to sustainable building design or consideration of landscape character and local distinctiveness.

Change sought.

- **There should be a clear mandate for the plan to have *full regard* to environmental issues and aspire to enhancement.**
- **Delete 3.4 or amend to talk about achieving win-win outcomes.**
- **Recognise that resource limits may act as a constraint on development.**
- **The vision needs to be carried through the Plan and used as a measure**

Chapter 4 Core Spatial Strategy

Oppose

We have some concern that whilst according to Para 4.9 the strategy embodies the key principles therein set out in the next 7 bullet points, not one reflect the needs to protect or enhance the environment or work within environmental capacity, 'respect' (bullet 4) is the only mention.

The influence of London is undoubtedly important (4.9), and the requirement that the region maintains pressure on London to mitigate its impacts is strongly to be welcomed but there is no discussion of how is this to be done and by whom

We are also concerned that the MKSM Spatial Strategy has run ahead of the RSS process and therefore it appears that this RSS is stuck with the consequences.

With regard to airports, we cannot agree with the claim that the implications of maximum use of existing capacity and the introduction of an additional runway are little different. Expansion to maximum use is regarded as unsustainable by the S.A Report, the additional runway must have much larger effects.

Paragraph 4.9 bullet point four refers to growth and development in the M11 corridor and says "both stages (regeneration and growth) must respect the natural, social and urban environments in a largely rural area of small towns and open countryside" (p15). With the levels of growth proposed we are concerned that this "respect" will not amount to much.

Changes sought

- **Need a reference to development within environmental capacity**
- **Detail of mechanisms to pressure London to mitigate its impact.**

SS1: achieving sustainable development

Oppose

Par 4.13 States that the starting point for the regional spatial strategy is the aim to achieve sustainable development which we fully support. We also support much of what is set out in SS1 but we believe that it should be strengthened. This very important policy must elaborate more on the key element of sustainability the need for effective protection of the environment and prudent use of natural resources in discussions on where development will go. It appear in SS1 That the aim is not as much sustainable development in its

fullest sense which must consider environmental limits, but to achieve “a sustainable relationship between jobs and homes and services”.. Whilst it does note that conservation of the region’s environment, character, natural resources and quality of life are also important, but these are clearly expressed as secondary considerations whilst seeking to achieve the first objective. The paragraph does not place the environmental elements of a sustainable future on the same level as the socio-economic ones, and so cannot truly reflect the objectives of sustainable development. This emphasis is similarly reflected in the final paragraph of the policy.

To reflect the full considerations of sustainable development we recommend a shift in the emphasis of its first paragraph to meet the growth needs of the region whilst working *within the capacity of the natural and historic environment*. Such a fundamental consideration should be interwoven within the plan from the outset. Whilst relevant to environmental capital in its widest sense, this is perhaps most starkly illustrated by the imbalance pointed out by the Sustainability Appraisal between growth demand and the capacity to provide new populations and business needs with water supply and disposal. (P43-44 SA. Final draft Oct04)

Tony Blair says in his foreword to the new Sustainable Development Strategy –Securing the Future

“Make the wrong choices now and future generations will live with a changed climate, depleted resources and without the green space and biodiversity that contribute both to our standard of living and our quality of life. Each of us needs to make the right choices to secure a future that is fairer, where we can all live within our environmental limits. That means sustainable development”

Para 1. We support the reference to a sequential approach in first paragraph, but believe it should say:

“It requires a sequential approach, **including across local authority boundaries**, to the location of major development as a core component of sustainable development .

“In some regions or sub-regions there may be concentrations of previously-developed land within one authority and a lack of it in neighbouring authorities. In such circumstances, the RPBs and structure planning/UDP authorities should work together to focus new housing development in areas where previously-developed land is available (or where there are existing dwellings suitable for re-use or buildings suitable for conversion) in preference to developing greenfield” (PPG3 2000, Para. 6)

Para 2. should read:

“In most instances development will be focused in or, **less preferably**, adjacent to, major urban areas”

Para 3. Should read:

“or where proposed development **will** contribute to improving public transport access.”

Para 4. We welcome the statement that the “demand for transport and other services will be managed to make the best use of existing infrastructure rather than relying upon major new infrastructure investment.” But there is reference to an “infrastructure deficit”; the policy needs to clarify what kind of infrastructure? The Sustainability Appraisal pointed out that this terminology implies some kind of entitlement which cannot in truth be justified or defined.

The implication here however is that the infrastructure in question is transport. We do not see that there is a roads deficit, but a deficit in public transport. And we oppose this sentence being included. The level of housing and other development proposed cannot be accommodated without massive government investment in infrastructure (not just transport) which so far Government has showed to be reluctant to fund. We are also concerned that the infrastructure required to meet such levels of growth would be of such a scale it would have unacceptable impacts on the environment.

The existing main rail and road corridors which run mainly north-south as spokes radiating from London are already operating at or near full capacity, and the existing east-west links are inadequate. The SRA in its presentation to the RPP (Feb 28th 2005) made it quite clear that there would be little investment to improve

the situation

We believe that SS1 falls short of setting out the means for achieving sustainable development. The Spatial implications text if included within the policy would go some way to addressing this failing.

Changes Sought

- **We recommend that the text in 4.14 should form part of the policy.**
- **Delete from Para 4 all reference to “infrastructure deficit”.**
- **Changes as outlined in main text.**

Spatial Implications

Oppose

Para 4.14. Whilst we warmly support the statements in 4.14 setting out some of the spatial implications of implementing this policy:-

Bullet 1. The value of non-designated environmental assets should also be acknowledged, taking account of their value to local people and the contribution to they make to the linked networks of habitats, landscape diversity and historic environment.

Bullet 2. “Maintenance of the broad extent of development constraint offered by the Green belts” we cannot support the second bullet point which allows for reviews to support growth of selected key urban areas. As we believe that the basis of any review should be whether the particular greenbelt is fulfilling its functions (as set out in PPG2) or that there are very special circumstances to justify it. The proposed reviews seem to misunderstand the purposes if the Green Belt and its permanent nature.

Bullet 4. Focusing on Market Towns as a way of supporting rural areas is important, but without complementary policies to deal with the areas and communities around them the approach could have an unforeseen adverse impact through increasing, rather than decreasing travel needs. Diverting investment from the general rural area and concentrating it into market towns will not deal with the problem

Bullet 5 Welcome but we feel there are elements missing perhaps you cannot capture them here in succinct statements but rural villages need to be dealt with in far more depth.

Bullet 6 Refers to ‘regional diversity’. The text at this point should make clear that environmental diversity, particularly regarding landscape character and ‘sense of place’ within the built environment should be included explicitly within this objective.

We particularly welcome the last bullet point in the series (4.14), that the implementation of the Sustainable Communities Plan Growth Area Proposals will be guided by the overall principles set out in 4.14 as we have seen no evidence that the SCP had protection of the environment in mind.

So as we have already stated above, we want to see these good words reflected in the actual policies where it will carry weight.

We do feel there are still elements missing: There is little about making existing settlements more sustainable. However, we do not believe that building on existing villages to some imaginary “viability” level is the answer. If the strategy is serious about reducing unnecessary travel and increasing quality of life, then “taking the services to the community”, rather than the other way round, needs consideration. This would demand different boundaries for accountancy - the “visible” costs of things like mobile libraries, village surgeries etc. are someone’s concern, whereas the hidden costs of transport, of deprivation etc. someone else’s worry

Changes Sought

- **Include 4.14 as part of SS1 with some amendments.**
- **Ensure the value of non designated landscapes is recognised.**

- **Expand to include issue of making existing settlements more sustainable.**
- **See comments in main text.**

Headline targets.

Oppose

We welcome the statement (4.15) that “within overall environmental constraints of the region, growth is led by improvements in quality of life and prosperity rather than increases in housing”.

However, we consider that the three headline targets selected are skewed in favour of economic development and do not give sufficient recognition to environmental constraints.

Specifically we object that a headline target for protecting the environment and ensuring prudent use of natural resources is not included.

Bullet 2 we welcome:

“London and the South East must implement corresponding policies to accommodate such pressures, by means of a matching approach to in-migration into the South East region, and increased housing supply within London to meet a higher proportion of the capital’s overall needs. EERA notes that the Draft London Plan aims to accommodate London’s growth within its own boundaries and that the Examination in Public Panel Report proposes increasing the housing provision target within London to meet this aim”

However: The EE Plan should perhaps explain broadly what it expects the other regions to do and who in London should do it, and who in EE will see to it?

There is no analysis of what is meant by housing need, and an implicit assumption that house building and economic growth can be varied independently and controllably. We do not believe we should be meeting London’s needs which could be inexhaustible.

Bullet 3. On the third bullet point (affordable housing), the target of increasing the provision of affordable housing to at least 30% of total housing supply (i.e., existing and new housing stock) we cannot support this target as it has been used to generate the overall housing figure which we believe are unsustainable, and simply rely on the planning gain route to deliver affordable homes, we would prefer to see far higher targets or alternative funding mechanisms to ensure delivery of affordable homes without the attendant large quantities of market home. This method of delivery also fails to address the reality that affordable homes may not be built where they are needed by the planning gain route. If a percentage route is favoured then increasing the target would lower considerably the number of overall market homes needing to be built.

Para 4.16 bullet 1. The text assumes that development is required or a pre-requisite to sustain present levels of economic activity and services. Current levels of activity might well be achievable without development. We question whether it is desirable that all counties have a growth rate not lower than present RSS rates? We question whether such levels of growth are in fact sustainable.

Bullet 4 Needs to clarify the type of positive action needed.

Change sought

- **Headline target for environmental protection.**
- **Explanation of what is required of other regions and the mechanisms for action.**
- **Definition of need**
- **Outline the kind of positive action required bullet 4.**

SS2: overall approach to the spatial strategy

Oppose

We support the emphasis on sequential development established in this policy and but would like to suggest that reference to sequential approach should contain 'including across local authority boundaries'.

Concentrating growth on key centres would appear to be sensible in principle to attempt to bring together the requirements of homes, jobs and community facilities, provided this development is of a high quality. Though, for each settlement it will be the level of phasing and speed of growth that will determine the environmental and social impact. For example ensuring that public transport is provided at the same time as houses are completed will be essential to prevent unsustainable travel habits being established. However, more importantly criteria need to be established early on as to what the triggers will be for development - for example what type of agreement on infrastructure should be in place before permission can go ahead and what monitoring will be done to ensure that this is indeed carried out? There must be examples set for the LDDs.

Regarding quality of design - it will be essential to look for imaginative solutions to urban design, and to take seriously the planning function. This is not something that can be left solely to market forces, but requires strong, positive encouragement at all levels. Community involvement will be vital to this process. We are concerned that M11 corridor towns are listed as key centres, most are market towns or villages the setting of which e.g. Saffron Walden, would be completely destroyed by any significant expansion

Oppose

Last paragraph:

We are fundamentally opposed to any suggestion of a new settlement and support the fact that none has been called for in this Plan, although we agree that any review of this matter should first examine whether there is actually a **need** for one. Under 'plan, monitor, manage' it will be essential to reconsider the up-to-date position in respect of urban capacity as well as progress against agreed development trajectories before the new settlement option should even be contemplated, let alone any discussion of its potential location.

Change sought:

Delete last paragraph including bullet-points of Policy SS2 and the last two sentences of Para 4.17.

Para 7 Add: a sentence Local Development Documents will also include phasing and triggering criteria for the release of land.

SS3: development in and adjoining urban areas

Policy SS3

Oppose

CPRE East of England supports the emphasis in point one in this policy that development in urban extensions must not detract from the need to utilise previously developed land first and the needs of urban renaissance. Premature release of greenfield land in or adjacent to areas where urban previously developed land (PDL) is available will undermine efforts to bring PDL back into use and detract from urban regeneration. We are particularly concerned that any release of the Metropolitan green belt could hamper regeneration and intensification efforts in London. No actions should undermine the objective contained in the London Plan to contain its growth within the Capital's own boundaries. Outward migration from London is the greatest driver of population change in the Eastern region and inevitably leads to unsustainable travel patterns as the people move but the jobs don't.

There should be a clear linkage between progress on urban PDL /regeneration and the release of greenfield sites. Unfortunately SS3 it reads at the moment as though greenfield release will be at the same time as re-use of PDL, the policy as worded could lead to significant releases of green field land and the loss of valued countryside and fail regeneration plans. The relative priority of Point 2 - the greenfield option - needs to be explained. It needs to be made much clearer that point one is the first option and must be utilised prior to point

2 being considered.

Under the sequential test we would prefer there to be a hierarchy where urban development first and adjacent next, this could be addressed simply by adding the words *less preferably*, in before adjacent to urban areas”

We also want to ensure that action in our region does not detract from the same efforts in adjoining regions.

In point 2 we would suggest that the character of the settlement must also be taken into account. The penultimate paragraph is contradictory given that it states that *“Greenfield land releases must be appropriate in scale to the adjoining urban area”*. Yet *“must be large enough to provide a sustainable form of development...”* (p21) the list of services/infrastructure that such development should have rather implies a very large new addition.

The word *“sustainable”* appears twice in point 2, but it appears to have slightly different meanings in different contexts. In point 2, *“the most sustainable option”* includes avoidance of adverse impact on environmental assets (as we would expect), but lower down *“a sustainable form of development”* does not specify environmental assets (although the supporting text in paragraph 4.19 does).

Policy SS3 penultimate paragraph should be amended to read: *“Any significant urban extensions proposed should be demonstrated to provide a sustainable development in relation to employment, public transport provision, protection of environmental assets, and social, health, education and community facilities provision.”*

Welcome final sentence. Could usefully be expanded to read:

“Co-ordinated and complementary strategies should be considered where areas nearby to each other may offer potential alternative locations for development which are preferential within the sequential approach.”

Changes sought

- **Clear hierarchy should be shown of maximum use of previously developed land first before consideration of release of any greenfield.**
- **Add words - *less preferably*, in before adjacent to urban areas in first paragraph.**
- **Consistent use of the term sustainable.**
- **Policy SS3 penultimate paragraph should be amended to read: *“Any significant urban extensions proposed should be demonstrated to provide a sustainable development in relation to employment, public transport provision, protection of environmental assets, and social, health, education and community facilities provision.”***
- **Final sentence expand to read: *“Co-ordinated and complementary strategies should be considered where areas nearby to each other may offer potential alternative locations for development which are preferential within the sequential approach.”***
- **See also main text.**

SS4: use of previously developed land and buildings

Oppose

Whilst we warmly welcome the target of 60% of all new development on previously used land and the need to ensure consistency of approach to urban capacity studies. We would prefer to see this target raised to at least 75% bearing in mind the achievements over the past few years and that it appears to be a rising trend. We have some concerns as to how the regional target will be met if each LPA is left to come up with their own targets. We believe that each District needs to have a PDL target of its own, if the RSS can do so for housing figures so too should it do so for minimum percentages for urban PDL.

There is also some ambiguity in the supporting text para 4.32 – It is not clear whether the 60% of new dwellings is part of the 60% of new development (i.e. 60% of 60%) or are they concurrent targets in which case why differentiate between new development and new dwellings?

4.24 We welcome the statement that not all brownfield land is suitable due to biodiversity interest; it is an urban open space asset or location which is not in line with PPG13/25/7.

Changes sought

- **Increase the target to at least 75% of all new development on ...**
- **Due to ambiguities in the text we recommend that SS4 states ...60% of all new development... and 60% of all new dwellings...**

SS5: town centres

Support

CPRE East of England agrees that vibrant attractive town centres are fundamental to sustainable development as we see these as the most sustainable option for human habitation as it allows for economies of scale for delivery of services, reducing travel needs and also for limiting expansion into the wider countryside. We would however like to see some mention of the need to maintain the historic setting which also plays a vital role.

SS6: transport strategy

Oppose

We **support the aims of this policy** and the emphasis on reducing demand, improving public transport which accord with PPS13. In fact if this policy could be realised, then it would produce great improvement to the environment of the region, **but** we do not see that this has been carried forward into the transport strategy where significant levels of road schemes are supported. The policy does not address the lack of rural service accessibility where innovative schemes may need to be delivered to accord with PPS1.

“Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, whilst recognising that this may be more difficult in rural areas”. (27 v PPS1)

It is also not clear how this policy relates to the airports. We do **not** support any need for further expansion at Stansted or Luton airports as we believe this to be unsustainable given the terms of the Kyoto Agreement.

We are concerned that the supporting text (4.28) ensures that some of the force of this is good policy is lost to the requirement to reduce the problems of congestion and strategic movements to other regions, ports and airports. Experience has shown time and again that this apparently innocuous requirement simply moves the problems around, or increases them in the longer term.

Changes sought

Policy needs to be carried through into the transport strategy

SS7: green belt

Oppose

Policy SS7: Green Belt (including Para 4.32-6)

We cannot support this policy even though we welcome the statement that the broad extent of the Green Belt will be maintained. However, we dispute the need for reviews of the Green Belt boundaries around some urban areas. No rigorous assessment of the sustainability of retaining present Green Belt boundaries has been carried out. We do not believe that sustainability has been compromised by the present boundaries. The

suggestion that Green Belts “have led to dispersion” (Para 4.32) is largely anecdotal and unproven, and should not be used as a trigger to take land out of Green Belt designation. It is indeed national policy that any review has to satisfy the national criteria for Green Belt releases, and in our view the very special circumstances to justify such releases in the East of England have not been demonstrated.

The Green Belt was established to meet the five purposes given in paragraph 1.5 of PPG2 — to check unrestricted sprawl; to prevent coalescence; to safeguard the countryside; to preserve historic towns; and to encourage urban regeneration. The Green Belt has been successful in meeting these aims: it is doing its job. Rolling back the Green Belt in order to accommodate the growth areas identified in this Plan would be in direct conflict with the purposes of designating the existing Green Belt in the first place. ‘Protection’ should actually mean ‘protection’, and not just a temporary designation to be removed when it appears inconvenient.

If releases from the Green Belt are made to meet perceived development requirements up to 2031, that is once again a ‘predict and provide’ approach, rather than ‘Plan, Monitor, Manage’. Such commitments for 10 years beyond the life of this Plan immediately have the effect of ‘inviting’ development into the land so released — and even blighting it — whereas it may never be needed, either because the market takes a downturn or because more previously-developed land becomes available for use before greenfield sites.

It is a misunderstanding of the nature and objectives of the Green Belt to suggest that it is the total quantum that matters. It is the *location* rather than the *land area* of Green Belt that is important, and a narrow area of Green Belt a few hundred metres wide in the right place can be worth more than several sq km of Green Belt designation elsewhere where the urban sprawl pressures are not so great. Nevertheless, notwithstanding our fundamental objection to releasing land from the Green Belt and without prejudice to that, any loss which does occur should be fully compensated for. There are several parts of the Region which would benefit from new Green Belt designation and where the PPG2 purposes would be satisfied, for example round Norwich and Peterborough and along the western boundary of Bedfordshire with Buckinghamshire and Milton Keynes. A consultation on new areas of Green Belt within the Region should be initiated.

The need for a “*positive vision of the role of rural areas between settlements*” is not limited to areas of Green Belt review, and should not be used as a palliative to make Green Belt release more acceptable. The danger of coalescence between settlements, especially in areas of proposed urban extensions, is a very real one (whether in an area of existing Green Belt or not), and urban fringes especially tend to attract urban uses such as formal sports pitches and associated buildings, golf driving ranges, floodlighting etc which are all alien features in what should remain undeveloped countryside.

Regarding the Cambridge area, we welcome the comment that no further review is needed to 2021, but we would point out that the last review was to last until 2034: this should be noted in the Plan.

Change sought

- **No review of the greenbelt.**
- **Initiate consultation on new areas for green belt**

SS8: land in the urban fringe

Oppose

We are not convinced that positive management of the kind proposed in this policy and the supporting text will safeguard the urban fringe from further development encroachment and degradation. Strong policies are needed to prevent ‘creeping urbanisation’ of the urban fringe. Urban extensions and new development are not likely to contribute to the enhancement of the urban fringe. Elements to enable access may be inappropriate in a countryside setting (e.g. car parking) and this needs to be recognized somewhere in this policy.

Para. 4.41 Line 1. The point about green space targets should be established as a policy

New policy on Light pollution

CPRE East of England would also like to point out the need to ensure light pollution does not spread further and further out from settlements into the countryside and therefore suggest that there needs to be wording about inappropriate lighting and light pollution in here unless covered in another policy.

There is also the issue of tranquillity which is deteriorating in the East of England as pointed out by the SA. (p12 Summary) we feel that some measure of tranquillity should be within the Plan as an indicator perhaps as part of a countryside quality indicator.

Changes sought see text.

- **Indicator for tranquillity**
- **New policy on Light pollution**

CPRE East of England would also like to point out the need to ensure light pollution does not spread further and further out from settlements into the countryside and therefore suggest that there needs to be wording about inappropriate lighting and light pollution in here unless covered in another policy.

SS9: development in rural areas

Oppose

Firstly, the issues affecting rural areas are given limited coverage. Where they are covered policies are generally positive. But, whilst the plan acknowledges that 43% (last sentence of paragraph 2.4 of the Plan) of the regions' population live in rural areas it appears to have an urban bias and does not have a specific section to deal with the issues and problems of the rural areas. The lack of any policy guidance to address these matters will mean that subsequent policy formulation at a local level in rural areas through LDDs will have to be undertaken in a policy vacuum. The lack of guidance in this respect is a serious concern and omission. The omission of any serious rural content in the RSS will mean that subsequent rural policies in future LDDs will not carry the same weight being outside RSS 14 supported policy.

The policy needs recognize that good planning and attention to the countryside benefit urban populations; rural issues do not just affect rural populations, especially, natural resource protection, flooding, landscape quality and tranquillity.

The 'infrastructure' required in rural areas to maintain sustainability is neither understood nor acknowledged. Support is required in some villages/rural areas just to maintain viability. Facilities such as bus services, post offices, shops, pubs are all important to rural life and for sustaining the village. However, over the past twenty years at an ever increasing rate these essential blocks to rural life and existence have largely disappeared. The Plan fails to acknowledge and therefore deal with this acute problem. However, we do not believe that building on existing villages to some imaginary "viability" level is the answer. If the strategy is serious about reducing unnecessary travel and increasing quality of life, then "taking the services to the community", rather than the other way round, needs consideration. This would demand different boundaries for accountancy - the "visible" costs of things like mobile libraries, village surgeries etc. are someone's concern, whereas the hidden costs of transport, of deprivation etc. someone else's worry.

The Plan seeks to deal with rural issues purely by focusing on Market Towns. While some development in market towns and larger villages is required to help them support surrounding rural areas this approach alone will not help sustain rural areas. Investment and very limited development carefully targeted is also required. The approach needs much more thought. Without complementary policies to deal with the areas and communities around them the approach could have an unforeseen adverse impact through increasing, rather than decreasing travel needs. . PPS7 is helpful about the hierarchy of settlements.

SS9 final bullet point We are concerned that this last bullet point establishes a requirement of LDDs which may lead to inappropriate development in the countryside, we believe that diffuse development in the

countryside should be avoided at all costs as it can generate traffic and change the character of remote areas such that they lose those aspects which makes them attractive to tourists for example tranquillity.

Suggest adding: All developments in rural areas should be assessed against landscape character considerations and potential traffic generation. These should include a detailed assessment of the local landscape character and how it is valued

We are very concerned that whilst there is mention *that "local authorities should seek to assist the continued viability of agriculture..."* (para4) there does not appear to any policy commitment to protect grade quality agricultural land which is a significant national resource.

Supporting text

There needs to be somewhere in this policy an explanation of how 'local needs housing' will be secured. I.e. how they will stop new housing being bought by non-locals. It is not clear what kind of housing is being talked about here.

Para. 4.44 4th bullet. Does this mean that market towns that have no spare capacity cannot be defined as such for the purpose of the RSS? If so, that is to be welcomed, if the strategy is to expand 'market towns'.

Changes sought

- **Clear policy guidance on rural service delivery planning and sustainability of rural settlements.**
- **Final bullet point add in; "that diversification needs to be appropriate to the setting and all developments in rural areas should be assessed against landscape character considerations and potential traffic generation. These should include a detailed assessment of the local landscape character and how it is valued.**

SS10: the regional economy

Oppose

Unfortunately this policy could completely undermine all the good work that might be done by implementing the other policies. We would challenge the simplistic assumption that developing the local economy will automatically improve quality of life. The limp claim that this growth "*will follow the principles of sustainable development*" is at best weak and at worst, dishonest, since no clear criteria are set to test sustainability. The suggestion that a broader range of quality of life criteria should be used (*Para 4.51*) is important, but lacks detail and strength.

CPRE East of England **does not support** the aspiration for an additional 421,500 jobs. We believe that the derivation of the figures is flawed and based on a target which is unsustainable. The target underlying the figures was arrived at from

- a) The jobs forecast from the enhanced growth proposals from the Bone Wells study prepared to determine how to meet the RES target to be in the top 20 regions in Europe by 2021, known as EG2021 which means an increase of "24%" of jobs in the region. (Answer given to a question in discussions by Scrutiny Panel 7th Nov 2003). The Bone Wells study did not take environmental issues into account.
- b) The final figure was derived using a "methodology of Enhanced Growth 2021 plus the communities Plan and regeneration aspirations to 421,500 jobs (ie.331,000 + 35,100 + 50,900+ 4,500) an increase of at least 90,100 over the existing EG21 projections" (Conclusion Para 66, Economic Development Task Group – working paper RES and RPG14 –Employment, Labour, Population and Housing 2021, Appendix Agenda Item 10 Regional Planning Panel 17th Oct 2003). We believe these figures are largely aspirational, and also that there is likely to be an element of double counting as we believe that EG21 took regeneration into account.

But not only do we think the figures aspirational, the economy in the south of the region is in danger of overheating we cannot see how the East of England can gain a disproportionate share of the national jobs when at present the region has 12.5% of national jobs and if the Plans aspirations are achieved this we understand would equate to 21% of estimated national jobs by 2021. (Figures provided by Essex Partnership Steering group). Fuelling this by massive development will detract from the quality of life in this part of the region. Economic development must be geared to the region's environmental capacity.

We believe that this policy is a 'predict and provide' approach which will lead to premature allocation of employment land in advance of proven need. This could result in companies moving out of existing sites to new sites leaving the less favourable (perhaps older) sites empty or to an overprovision of sites which are not filled.

And any development must be monitored so that it remains within environmental capacity and without encouraging inward migration or exacerbating commuting, at the same time we believe that it is contradictory to government policy to reduce regional disparities.

"The MPs say Government must address the fact that its proposals for major new house building in the already over-burdened South East of England reflect a "predict and provide" approach that condemns other regions to remaining less prosperous. It was also disingenuous of Ms Barker to insist that there was no geographical dimension to her proposals for increasing housing supply." (Housing - Building Sustainable Future, Jan 30th Environmental Audit Committee)

Para 4.54 The call for additional housing provision to be aligned with "aspirational" jobs provision means that housing provision would be excessive if the jobs fail to materialize.

Change sought.

We believe the underlying assumptions on jobs growth must be questioned and seek a lowering of the jobs figures.

SS11: priority areas for regeneration

Support

Whilst **we support the aims for regeneration** and we are concerned that regeneration could be undermined by lack of resources and by greenfield development in advance of re-use of previously developed land. The policy claims to take in environmental deprivation but as far as we can determine the areas have been selected on social and economic grounds.

Also we cannot see how the level of housing relates to the level of deprivation for example Hertfordshire which has a comparatively low level of deprivation is required to create a disproportionately high number of new jobs with associated development, thus concentrating growth on the overheated south of the region.

With regard to areas such as the remote rural areas of Norfolk and Suffolk, we would question the extent to which these areas suffer poor economic development. This should not be a basis for footloose development in the countryside nor should the remoteness lead to a desire to make them less remote through infrastructure development (roads) this would have a detrimental effect on the tourist economy and spoil the last remaining tranquil areas of the region.

SS12: health, education and social inclusion

Support

Phasing of development will be essential to ensure adequate provision is in place.

SS13: overall housing provision

Oppose

CPRE East of England cannot support the level of growth proposed in the region, we dispute the need for 478,000 net additional dwellings in the region over the period 2001-2021. *Policy SS13* falls into the category of predict and provide. The overall housing provision is predicated on assumptions about net inward migration, decreases in household size and rates of economic growth, which we believe to be unrealistic.

The presentation in the Plan of overall housing figure was derived, according to the RPG14 Housing and Employment Alignment Report (R.Tyms & Partners August 2004) from the midpoint between two bookend estimates arrived at by different routes.

1) The affordable housing route (CCPHR affordable housing study 2003) providing one bookend -24,200. This is based on an assumption of a need of 7,200 affordable homes to be achieved as a target percentage of market build (30%) plus an addition to take into account past underachievement to give the figure of 24,200. “(the need for affordable housing was then grossed up to calculate the total numbers of houses required to be built if the necessary numbers of affordable homes were to be required)” (Para 3.16 RPG14 Housing and employment alignment report August 2004)

This methodology relies very heavily on the assumption that:

- a) Market build will deliver 30% and makes no estimation of alternative funding routes or of site size limits.
- b) It does not allow for the fact that need may not be where the market housing will be built.

We believe it makes little sense as a way to estimate total housing provision in terms of actual need and location.

The Sustainability Appraisal section 4.4 says: “The reasons lower growth was rejected appear to be pragmatic and political: that Government would not accept it ...” We do not believe that this sounds like a Plan based on sound analysis of population, household forecasts and local needs, but rather that a figure was given (SCP requirements?) and then retro-justified. Well, in trying to do that, the numbers just don't add up.

The second bookend was jobs led and based on jobs growth targets, “the analysis estimated the amount of housing required if the labour force grew at a rate needed to fulfil EG21 plus jobs aspirations” (Para 3.16 RPG14 Housing and employment alignment report August 2004) This used a base jobs figure of 421,500. And provided a figure of **23,600**, EG21 means an increase of some 24% of jobs in the region (Agenda item 10b Regional Planning Panel 21st November 2003).

We are particularly concerned about the jobs derived figure given that:

- the original work which was used to develop the Regional Economic Strategy GVA growth target pointed out that there wouldn't be a big enough labour force in the region to meet the economic aspirations and we suggest that the level of housing is designed to accommodate this gap, by encouraging in migration above current levels.
- We regard the high level of jobs growth as largely aspirational.

Our third major concern is over the underlying calculations of housing numbers based on population estimates.

If you take the 2001 population of 5,402,500: at 2.38 persons per household (as per **Para 2.12**), this equates to 2,269,958 households. The 2021 population is estimated to be 6,050,500 (i.e. 5,402,500 + 648,000), which at 2.24 p/h (also **Para 2.12**) equates to 2,701,116 households. Therefore the increase in the number of households on this basis from 2001 to 2021 is 2,701,116 minus 2,269,958 = 431,158.

You do not need 478,000 new dwellings to provide for 431,158 additional households! Even if you add in additional dwellings to house existing 'concealed' households, i.e. another 15,100 (the difference between 478,000 and 462,900 in **Para 2.12**), this is still **31,742 too many**.

This does not imply that we accept that the region should provide for a population increase as high as 648,000. A proportion of this number would itself be attracted by the provision of new dwellings in the region and would not move into the region if the houses were not built.

The SEA report also points out that within the Plan there is an ambiguity of purpose – “enable housing to catch up with jobs to address problems of shortage, affordability and commuting or to develop balanced communities with jobs and housing broadly in balance”. (p59)

The report goes on to point out that **the same housing cannot do both** and if RSS14 achieves balanced communities it will not redress existing housing shortages and therefore government could seek yet more growth “a policy vicious circle”. (p59)

- Underlying assumptions and calculations need to be re-examined.
- The assumptions on which the figures are based need to be more explicit
- There must be an audit trail back to the original work
- There needs to be a clear explanation of just what the Plan is trying to achieve.
- An appendix which details how they are derived county by county should also be provided.

Whilst we welcome the level of provision for affordable housing we feel that in some areas this may be too low and the target of 30% may need to be increased significantly. We object to the heavy reliance on this being obtained through planning gain route unless the target is significantly increased to reduce the overall housing requirement. There is a very large assumption that the planned level 7,200 dpa should be provided through local authorities being able to extract 30% of all housing as affordable housing (40% in particular areas given the levels of unmet need) but we are already seeing avoidance by developers using the ‘exceptional site costs’ get out clause to reduce planning gain, we do not believe that this target will deliver the required affordable housing and that significant alternative mechanisms for delivery and therefore funding provision will need to be available.

The impact of the Plan’s proposed growth levels on the countryside is of particular concern. There is likely to be significant environmental damage, loss of Green Belt land, quality agricultural land, and the likelihood that without necessary infrastructure the impact will be felt over a wide area. The case has not been made for the huge figures for additional housing. The scale of building proposed cannot be supported by the infrastructure, will not solve the problems of affordability and key worker housing, but will result in crowding, congestion and reduction in quality of life. In rural areas, an aspiration to “clear” existing need and move towards future need, could lead to large blocs of housing on Greenfield sites, which may not meet specific geographical need.

We are also very concerned that key worker homes are in fact only subsidized market homes and will therefore need to be replaced constantly as they get sold on unless there is some clause about affordability in perpetuity or shared ownership. If the levels proposed are however to reduce unmet need and provide for social housing this would be more sustainable than the current proposals as set out here, which require a large percentage of market housing to be delivered.

While it is claimed that monitoring and management processes will be used, these seem to be regarded only as means of ensuring that the house building targets are met or exceeded, and take no account of other aspects. Nor is there any indication of how such processes might be made to work. Therefore we recommend that much stronger monitoring and management functions will need to be instigated and we are aware from the RPP papers 28th Feb 2005 that monitoring of jobs is fraught with problems. There also needs to be a mechanism for reducing as well as increasing, the provision of housing /infrastructure if the jobs are not achieved, and most importantly also if it becomes apparent that environmental damage is occurring.

Phasing: We therefore recommend that the final housing total for the region as a whole and each local authority be split into 5 year phases, so that if conditions arose the 20 year allocation is not squandered in early years of the Plan.

In addition to the 5 year phasing consistent with plan monitor manage; the release of housing development

locationally should be triggered by explicit employment growth in that travel to work area. It may be helpful to have a table such as in the London Plan (Table 6 A.1), indicating average annual phases of growth in jobs and houses.

The consequences of not doing the phasing and triggering would be unrestricted increase in housing which would result in high levels of unsustainable long distance commuting

Change sought:

- **Reduction in housing numbers for the region.**
 - **Underlying assumptions and calculations need to be re-examined.**
 - **The assumptions on which the figures are based need to be more explicit**
 - **There must be an audit trail back to the original work**
 - **There needs to be a clear explanation of just what the Plan is trying to achieve.**
 - **An appendix which details how they are derived county by county should also be provided.**

- **More flexible target for affordable housing - minimum 30% or less emphasis on delivering affordable housing by planning gain route may be preferable to have explicit targets in each LDD area rather than as a percentage of market homes.**
- **Set out a clear phasing mechanism e.g. the final housing total for the region as a whole and each local authority be split into 5 year phases, so that if conditions arose the 20 year allocation is not squandered in early years of the Plan.**
- **In addition to the 5 year phasing consistent with plan monitor manages; the release of housing development locationally should be triggered by explicit employment growth in that travel to work area.**
- **It may be helpful to have a table such as in the London Plan (Table 6 A.1). Indicating average annual phases of growth in jobs and houses.**

SS14: development and flood risk

Support

CPRE East of England **generally supports this policy** as it is very important, but we feel it could be further strengthened. Further risk analysis and a much stronger presumption against development that could result in increased flood risk should be considered. Where defences are maintained, new development may be acceptable (for example in the Thames Gateway) this point is made in par 4.70 but this needs to be brought into the policy.

Change sought

See text

SS15: the coast

Oppose

We are concerned that this policy underestimates the potential impact of climate change induced events.

It is however also, undermined by support for Bathside Bay and London gateway which CPRE East of England opposes. We are also disappointed that whilst tranquillity, natural character and the historic environment are all mentioned, there is no specific policy reference to landscape. The coastal undeveloped landscape is rightly highly regarded for its sense of remoteness and its dramatic vistas of sea and sky.

As we have said in other sections we are concerned about the approach that 'balance' needs to be struck between the environmental role of the coast and its importance as an economic, social and functional asset. There should be a better way to address conflicting demands through a sequential decision making process in such a way as to

- a) **avoid damaging impacts** (environmental, economic or social),
- b) **mitigate** unavoidable harm through good planning and innovative design,

- c) And **compensate** residual harm to produce overall **net gain** (*through planning gain*). In adopting such an approach there should be the understanding that there should be **no net loss** of assets of national importance.

We support the promotion of integrated coastal management within the policy and the recognition of the need to achieve proper conservation of the coastal environment, its historic importance and tranquillity of undeveloped areas.

Bullet 7. We do not believe that the emphasis on protection of important environmental assets should be qualified by the statement...

'if it is practicable and sustainable to do so without causing adverse impacts elsewhere'.

The implication here is that the other concerns take precedent, that environmental considerations will be afforded weight only after other development priorities are considered. In some circumstances such an approach will be inappropriate *in law* given the level of protection afforded to internationally designated habitats, where harm through development will only be appropriate in the most exacting set of circumstances.

Para 4.78-4.79 We support the principle for accepting no net loss of biodiversity assets.

Reference to English Heritage guidance on coastal historic environments is supported as is the reference for LDDs to have full regard to Shoreline Management Plans, Integrated Coastal Zone Management Plans, Estuary Management Plans and plans specifically aimed at Habitat Regulation sites, as they adopt a more spatial approach to land use planning.

Changes sought

- **Seek to address conflicting demands through a sequential decision making process.**
- **Bullet 7. Remove the words; 'if it is practicable and sustainable to do so without causing adverse impacts elsewhere'.**

SS16: quality in the built environment

Support

CPRE **supports this policy** which we believe will encourage quality build and especially the use of sustainable construction techniques in urban areas. Quality of the built environment is critical to the aspirations in the overall vision, and every means should be used to encourage high quality development. This may mean increased costs in the short term, and so is unlikely to occur if left entirely to market forces. The aspirations within this policy are highly laudable, taking account of regional character and making positive use of existing assets. However, very careful design may be needed to ensure higher densities do not detract from the character of villages/settlements in more rural locations, where the character won't bear it and design won't cure it then it should be refused.

PPS1 - '*General Policy and Principles*' requires that '*good design should be the aim of all those involved in the development process and should be encouraged everywhere*'. This policy is supported by ODPM's good practice guidance '*By Design*' and '*Better Places to Live*'. PPG3 - '*Housing*' places a considerable emphasis on securing well designed residential developments of the highest standard. However, research undertaken by CABE (*Housing Audit: Assessing the Design Quality of New Homes*. Phase 1 report. CABE, 2004), has shown that well designed housing schemes are the exception rather than the norm, with less than 20% of those surveyed being rated by CABE as 'good' or 'very good'.

Achieving good quality design - and rejecting poor quality - needs to be 'hard-wired' into the Plan: procedures that favour good design should be the default option rather than requiring any special initiative and commitment by decision-makers.

Change sought

Bullet 8 Replace the word “reduce” with “*minimize*” Using reduce assumes an inbuilt level of pollution which we should not be including if we intend sustainable outcomes.

Supporting text

Supporting text

Para 4.85: Strongly welcome support for high density.

Para 4.88 Paragraph 4.88, the last sentence in the first paragraph is unacceptable and needs rewording delete the words “*sensitive exploitation*” from paragraph one. The use of these words is to change the emphasis from conservation to economic exploitation which may lead to inappropriate developments. **Change wording to read “*Policies should consider how heritage assets can sensitively be adopted or used to assist with the regeneration without compromising their intrinsic value and importance***

Change sought

See main text

5 sub-regional and sub-area policies

We have some concerns about the determination of the boundaries of the sub regions, particularly in those counties which have more than one. We would like to know what public consultation on the boundary detail and justification behind the proposed areas is intended?

The amount of detail and comprehensiveness of these sub-regional/ sub-area polices seem to differ widely; some are broadly indicative, while others go into almost minute detail. It is also here that some of the realities of what is being suggested began to strike home. The regular stress on economic growth as being the key driver becomes more strident. There is a welcome emphasis on providing an attractive environment to encourage inward investment, but we must ask whether this investment is likely to be realised, whether it will be short term and at the expense of adjoining areas. Also despite the rhetoric of the Regional Transport Strategy the primacy of road provision, as opposed to any other transport expenditure is clear in all the cases, especially with respect to the Haven Gateway and Thames Gateway policies.

We suggest that there needs to be greater consistency of treatment and a clear steer provided to those developing the LDDs, unfortunately, the inconsistency of approach across the chapter gives the impression that the core spatial strategy policies are being diluted or applied inconsistently across the plan as a whole. If this is the case, then the integrity of the East of England plan as drafted must be seriously questioned.

We are aware that the sub-regional polices take precedent over the generic, this causes us concern with regard to the treatment of environmental polices as in order to ensure sustainable development these must be a major consideration. All environmental assets where ever they are located should be afforded equal high level protection. Sub-regional policies should not detract from this protection or the ability to enhance these assets. Inconsistencies within the sub-regional policies on the protection given to the environment could lead to substantially different interpretations being applied by Local Planning Authorities to these considerations. In addition this open up the reverse argument that because a particular sub-regional policy fails to specify a particular environmental concern within its policies the concern should be afforded less weight. Such an interpretation would be unacceptable How the environment is dealt with in Chapter 5 varies considerably and we suggest that there needs to be a new policy within the plan which states: *In order to ensure that environmental protection is consistently applied throughout the region including the sub-regions the generic environmental policies contained in Chapter 9 will take precedence over sub-regional policies.*

Change sought

- **A consistent approach to policy across the sub-region.**

- **New policy SR1 *In order to ensure that environmental protection is consistently applied throughout the region including the sub-regions the generic environmental policies contained in Chapter 9 will take precedence over sub-regional policies.***

Thames Gateway/South Essex sub-region

TG/SE 1: zones of change and influence

Oppose

We support regeneration in this area, especially the emphasis on it being jobs led and improving job opportunities related to homes. We remain sceptical about how this can be achieved. Our concern centres on the difficulty in monitoring changes to job numbers especially relative to the rate of housing development, the infrastructure implications of the level of development and how strictly the approach in PPG3 to the sequential release of housing sites will be followed. .

We specifically oppose the proposed development of London Gateway on environmental and transport related grounds.

Change sought

TG/SE 2: employment generating development

Observation

We note that there is sufficient land already identified to accommodate the numbers of jobs proposed, although not all has been allocated and subject to public scrutiny. We are also aware that there are proposals to develop residentially allocated employment land, will this mean that land is in reality available to fulfil the requirements of the plan. We are concerned that this approach may undermine the “balanced approach” to jobs and housing.

Para 5.14. We are concerned that if LPAs are already trying to re-allocate, then the capacity will be less than 55,000.

TG/SE 3: transport infrastructure

Oppose

We are very concerned that a number of the proposed transport schemes are potentially very environmentally damaging: We are very concerned about support for the Lower Thames crossing due to the significant environmental impacts this would have - Its principal purpose would be to allow rail freight to bi-pass London. If built, however, it is likely to involve a major new rail route across green belt land. Further, if it provided for road traffic, it would require major new roads and intersections, including through the Thames Estuary and Marshes Special Protection Area and RAMSAR site and therefore raises major issues of conservation and environmental law. Indeed, it has been proposed in the context of providing for a London outer orbital route which we object to on environmental grounds. Such a facility would inevitably draw pressure for further residential and industrial development in the immediate vicinity. However, were the crossing guaranteed to be a rail only crossing, then it would be beneficial, particularly as a London freight bi-pass. It might be possible to develop existing track on the south side to link the crossing to the national rail network.

The upgrades to the M25, A127, A13 and links to Southend Airport would all involve major loss of countryside, a new or improved access to Canvey Island would adversely impact on the Green Belt land which is also of major importance for nature conservation. We believe that it is unlikely that sufficient funding will be available to ensure all schemes yet the level of development proposed requires significant transport improvements.

Achieving a modal shift away from private car use and towards public transport will require various

Measures to control traffic growth and make public transport a more attractive option. Many small scale and non-engineering measures can achieve very significant improvements in mobility and accessibility very much more cheaply than large scale infrastructure projects. Research undertaken by CPRE, T2000 and others, however, has shown that, despite their effectiveness and good value for money, opportunities to implement small scale solutions are frequently overlooked in favour of large, expensive infrastructure projects (*Valuing the Small: Counting the Benefits*. CPREW, CTC, Living Streets, Transport 2000, The Slower Speeds Initiative, Sustrans. October 2004), this undermines the objectives of reducing traffic growth and improving accessibility.

These are some of the schemes we would support

- Extension of Gospel Oak to Barking services to Tilbury. This would require no new infrastructure apart from new platforms at Barking.
- A north/south rail link in South Essex Benfleet to Wickford, joining the C2C line to the Shenfield/Southend line.
- Enhancement of the rail (passenger and freight) link from East London to Tilbury and Shellhaven. This route is currently served by the C2C service alone. We advocate entirely new track parallel to the current line.
- The 'Shenfield Curve', linking the eastern branches of the London to Chelmsford/Southend line, making direct access from Southend to Chelmsford possible.

TG/SE 4: the environment and urban renaissance

Support

We support this policy generally but would like to add reference to safeguarding existing valued local landscapes.

Changes sought

- **Thames Chase should be mentioned in the supporting text as it is already helping to achieve the aims of the policy.**
- **We would also like to see greater emphasis given either in this policy or a separate one, to the environmental implications for water supply and flood risk and defences of the proposals for the sub-region.**

TG/SE 5: community infrastructure

We support the principles underlying this policy.

TG/SE 6: dwelling provision

Oppose

CPRE East of England is concerned that the level of housing proposed will lead to the loss of countryside and Green Belt. It is surprising that Green Belt is not mentioned once in the policies or text dealing with the Thames Gateway South Essex. It should be regarded as a significant determinant of development levels and patterns within the sub-region. Any greenfield development here will be in the Green Belt.

TG/SE 7: implementation and delivery

Observation

We support partnership working and the genuine involvement of all stakeholders (including local residents and

groups). However, such arrangements should not be used to supplant the democratically accountable local planning authorities in the sub-region. We are concerned that the arrangements described in the text will neither deliver effective regeneration across the sub-region nor be properly democratically accountable.

We would have liked to see Para 5.26 as an integral part of this policy not just as supporting text as we believe that effective monitoring to ensure balanced development and adequate infrastructure provision in tandem with such development is absolutely essential. Monitoring the balance possible was done for the 2001 DETR report of the Thames Gateway Review. See PQs 214525 and 214524, Hansard 7 Feb 2005.

Change sought
Para 5.26 Add to policy.

Haven Gateway Sub-region

We do not support the expansion of Bathside Bay which will lead to significant environmental damage to an area which the Plan also wishes to develop the tourism sector.

HG1: economic development

Oppose

There is a great deal to support in this policy in terms of reducing out commuting and improving the balance of jobs and homes and we support regeneration of those areas which require it. However we are concerned about the likely environmental impact of the proposed jobs numbers which the draft itself recognizes is of value and should be safe-guarded. We are also concerned that the traffic generated will cause impacts on surrounding areas. We query the aspirational target for jobs as being unrealistic.

HG2: regeneration

Support

We support the regeneration areas proposed.

HG3: dwelling provision

We are concerned at the high levels of housing growth proposed for Colchester - a 16.6% increase over the current regional guidance (RPG9) derived rate. We are concerned that this will lead to the loss of Greenfield land around the historic town whose character is in part based on the visual relationship between town centre and the surrounding countryside.

Support

5.38 We believe phasing is vital to ensure that brownfield is utilised first and also we would like to see phasing related to the number of jobs available so that housing development is not allowed to run ahead of jobs provision, thereby exacerbating out commuting and regeneration problems. We believe this supporting text should be part of the Policy.

Change sought

Make 5.38 part of the policy and add phasing requirements to relate housing development to jobs.

HG4: the ports

We do not support the expansion of the Harwich port of Bathside Bay to which we remain opposed and which is intrinsically environmentally damaging the "proposal to reclaim 90 hectares of mudflats designated as SSSI at Bathside Bay, Harwich to accommodate four deep-sea berths" Para 5.40. The proposed compensatory habitat creation is no substitute to retaining the existing mudflats. We continue to maintain that this expansion is unnecessary given the proposed expansion at Felixstowe and the possibility of Shellhaven development.

We do support the paragraph which requires joint local development documents to be developed and implemented for the “management of impacts of expansion of ports” this does therefore recognize that there are impacts which need managing.

HG5: transport

Oppose.

We are deeply concerned that the first four road schemes listed - the A120 Colchester to M25, A120 east and west of Colchester and A133 corridor could all be potentially environmentally damaging and contribute to increased road traffic in surrounding areas. It is also regrettable that a quality bus corridor proposed is proposed between Colchester and Stansted rather than provision of a rail link.

We support the rail improvements particularly on safety grounds.

Change sought

Removal of road transport schemes A120-Colchester –M25, A120 east & west of Colchester, A133 corridor.

HG6: environment

We support this policy and welcome the proposals for the first European and Marine Regional Park and the augmentation of the Suffolk Coasts and Heaths area of Outstanding Natural Beauty. However we are very unhappy that policy and text have been amended in such a way that it is no longer clear that EERA supports extension of Suffolk Coasts and Heaths AONB to south bank of Stour estuary. This will weaken efforts to achieve this very logical proposal.

Suggest a simple word change to supporting text, “EERA continues to support proposals to extend...” (5.44)

HG7: implementation

We note that it is not suggested that this LDV is “open, transparent and democratically accountable” unlike those for Thames Gateway South East) and Stansted /M11 corridor. (TGSE7). **We would suggest adding this bullet point.**

Norwich sub-region

Our main concern with the sub-region principle is that it will be focussed on major urban and business growth interests and influence, to the extent that the interests of rural areas and the wider countryside will be submerged; this will happen whether the areas are within (treated as a “resource”) or without (suffering from a neglect in priorities) the sub-region. Our concerns are particularly acute in the Norwich and King’s Lynn sub-regions; but in all we have concern that no public consultation has taken place on the basis of or the definition of the geographical areas for which policies are to be made.

The Norwich sub-region now encompasses a very considerable area, a totally different proposition from the old Norwich Policy Area, and includes the market towns of Stalham, North Walsham, Aylsham, Dereham, Attleborough, Wyndmondham, Harleston and Diss; bringing in parts of North Norfolk and Breckland as well as Norwich, (extended) Broadland and South Norfolk. The practical long term impact of the proposal is that these market towns will become largely dormitory settlements for the sub-region focus. Clearly Norwich has a strong

natural pull as a substantial town in a relatively dispersed population, and there is a need to selectively develop growth, in particular in science based industries. But to add to this the ambition to make Norwich a major **regional** growth centre will mean that it will be difficult for the market towns to compete with jobs and facilities. In turn the rural hinterland of these towns will also suffer. There will also be induced many more traffic movements and over longer distances. It will run against the important Plan policy to nurture our market towns and the important role they must play locally.

Para 5.53. There is a powerful lobby which promotes “the poor road infrastructure” argument, and that more infrastructure equates to more jobs and economic growth in contradiction to the SACTRA report. This route takes us on to the spiral of non-sustainability, with the main outcome being more footloose development, particularly housing, more and longer distance car journeys, and “suck-out” of local economic interests. The main beneficiaries will be housing and road construction, and their associated industries.

NSR1: promoting clusters and strategic sites

Support

CPRE generally supports this policy as its focus is mainly on targeted “high-skill” growth, as we believe these both contribute to the local economy, and also help to obtain a better balance of job types and opportunities. But it does not necessitate a sub-region arrangement to drive this; nor should it be assumed they are per se on (road) transport corridors as opposed to good access by public transport.

NSR2: promoting the tourism sector

Support

In general we support this policy but, the emphasis should be on more environmentally sustainable tourism, with a higher economic return per visitor, rather than a growth in numbers. This could include a higher level of longer-stay continental visitors. The term “gateway” should not be code for a roads infrastructure agenda. With regard to signage (bullet point 5) Current levels of signage are more than sufficient. Signage should **not** be used as a means of advertising in the countryside, there is no case for an increase and we believe that signage if overdone can detract from the attractiveness of an area.

Change sought

We would add on the issue of signage in brackets to the last bullet point. “limited to the absolute minimum and only that which is in character with the area”

NSR3: retail, culture, leisure and education

Observation

We believe that there has and will remain a strong county role for Norwich for these needs, however by increasing its “regional centre” may result in more unsustainable car based journeys and detract from the role of the smaller market towns.

NSR4: housing

Oppose

CPRE does **not** support this policy. A driver for the Norwich Policy Area was to improve the balance and use of PDL between the City Council and the adjacent rural areas of South Norfolk and Broadland Councils; not for promoting urban or market demand business interests. This is more fundamental than the re-allocation of housing from 29,500 in the old NPA to 45,500 in the proposed NSR.

Para 5.62. CPRE objects to any major urban expansion north east of city. We object to a major urban expansion in the north east sector of the urban fringe linked to major transport improvements. This will be development on greenfield land, linked to developer contributions to a Northern Distributor Road. In addition, it is unlikely in that event there will be any substantial section 106 money for affordable housing

NSR5: transport infrastructure

Oppose

There are a number of public transport approvals in the policy which we warmly support. We would specifically add that these should include improvements between key centres in and around Norwich. This includes the rail and bus stations, the airport, main retail centres, the UEA, the Science Park, the Norfolk and Norwich Hospital. **However, we object to the total dualling of the A47 between the A1, Norwich and Great Yarmouth, and the Northern Distributor Road proposal.**

Oppose

Para 5.71. We object to a the Northern Distributor Route. We do not see it as an essential aspect of regeneration and would be against any major urban expansion in the north east sector of the urban fringe linked to major transport improvements. This will be development on greenfield land, linked to developer contributions to a Northern Distributor Road. In addition, it is unlikely in that event there will even be any substantial section 106 money for affordable housing

Change sought

Delete Para 5.71.

NSR6: environmental assets

Support

We support this policy that the proposal that the historic setting of the city be protected. Also that inappropriate development will be prevented in river valleys, areas of important landscape character and nature conservation value; this in our views rules out the construction of the NDR, particularly on the western half of all proposed route options.

Great Yarmouth Lowestoft Sub-region

GYL1: economy and regeneration

Support

We particularly welcome the proposals for a more diverse and environment based tourism sector, and urban renaissance using brownfield land development

GYL2: housing policy

Observation

We welcome the priority given to brownfield sites to aid urban renaissance also to the statement about phasing. The total housing provision looks to be too high if the priority is regeneration jobs need to come first for the existing population rather than ship extra population in. Monitoring will be important to ensure balanced growth. We hope phasing includes in relationship to jobs being forthcoming as well as for brownfield before greenfield.

GYL3: infrastructure and transport policy

Oppose

CPRE supports selected A47 improvements between Yarmouth and Norwich, but **not** the dualling of the Acle Straight which consultants report showed was environmentally damaging. We also support measures to relieve congestion on the eastern end of the A47, at the Vauxhall Road roundabout. But, object to an A47/A149 Link Road (there is a text typo it says A147). We support the various public transport measures; and an investigation/benefits analysis of a third river road crossing, on the basis that it could potentially separate commercial dock traffic from other vehicles, and release some previously developed land.

Change sought

Remove reference to dualling of Acle Straight

GYL4: implementation

Observation

Whilst we support most of this policy to ensure co-operation across the borders between counties we do believe that any implementation mechanism requires transparency and democratic accountability.

The Norfolk and Suffolk Broads Sub-area

NSB1: the Norfolk and Suffolk broads

Observation

We overall support the broad overall strategy for the Broads. But we question the appropriateness of promoting as the “green heart” of the north east of the region. We think Norfolk as a whole fulfils this role, and long may it continue. A “waterscape” description might be more apt for the Broads themselves. We reiterate the point that the concept of Norwich, Yarmouth, Lowestoft and surrounding market towns as a “gateway” should imply improved access by a variety of travel modes and not major road developments.

Thetford Sub-area

TH1: Thetford

Observation

We support the need for regeneration of Thetford but there is a danger in this policy of the idea that there are links to London. If we are talking about the concept of a roads-economy A11 corridor we would **object** to this. We support the prioritisation of town centre regeneration and re-use of previously developed land. We believe that employment should come before more houses.

Greater Peterborough Sub-region

GPSR1: strategy for Greater Peterborough sub-region

Bullet 4 CPRE endorses the provision of a university in Peterborough

We believe that EEDA has a role to play in taking the technology in the Cambridge sub region and spreading it north to Peterborough.

Bullet 8: growth of Whittlesey/Ramsey. The historic centres of the towns need to be protected. We believe it is important to consider the impact new jobs will have on traffic and commuting between the towns in the sub-region.

GPSR2: transport infrastructure

Object to the comment on road widening (Para 5.99). This is inconsistent with other sub-regional policies.

GPSR3: growth of Peterborough

No comments.

GPSR4: regeneration of Peterborough city

Whilst we support the regeneration of Peterborough City Centre we would like to add

To policy: bullet 1, add being ***aware of the dangers of peripheral out-of-town developments undermining the city centre.***

Cambridge Sub-region

CSR1: location of housing and related development

Oppose

Some concerns about the inclusion of Alconbury, and the development this would entail – current infrastructure is almost non-existent. We believe that there isn't enough coverage of environmental issues within the policy.

Change sought

Suggested amendments to the policy:

First sentence: after ...”and other facilities....” Insert: **..subject to environmental considerations and environmental constraints, including the risk of flooding..**

Bullet 4: add at the end of the sentence...”exists or can be **provided from the outset of the development**”

Last sentence: alter to read as follows: “Within Huntingdonshire, employment generation associated with the reuse of Alconbury Airfield may require some modification of this sequence **to secure a sustainable pattern of development, including the use of the airfield site itself for associated housing and support facilities.**”

The supporting text should be expanded to include flood risk, water, biodiversity and landscape.

CSR2: scale of housing provision and its distribution

Monitoring of the implementation and the balance of housing to jobs is essential; we do not support the need for any more than 46,800 homes.

The following wording should be incorporated into the policy: **there should be a balanced relationship, under the “plan, monitor and manage” approach, between jobs and housing. Need in relation to existing jobs should be met taking account of environmental capacity and not exceeding 46,800.**

A new spatial strategy policy should be included, along the lines of that for the Stansted/M11 region (ST1). The policy should include affordable housing (currently in the supporting text, 5.114); housing development; housing mix; protection from inappropriate development (i.e., Ouse/Cam valleys).

Change sought

See main text.

CSR3: high technology clusters

Oppose

Need balanced rather than just “high tech” community – importance of economic diversification.

Change sought

Suggested amendments to the policy: a final bullet point, reading: **the recognition of the importance of other industries in providing a balanced and diverse economy not reliant on high technology clusters.**

CSR4: management of the Cambridge sub-regional economy

Observation

“High technology” is undefined. Needs to be more discriminating – organisations should demonstrate a need to be Cambridge based, rather than just the kudos of the address. Consider strengthening the case for diversity.

CSR5: infrastructure provision

Observation

Suggested amendments to the policy: *in line 1:* "...including green infrastructure, which should encompass the protection and enhancement of biodiversity and the enhancement of existing fragmented habitats".

Change sought
See main text

Stansted/M11 Sub-region

Context

Oppose

Para 5.121 There is no clear geographic and economic connection between the areas identified as comprising the Stansted/M11 sub-region, and no clear justification has been given for selecting them other than that they form part of the Government's Sustainable Communities Plan. There are in fact two north-south transport corridors in the sub-region – the M11 corridor and the Lee Valley/ A10 corridor. The only real connection between them is the London-Stansted-Cambridge railway line, which follows the Lee/Stort valley. There is no justification for including the open area between Hoddesdon and Harlow in the growth area, and there are clear environmental reasons for not doing so

ST1: spatial strategy

Oppose

The first bullet-point makes much of housing development's being phased in accordance with employment growth, supported both by the second bullet-point of Para 5.123 and by Para 5.122's emphasis on 'employment-led growth'. The location of this employment growth is not specified, even if it is implicit that it is in the 'Stansted/M11 Sub-Region'. But the Sub-Region stretches for nearly 50km in length: housing located at one end to support employment at the other is not sustainable. So a more localised relationship between housing and employment growth is necessary to guide LDDs.

Also, no mechanism by which housing and employment growth are to be kept in balance is proposed. This is essential in order to provide Local Planning Authorities with a sound basis on which to formulate robust LDD policies through which this balance may be achieved and maintained. Para 5.126 again makes the point, but mere future review of RSS is too coarse a tool, since if housing and jobs growth get out of balance the damage will have been done.

Reference to 'economic and social regeneration' in the Upper Lee Valley (6th bullet point) appears to be a solution looking for a problem. If 'Upper Lee Valley' is assumed to run from Waltham Cross through Broxbourne District to Hertford and beyond (and it is not defined in the draft RSS), then there are little more than frictional problems in need of regeneration, and where these do occur they are more likely to be successfully addressed through urban renewal than greenfield development.

The proposed strategic restraints on development (9th, 10th and 12th bullet-points) are strongly supported, but we are anxious that these do not imply reduced protection for other areas of open countryside within the Sub-Region, whether benefiting from formal land-use designations or not.

We fully agree with the intention of draft RSS14 *not* to support a second runway at Stansted Airport, and also with the policy by which airport-related development should be located within the existing Airport site and that which is not directly airport-related should be directed to urban areas. CPRE does not, however, support further expansion of Airport passenger throughput beyond that covered by the existing planning permission, on the grounds of additional air pollution, noise, the combined environmental effects on Hatfield Forest SSSI and lack of adequate east-west public transport options

ST2: employment generation and economic regeneration

We support the principle of providing for job growth in the Sub-Region to meet local needs, but see little point in encouraging employers to move from existing established locations where they are already serving *their* local needs.

It should be recognised that all Regions seek additional employment opportunities but that, with only so many to go round nationally, not all aspirations will be satisfied. Competition between the English regions is to be deprecated

The proposal that LDDs identify at least two new strategic employment sites, as well as other additional large employment sites, is unjustified and undermines urban regeneration. The place for the majority of employment within the Sub-Region is within existing urban areas, being nearest to existing populations and thus more sustainable. (In many cases they are also attractive to employees, who are able to access shopping and leisure facilities at lunchtime and after work.) The claimed 'lack of market demand' in Harlow and Upper Lee Valley (Para 5.128) would be exacerbated. 'New' employment sites tend to be located out-of-town or edge-of-town with consequent reverse commuting and a higher level of employee car journeys. Such sites are also attractive to warehousing uses which, with their relatively low employment density and skills requirements, represent a squandering of premium land in this area. The words 'logistics and distribution' should therefore be deleted from Para 5.127. **For more detailed comments on Harlow, see our response to Policy ST3.**

Change sought

The last two paragraphs of Policy ST2 should be deleted.

The words 'logistics and distribution' should therefore be deleted from Para 5.127

ST3: Harlow regeneration

The first priority for Harlow should be for the town's regeneration, with maximum exploitation of previously-developed urban land, subject to avoiding the wholesale conversion of employment land to residential uses (see our comment on Policy ST2). The second priority would be intensification and renewal within the urban area, subject to reasonable protection of public open space and amenity.

Peripheral greenfield development, other than to a very limited extent on land already excluded from the Green Belt within or immediately adjacent to the Harlow built-up area, would undermine urban regeneration. Whilst the first bullet-point of Para 5.132 talks about 'packages of redevelopment and greenfield development', in practice the Policy does not provide a robust basis for LPAs to insist on 'brownfield first' policies in their LDDs. (By 'brownfield first', we mean *release* and *implementation*, not mere *allocation* in LDDs.)

ST4: strategic growth locations

Harlow

The proposed strategic development location north of Harlow is completely unacceptable for the following reasons:

- it represents a major incursion into the Green Belt, which is only about 2km wide at this point and specifically designated to contain the outward sprawl of Harlow into the surrounding countryside
- the Stort Valley provides a 'natural' boundary to the urban area
- roads and other linkages would have to be provided across the sensitive Stort Valley
- the danger of coalescence and loss of identity of the villages of Hunsdonbury, Eastwick, Gilston and High Wych, and possibly also in the future of Hunsdon
- The dependence of such development proposals on the provision of a strategic link road between the A414 and a new junction on the M11, passing through sensitive countryside.

Additional development locations south and west of Harlow similarly:

- represent a incursions into the Green Belt designated precisely to contain the outward sprawl of Harlow into the surrounding countryside
- result in a danger of coalescence and loss of identity of the villages/hamlets of Roydon, Halls Green, Roydon Hamlet, Broadley Green, Jack's Hatch, Epping Green and Rye Hill
- Would be likely to promote calls for a new distributor road between Jn 7 of the M11 and the A414 near Roydon, passing south and west of the town through open countryside and opening up access to yet more open land for future development.

The question has to be asked, where will the residents of new Harlow development work? Whilst a measure of new employment may be attracted to the town, it will almost certainly be insufficient to provide for an increased working population of the size envisaged in Policy ST4, even if they chose to work locally (which a proportion will not). Many will work in London, thus fuelling commuting and putting additional strain on both the M11 and the West Anglia railway line which is already working at capacity. Other employment locations (apart from Cambridge) are only accessible by road and public transport is unlikely to be attractive.

We note that the Sustainability Appraisal (p.23) states that the high quality landscape setting of Harlow should be protected. We concur: this recommendation militates against outward sprawl.

North Weald

Development of North Weald airfield is an opportunistic proposal which would require a major loss of Green Belt forming a corridor of open country between Harlow to the north and the Waltham Abbey-Epping-North Weald Bassett-Chipping Ongar line of settlements. Development on the scale proposed would represent an overwhelming of the present settlement of North Weald Bassett which would lose its character (by more than quadrupling its size), and put at risk the remaining open land between the airfield site, Junction 7 of the M11 and Hastingwood village. Major development on this site would also place unacceptable visitor pressure on the northern part of Epping Forest, especially that between Epping and North Weald, and on roads which pass through the Forest.

Far from enhancing regeneration and investment in Harlow, housing at North Weald airfield is more likely to be occupied by London commuters, despite the additional pressure on the public transport network. Station car parks at Epping and other Central Line stations are already full early in the day, with some commuters from the area already driving to Chingford main line station. We note that there is no proposal or requirement to extend regular Central Line services to a reopened station at North Weald, merely (in Policy ST6) a 'study of longer-term public access improvements'. The proximity of this site to Greater London would inevitably undermine regeneration efforts in a number of North London Boroughs, particularly Enfield and Haringey.

It is unlikely that many residents of a new development at North Weald will work at Stansted Airport: housing costs will be too high for most of the employment opportunities likely to be available at the Airport. Thus there is little or no planning relationship between Stansted Airport and the North Weald site.

Broxbourne/A10 corridor

The effect of adding another 2500 dwellings in excess of existing commitments in this area would be to develop on all open land in this corridor east of the A10, which includes stretches of wooded and rolling countryside east of Hoddesdon. The result would be to exacerbate an already 'linear town' all the way from the M25/Greater London boundary to beyond Hoddesdon. Residents of new dwellings in this area would be most likely to work in London (with its higher salaries) rather than locally, putting even greater pressure on already-crowded road and rail networks. Greenfield development in the Lee Valley would undermine regeneration efforts within NE London as well as making less attractive the redevelopment of local previously-developed land and buildings and opportunities for urban intensification. No 'special circumstances' have been demonstrated to justify the release of further Green Belt land in this area.

Braintree

The inclusion of Braintree in the 'London-Stansted-Cambridge' corridor appears to be merely on the basis of deprivation statistics in one ward of the town. The existing employment/housing imbalance could have been dealt with at LDD level, whereas the allocation of additional housing will only exacerbate the problem of out-commuting, particularly to London. Any significant housing development at Braintree should be contingent upon the *prior* provision of east-west public transport improvements.

Bishop's Stortford

It is unfortunate that it is now proposed that land to the north of the town originally allocated in the draft East Hertfordshire Local Plan as a Special Countryside Area with an emphasis on habitat creation, landscape improvement and public access be sacrificed to contribute to the provision of 'at least 2000 dwellings'. The allocation would make a limited contribution towards the housing of employees of Stansted Airport: the area's good rail links to London and Cambridge (albeit with important capacity constraints) are likely to make these two cities more likely commuting destinations.

E-W public transport in the area is poor, and even the 'high quality link' eastwards from the town called for in Policy ST6 is likely to be seen as unattractive in comparison with the recent and projected improvements to the A120. Excessive development at Bishop's Stortford is likely to create additional pressure for improvements to the A120 west of the town, with consequent threats to unspoilt valued landscape and tranquil countryside, and resulting in new roadspace being taken up by increased traffic rather than merely alleviating congestion and improving local amenity.

Uttlesford

The strategic growth allocated to the 'Great Dunmow area' is excessive and is out of proportion to the size of the historic core of the town. The option is given (Para 5.136) as an urban extension or a new village although, worryingly, the extension of an existing village is not ruled out. Coalescence or inadequate separation between the urban area and peripheral or adjacent villages (such as Takeley, Little Dunmow and Felsted) in the A120 corridor is an ever-present danger. The character of both the historic core of Great Dunmow and of the area's rural villages should be retained. The Area of Special Landscape Value comes quite close to the town.

Uttlesford has one of the highest concentrations of listed buildings in the country, contributing to the unique character of the area. This special character would be threatened by development, both of the Airport and of employment/housing on the scale proposed. Only a limited number of any new residents of the area would be likely to work at the Airport: the figure of c.20% of Airport workers from Uttlesford at present is unlikely to be replicated in new development. Housing costs in Uttlesford are generally high and most of the additional employment opportunities likely to be available at the Airport would be unable to support them. A likely scenario for the majority of residents of significant new residential development in the Great Dunmow area is commuting to London (by car, or at least by car to railway stations at Stansted or Bishops Stortford), with some road-based commuting to Cambridge.

E-W public transport in the area is poor, and even the 'high quality link' called for in Policy ST6 is likely to be seen as unattractive in comparison with the recent and projected improvements to the A120.

Changes sought

We therefore seek substantial reductions in the numbers of new dwellings over and above existing commitments in the locations specified in policy ST4 in order:

- **to avoid Green Belt release**
- **to minimise greenfield land-take**
- **not to exacerbate housing/employment imbalances**
- **to minimise both commuting and increases in road traffic**

— whilst meeting identified *locally-generated* needs, including for affordable housing.

ST5: Stansted airport

We fully agree with the intention of draft RSS14 *not* to support a second runway at Stansted Airport, and also with the policy by which airport-related development should be located within the existing Airport site and that which is not directly airport-related should be directed to urban areas.

CPRE does not, however, support further expansion of Airport passenger throughput beyond that covered by the existing planning permission, on the grounds of additional air pollution, noise, the combined environmental effects on Hatfield Forest SSSI and lack of adequate east-west public transport options

ST6: transportation

Oppose

Public transport enhancements should *precede* growth, and any significant development should be contingent upon its actual provision, not upon vague promises or on a 'wish-list' of schemes.

Bus, coach or so-called 'high-quality public transport links' should be integrated with rail services, including actually serving railhead stations directly, through ticketing, convenient and reliable connections, common information provision and timetabling.

We have a general concern, not limited to this sub-region but most definitely exemplified in it, about the creation of major new road space, other than to yield local safety or amenity improvements. It always ends up attracting more traffic, both a greater number of journeys and longer-distance trips. Additionally, road schemes tend to come forward more quickly than other projects, with the result that users who get 'weaned' on to the new road network are less likely to transfer to other modes if and when they are improved. [*This Para may be more relevant in response to the 'T' Policies in Ch 8 — MJB.*]
Change sought

Policy ST6, 2nd bullet-point: A second rail tunnel for Stansted Airport is urgently needed to serve the *currently-permitted* passenger throughput level, since this represents a bottleneck to increased rail passenger services.

The 4th bullet-point should be deleted (see our Response to Policy ST4, Harlow). CPRE emphatically opposes an eastbound extension of the A414 to the north of Harlow through to the M11.

Park-and-Ride at North Weald (**6th bullet-point**) would serve no useful purpose. Instead, it would abstract patronage from the proposed quality bus link between North Weald and Harlow. The normal conditions where Park-and-Ride is likely to be successful, namely on the outskirts of a congested town or city for travel into it, do not apply here. Park-and-ride at Harlow Town station is meaningless: improved station car parking would be a better requirement. Delete bullet-point as it stands.

Limit the quality public transport link proposed in the **7th bullet-point** to Epping-*North Weald-Harlow Town Centre-Harlow Town station, for onward connections by rail to Stansted Airport: in this way, further vehicles are not added on the M11. (N.B. * — only include a North Weald stop if development there goes ahead: this is without prejudice to our fundamental objection to the proposed development at North Weald airfield.)

8th bullet-point: Extension of the Airport rail branch eastwards to Dunmow and Braintree should be considered, with the potential to provide through services to the Airport from SE and E Essex.

9th bullet-point: See our Response to Policy ST4 (North Weald) about the potential extension of the LU Central Line from Epping to North Weald. NEED TO REPEAT TEXT?

11th bullet-point: See our Response to Policy ST4 (Bishop's Stortford) concerning improvements to the A120 to the west of the town.

13th bullet-point: A higher frequency of rail services between Stansted Airport and Cambridge is also necessary, with services provided over a longer day than at present. Better connections with long-distance services should be provided at interchanges such as Peterborough, Leicester and Nuneaton, and the through services north and west of Cambridge speeded up in order to make rail travel over this route more competitive and attractive.

Any expansion if it is to take place will welcome the public transport proposals, but we strongly object to the outer by pass to Harlow because of its landscape impact. If such a proposal is essential for the development proposed then this reinforces our view that the development is damaging to the area's landscape. We also have concerns about the proposed park and ride at North weald as this will further urbanize the site, a process to which we are opposed.

ST7: implementation and delivery

Support

We **support** partnership working and the genuine involvement of all stakeholders (including local residents and groups). We welcome the phrase "the work of the Partnership is open, transparent and democratically accountable" (**bullet 5**)

We believe that effective monitoring to ensure balanced development and adequate infrastructure provision in tandem with such development is absolutely essential this should be made clear in the policy. We wonder how realistic it is to expect developer's benefits to be shared across administrative boundaries.

Stevenage Sub-area

SV1: regeneration of Stevenage

Oppose

Proposals to support urban regeneration and to maximise urban capacity within the existing built-up area of Stevenage, by the re-use and redevelopment of previously-used land and through opportunities for selective intensification, are supported.

However, given that a decision on the outstanding Appeals for the site west of Stevenage are still awaited, we consider that its identification in draft RSS14 to be, at best, premature. The A1 (M) continues to represent an appropriate and defensible boundary to the urban area. Once breached, there is no further comparable physical feature to the west.

Green Belt has been defined to the west of Stevenage for the singular purpose of containing the outward sprawl of Stevenage. Notwithstanding that there is a small amount of land west of the A1 (M) within Stevenage Borough which does not have Green Belt designation, the Belt is in practice performing its function well and the case for rolling it back is not made. Furthermore, only a short distance away from the A1(M), this becomes an area of tranquil, rolling countryside undisturbed even by crossing roads, and any development approaching the brow of the hill would be visible from a considerable distance. Most of the land is designated a Landscape Conservation Area.

Land to the north of Stevenage is similarly designated Green Belt, in this case also for the purpose of protecting the sensitive gap between Stevenage and Hitchin and of maintaining the separate identity and character of the villages of St Ippollitts, Little Wymondley and Graveley. Part of the land north of Stevenage

(east of the A1(M)) is also designated a Landscape Conservation Area, and land adjacent to Graveley is rich in archaeological interest.

Stevenage may have good N-S communications in the form of the East Coast Main Line and the A1(M), but E-W communications are poor. Any attempt to improve the E-W road network is likely to result in major incursions into sensitive landscape to both E and W of the town. This adds to the argument that Stevenage is an unsuitable location for major growth beyond that represented by its urban capacity and identified *locally-generated* needs.

Once again there is a need to address the question of where residents of any new housing will work. Yes there will be some local employment opportunities, but London will continue to be the major attractor, with resulting pressure on both the A1(M) and the ECML. There is no scope for capacity increase on the ECML due to the constriction of Welwyn Viaduct; existing peak-hour trains are already overcrowded.

The figure of 14,400 dwellings for the Stevenage Sub-Area should therefore be substantially reduced to little more than the potential represented by urban sites, say some 4000 dwellings to 2021, or higher if urban capacity can accommodate it.

Change sought

The figure of 14,400 dwellings for the Stevenage Sub-Area should be reduced to little more than the potential represented by urban sites, say some 4000 dwellings to 2021, or higher if urban capacity can accommodate

London arc Sub-area

LA1: the London Arc

Support

We welcome the strong statements on Green Belt protection in this policy.

Bedfordshire and Luton growth areas

It is a matter of real concern that the existence of the MKSM strategy effectively prohibits consideration of this area within the East of England strategy. This needs careful watching, since the transport and housing implications of high levels of growth in MKSM and in the development areas within Eastern England could be very large. There is a danger that effects on Bedfordshire will be neglected in both strategies.

BL1: Luton airport

Oppose

CPRE is opposed to any expansion of Luton airport on environmental cost grounds. Luton accommodates a lot of the expanding holiday market which seems to be predicated on an assumed right to fly at almost no cost. We are particularly concerned that Luton housing figures plus present need means jobs are needed but little thought is given to any way, but via airport linked growth.

BL2: waste management in the Bedford / Kempston / Marston Vale growth area

Observation

Whilst generally good, needs to emphasize waste minimization more.

Bury St Edmunds Sub-area

BSE1: Bury St Edmunds

Supports

CPRE **supports** this policy we also note and endorse the issues surrounding the A14 and the junction.

King's Lynn Sub-region

KL1: King's Lynn sub-region

Oppose

We **support** the economic aims which form the bulk of this policy, and the access to local higher education facilities. We are concerned about 5.177 of supporting text which appears to support a dormitory role for Kings Lynn, this would not be in the interests of regeneration or sustainability. If there is to be significant district and public involvement, how effective and complete will it be for area which includes King's Lynn, Fakenham, Swaffham, Wisbech and Sutton Bridge, and their rural hinterlands; and how well will policy outcomes be monitored.

Change sought

Delete Para 5.177

KL2: exploring growth of King's Lynn urban area

Support

The potential for step change in housing delivery needs to be targeted on affordable housing as far as possible within the constraints of over-reliance on section 106 funding. The prime need is for further jobs for the existing population, so that in the context of job growth the overall provision of housing is balanced to meet and not exceed this.

KL3: regeneration of King's Lynn urban area

Support

We **support** the regeneration of the King's Lynn urban area. We look to see the South Lynn Millennium project (NORA) become a flagship project for the efficient use of previously developed land, high housing density combined with quality design encompassing sustainability principles and facilities. To this and we supported the construction of the Nar-Ouse Regeneration Road as releasing brownfield land and access for NORA.

KL4: transport infrastructure

We **oppose** on environmental grounds the dualling of the A47 throughout its length; and have major reservations on bypassing Middleton/East Winch and West Winch on this road, and the A148 Rudhams bypass.

6 economic development, retail and tourism

The linkage between economic and spatial strategies is welcome, and should be strongly encouraged. However, it might be hoped that there would be more critical evaluation of the economic models being used. Paragraph 6.3, for example, seems to be unclear as to what constitutes economic growth, suggesting that it can be generated simply by increasing employment. Although growth and employment are clearly linked, it is not obvious that one generates the other in any predictable way. It is also concerning that the other two factors identified here as being likely to enhance growth are education and improved transport. There is certainly a statistical link between education and economic success, but it is not a simple causal one. The link between economic growth and roads development has been effectively ruled out by the SACTRA report and EEDA's own Infrastructure Benchmark report (2000) and the environmental consequences of road developments are not positive.

While many of the other policies related to economic development are positive, it is not clear how they will actually operate, other than through processes such as "encourage", "support", "seek to ensure". In the face of strong private sector pressures, these may well be inadequate. A good example of this is provided by the reference to the expansion of Milton Keynes, in response to which "town centres in Bedfordshire will need to

respond to this impact by raising and upgrading their offer". Indeed so, but how will this be achieved by the Spatial Strategy or the MKSM strategy? However, the positive rejection of further out-of-town retail centres is welcome and long overdue. It is a pity that a similarly robust approach has not been taken with respect to airport expansion, which is almost welcomed for its supposed economic benefits, with surprisingly little attempt to restrict its environmental damage

E1: human resource development

No comment

E2: job growth

Oppose

CPRE East of England **does not support** the aspiration for an additional 421,500 jobs. We believe that the derivation of the figures is flawed and based on a target which is unsustainable. The target underlying the figures was arrived at from

- c) The jobs forecast from the enhanced growth proposals from the Bone Wells study prepared to determine how to meet the RES target to be in the top 20 regions in Europe by 2021, known as EG2021 which means an increase of "24%" of jobs in the region. (Answer given to this question in discussions by Scrutiny Panel 7th Nov 2003). The Bone Wells study did not take environmental issues into account.
- d) The final figure was derived using a "methodology of Enhanced Growth 2021 plus the communities Plan and regeneration aspirations to 421,500 jobs (ie.331,000 + 35,100 + 50,900+ 4,500) an increase of at least 90,100 over the existing EG21 projections" (Conclusion Para 66, Economic Development Task Group – working paper RES and RPG14 –Employment, Labour, Population and Housing 2021, Appendix Agenda Item 10 Regional Planning Panel 17th Oct 2003). We believe these figures are largely aspirational, and also that there is likely to be an element of double counting as we believe that EG21 took regeneration into account.

But not only do we think the figures aspirational the economy in the south of the region is in danger of overheating we cannot see how the East of England can gain a disproportionate share of the national jobs when at present the region has 12.5% of national jobs and if the Plans aspirations are achieved this we understand would equate to 21% of estimated national jobs by 2021. (Figures provided by Essex Partnership Steering group). Fuelling this by massive development will detract from the quality of life in this part of the region. Economic development must be geared to the region's environmental capacity.

The actual growth in employment numbers is actually outside the control of the planning system and if the planned jobs do not materialize we shall be left with development policies (particularly on housing) which will become unbalanced. Therefore there must be a link between the rate of jobs creation and the release of other forms of development. This policy is a predict and provide approach which will lead to premature allocation of employment land. This could also result in companies moving out of existing sites to new sites leaving the less favourable (perhaps older) sites empty or to an overprovision of sites which are not filled.

Any development must also be monitored so that it remains within environmental capacity, we are concerned that consideration of environmental implications is not mentioned at all especially the implication of the level of jobs growth, at the same time we believe that it is contradictory to government policy to reduce regional disparities.

Change sought

Re-examination of underlying assumptions.

Reduction in job growth targets.

Clear monitoring and triggering mechanisms.

E3: approach to employment land allocation

Oppose

We **support wholeheartedly bullet points 2, 3 and 4** of this policy and the emphasis on efficient use of existing employment sites.

However, we **have reservations** about the proposed level of land allocation, it is unclear from this policy what is being required through LDDs and therefore we are concerned it may lead to over allocation. A plan, monitor manage approach is essential and monitoring will be vital to ensure that over allocation does not occur. If the Region over-provides for employment land which is not then taken up, or alternatively employers are merely encouraged to move out of existing urban areas (including London), then little has been gained and much would be lost.

Change sought

Addition of the need for monitoring and phasing mechanism to be developed

E4: provision of strategic employment sites

Oppose

We **object** to this policy as it seems arbitrary, we do not agree with the jobs targets in E2 on which this policy is predicated.

Change sought.

Delete policy

E5: supporting economic diversity and business development

Oppose

We **do not support** to this policy as it is far to general and we do not believe that it adds anything to what has gone before in E3 and in fact may be contradictory to E3 in its effect.

E6: information communications technology (ICT)

Support

We **support** this policy and welcome the acknowledgement in this policy that, in supporting ICT industry there is a need to take environmental constraints into account.

E7: supporting cluster development

Observation

The expansion of existing clusters needs to have regard to the environmental consequences of so doing. The policy should be **re-worded** to make clear that expansion is only acceptable where there is no significant adverse environmental impact.

E8: simplified planning zones

Oppose

CPRE East of England does **not support** the designation of simplified planning zones, we do not see how any area effectively taken out of the planning system to be given special treatment avoiding planning controls can support the spatial strategy and may hamper planning aims in other areas. If the aim of the supporting text is to say that SPZs will only be put forward if required by statute why not say this in the policy.

Change sought

Delete this policy

E9: regional structure of retail centres

Support

We support this policy

E10: retail strategy

We **support this policy but**, needs to be more specific criteria and guidance on the interpretation on new

retail development being in scale with the size and character of a market town; and the consideration of a formal assessment of the impact on the local rural economy. The interpretation of national guidance favours the major global retailers, and the continuation of their expansion into the centres of market towns will destroy them.

E11: retail distribution

Support

Welcome this policy.

E12: out- of-town retail

Oppose

We are concerned that this policy seems to be encouraging existing out of town centres to become town centres in their own right. It seems to us that this could adversely affect the vitality and viability of existing town centres. In addition, most, if not all, out of town centres do not possess the urban environment that is normally associated with our regions town centres, being too car dominated in layout and utilitarian in appearance. It is difficult to see how such defects could be easily remedied. We would therefore want to **remove bullet point two from this policy.**

Change sought

Remove bullet point two from this policy.

E13: tourism

Oppose

Whilst we have no objections to the main thrust of this policy we are **concerned about the last bullet point** which appears to encourage development without any caveats regarding environmental protection and it also appears to ignore that fact that the main tourist “product” is the countryside.

It is ironic that tourism’s important role in helping to drive regional economic development could be undermined by proposals elsewhere in the draft which could damage the very assets on which tourism growth will in large part depend.

We support the need for the Heritage Coast to be protected from significant growth in tourist numbers. This is difficult to achieve in practice; and dualling of the A47 and a Norwich Distributor Road would inevitably bring increased pressures which would need careful management strategies.

Change sought

Delete last bullet point.

E14: regional airports

Oppose

We do not support further airport growth regarding it as inherently unsustainable as it is a major contributor to climate change emissions. **This view is supported by the Sustainability Appraisal.**

7 housing

Context

Oppose

Under the context we regard the statements in 7.1 as positive, but they fail to provide any opportunity to challenge the total figures for housing growth on which the whole document is based. At best, these are a way of mitigating the disadvantages of trying to achieve centrally imposed targets for housing growth. Given the serious implications for the environment of a number of the housing proposals contained in the plan it is difficult to reconcile these proposals with the statement that ‘ housing development must also support the regional economy while protecting the region’s environmental and ecological assets’, or with bullet point 9 on environmental considerations.

CPRE is very concerned that not enough work has been done on the issue of environmental capacity and quality of life implications of the levels of growth proposed. We do not believe that there should be loss of quality of life which would be the result with increased pollution and loss of tranquillity.

Some of the environmental impacts of new houses

According to Government figures, the building of **one** new home is responsible for:

- emissions of climate changing greenhouse gas emissions equivalent to 35 tonnes of carbon dioxide;
- production of 11.25 tonnes of solid waste; and
- Consumption of 60 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled).
-

Once it is built and occupied, this house is responsible for:

- emitting the equivalent of 4.05 tonnes of carbon dioxide gas per year through burning fossil fuels (but note this **does not** include fossil fuel consumption in transporting the occupants to and from their home in their day to day lives);
- producing 1.25 tonnes of solid wastes a year; and
- Consuming 180,000 litres of water per year (or 180 tonnes) and producing a roughly equivalent quantity of sewage effluent.
-

All of these figures are based on a typical 90 square metre new home meeting current (2002) Building Regulations and occupied by three people. (**Entec UK Ltd, Study of the Environmental Impacts of increasing the supply of housing in the UK, DEFRA 2004**)

Consumption of fossil fuels associated with the construction and occupation of homes will also contribute to air pollution – chiefly sulphur dioxide and oxides of nitrogen. Another important environmental impact from new housing relates to flood risk. If it is built on flood plains, then the flood defences that need to be built will have a range of environmental impacts – and could increase the risk of flooding elsewhere. Even if it is not built on flood plains, the rainwater run-off from extensive, impermeable surfaces (roofs and roads) can raise flood risks elsewhere. Finally, new housing can have impacts on biodiversity when it is built on areas rich in flora and fauna (for example, ancient woodland, permanent grassland or heathland) or when increased abstraction of water from rivers and aquifers affects aquatic or wetland ecology in the locality.

House builders claim that new housing does less environmental damage than older housing – it is built, for example, to higher energy efficiency standards. But of course it would only really cause less environmental damage if it **replaced** older housing. But it usually adds to the stock.

H1: distribution of dwelling provision 2001-2021

Objection is made to the level of housing proposed both for individual counties and collectively. Building on this scale will entail unacceptable loss of Green Belt, added congestion and strain on the infrastructure with the consequent substantial deterioration in quality of life for residents of and visitors to the County. The level of provision is significantly above that necessary to meet locally generated need including that for affordable homes.

We dispute the need for 478,000 net additional dwellings in the region over the period 2001-2021. *Policy H1* falls into the category of predict and provide. The overall housing provision is predicated on assumptions about net inward migration, decreases in household size and rates of economic growth, which we believe to be unrealistic.

The presentation in the Plan of overall housing figure was derived, according to the RPG14 Housing and Employment Alignment Report (R.Tyms & Partners August 2004) from the midpoint between two bookend

estimates arrived at by different routes.

1) The affordable housing route (CCPHR affordable housing study 2003) providing one bookend -24,200. This is based on an assumption of a need of 7,200 affordable homes to be achieved as a target percentage of market build (30%) plus an addition to take into account past underachievement to give the figure of 24,200. “(the need for affordable housing was then grossed up to calculate the total numbers of houses required to be built if the necessary numbers of affordable homes were to be required)” (Para 3.16 RPG14 Housing and employment alignment report August 2004)

This methodology relies very heavily on the assumption that:

- a) Market build will deliver 30% and makes no estimation of alternative funding routes or of site size limits.
- b) It does not allow for the fact that need may not be where the market housing will be built.

We believe it makes little sense as a way to estimate total housing provision in terms of actual need and location.

The Sustainability Appraisal section 4.4 says: “The reasons lower growth was rejected appear to be pragmatic and political: that Government would not accept it ...” We do not believe that this sounds like a Plan based on sound analysis of population, household forecasts and local needs, but rather that a figure was given (SCP requirements?) and then retro-justified. Well, in trying to do that, the numbers just don't add up.

The second bookend was jobs led and based on jobs growth targets, “the analysis estimated the amount of housing required if the labour force grew at a rate needed to fulfil EG21 plus jobs aspirations” (Para 3.16 RPG14 Housing and employment alignment report August 2004) This used a base jobs figure of 421,500, and provided a figure of **23,600**, EG21 means an increase of some 24% of jobs in the region (Agenda item 10b Regional Planning Panel 21st November 2003).

We are particularly concerned about the jobs derived figure given that:

- the original work which was used to develop the Regional Economic Strategy GVA growth target pointed out that there wouldn't be a big enough labour force in the region to meet the economic aspirations and we suggest that the level of housing is designed to accommodate this gap, by encouraging in migration above current levels.
- We regard the high level of jobs growth as largely aspirational.

Our third main concern, which we have already stated in SS13. Is over the underlying calculations of housing numbers based on population estimates.

If you take the 2001 population of 5,402,500: at 2.38 persons per household (as per **Para 2.12**), this equates to 2,269,958 households. The 2021 population is estimated to be 6,050,500 (i.e. 5,402,500 + 648,000), which at 2.24 p/h (also **Para 2.12**) equates to 2,701,116 households. Therefore the increase in the number of households on this basis from 2001 to 2021 is 2,701,116 minus 2,269,958 = 431,158.

You do not need 478,000 new dwellings to provide for 431,158 additional households! Even if you add in additional dwellings to house existing ‘concealed’ households, i.e. another 15,100 (the difference between 478,000 and 462,900 in **Para 2.12**), this is still **31,742 too many**.

This does not imply that we accept that the region should provide for a population increase as high as 648,000. A proportion of this number would itself be attracted by the provision of new dwellings in the region and would not move into the region if the houses were not built.

The SEA report also points out the Plan's ambiguity of purpose – “enable housing to catch up with jobs to address problems of shortage, affordability and commuting or to develop balanced communities with jobs and housing broadly in balance”. (p59)

*The report goes on to point out that **the same housing cannot do both** and if RSS14 achieves balanced communities it will not redress existing housing shortages and therefore government could seek yet more growth “a policy vicious circle”. (p59)*

The assumptions on which the figures are based need to be more explicit, there must be an audit trail back to the original work there needs to be a clear explanation of just what the Plan is trying to achieve. An appendix which details how they are derived county by county should also be provided.

Change sought

Reduction of dwelling provision numbers.

Supporting text

Oppose

Para 7.5-6 We strongly support the rejection by the Assembly, reflected in the draft RSS, of the additional 18,000 dwellings requested by the Government in the London-Stansted-Cambridge-Peterborough Growth Area, and agree that all growth should be subject to 'plan, monitor, manage' and the sequential approach (Para 7.5-6 refer). However, we disagree that 'capacity has been shown to exist', notwithstanding the two Studies referred to in the RSS footnote. To claim that 'capacity exists' for this additional level of development is a misleading statement without qualifying it by the environmental and sustainability impacts which it would bring. Capacity always 'exists' to the extent that it is physically possible to build almost anywhere, but the environmental capacity to absorb that development just is not there. We therefore oppose the need for an early review of the Plan to address this issue."

Para 7.9 This paragraph is disingenuous. While the dwelling figures may reflect the findings of the Hertfordshire housing development and special strategy audit, they do not appear to take into account all of the criteria set out in **Para. 7.1**. We do not accept that capacity has been demonstrated in Hertfordshire, outside the boundaries of established urban areas, especially at Stevenage and Harlow. Land with few direct planning restrictions other than Green Belt may be present, but that is a far cry from determining that environmental capacity exists, allowing for all direct and indirect impacts of development on these locations.

Para 7.10. It seems to introduce an entirely new meaning of the word sustainable, suggesting some sort of relationship between jobs, labour supply, housing and retirement in-migration, but it is not clear how this connects to whatever is meant by sustainable. It appears to be suggesting the housing is providing the labour and can't therefore be jobs led in Norfolk.

In particular in Norfolk the level of in migration and the holiday/second home factor appears to be at the expense of local need housing

Para 7.12-7.13 While support the principles expressed here, it is a considerable understatement to state that 'there are real challenges to securing these levels of housing supply.' In particular, the provision of infrastructure is critical. There are already serious pressures within the East of England on both transportation and water supply. It is crucial that there are set out clearly defined triggers between the arrival of infrastructure and the release of new housing.

Given that the Government has now indicated that it will not be releasing substantial funds to meet the infrastructure needs of the Plan, we draw attention to the statement in Para. 7.13 That 'the delivery of housing at this rate and scale is dependant upon timely delivery of infrastructure ...' and suggest that this is unrealisable within the timescale of the Plan.

Change sought

Para 7.12. Add to list: "**The increasing level of provision being identified elsewhere in the greater south east of England and London in particular.**"

Para 7.6. Delete the phrase 'While capacity ... shown to exist' and the last two sentences.
Set out clear triggers between arrival of infrastructure and release of housing.

H2: affordable housing and mix of housing types

Support

Para 7.16 -7.17 We note that the East of England Affordable Housing Study indicates the Hertfordshire and Essex London Commuter Belt as one of the areas where there will be greatest need for housing. By definition, this housing will create increased transport demands to cater for that commuting. Again, given recent Government statements regarding potential funding for the infrastructure required to cater for that demand, we do not envisage the infrastructure requirements to be met within the timescale of the plan, and hence the viability of the housing proposals for the growth area.

Para 7.17 Whilst we welcome the level of provision for affordable housing we feel that in some areas this may be too low and the target of 30% may need to be increased significantly. We object to the heavy reliance on this being obtained through planning gain route unless the target is significantly increased to reduce the overall housing requirement. There is a very large assumption that the planned level 7,200 dpa should be provided through local authorities being able to extract 30% of all housing as affordable housing (40% in particular areas given the levels of unmet need) but we are already seeing avoidance by developers using the 'exceptional site costs' get out clause to reduce planning gain, we do not believe that this target will deliver the required affordable housing and that significant alternative mechanisms for delivery and therefore funding provision will need to be available

H3: phasing of housing development

Support

We **support** this policy and if implemented would meet some of our concerns on ensuring infrastructure provision was timely and that regeneration was not prejudiced by the early release of greenfield sites. However, there is no corresponding policy on jobs or one linking the creation of jobs and the rate of housing provision. There must therefore be some doubts as to how the policy would work in practice, particularly where coordination was required across local authority boundaries and the need for affordable housing may push councils through planning gain considerations towards the use of Greenfield sites.

Phasing: We therefore recommend that the final housing total for the region as a whole and each local authority be split into 5 year phases, so that if conditions arose the 20 year allocation is not squandered in early years of the Plan.

In addition to the 5 year phasing consistent with plan monitor manage; the release of housing development locationally should be triggered by explicit employment growth in that travel to work area. It may be helpful to have a table such as in the London Plan (Table 6 A.1). Indicating average annual phases of growth in jobs and houses.

The consequences of not doing the phasing and triggering would be unrestricted increase in housing which would result in high levels of unsustainable long distance commuting

Change sought

2nd bullet: Should read "The re-use of previously-developed urban land and buildings..."

Phasing: The final housing total for the region as a whole and each local authority be split into 5 year phases, so that if conditions arose the 20 year allocation is not squandered in early years of the Plan.

In addition to the 5 year phasing consistent with plan monitor manage; the release of housing development locationally should be triggered by explicit employment growth in that travel to work area. Include table such as in the London Plan (Table 6 A.1). indicating average annual phases of growth in jobs and houses.

8 Regional transport strategy

There are major unresolved tensions within the Transport Strategy section. On the one hand the Plan is advocating, reducing the need to travel, multimodality, encouraging walking/cycling and improving public transport including rail and we welcome this as a step towards sustainable transport solutions. Then the good policies are totally undermined by other policies.

Firstly, the majority of the detail schemes cited involve continued improvement and expansion of road links and the Plan appears wedded to the notion (discredited by the S.A report) that the region has an infrastructure deficit. The majority of investment priorities to address this “deficit” are strategic road routes which will do more to encourage commuting rather than reducing it. It will do nothing to address regeneration needs or reduce our greenhouse gas emissions. Climate change is not addressed adequately at all in the Transport Strategy even though there is talk of demand management this needs to be more seriously addressed. The Transport Chapter needs to reflect changes since created last year including the coming into effect of the Kyoto Treaty

T1: regional transport strategy objectives

Oppose

This is potentially of enormous importance to the whole strategy, as it is one area in which serious public investment is involved, and where major decisions can be taken and implemented. CPRE East of England believes that the policy aims are laudable and we support them in the main. We are though not sure if in fact the Transport strategy has helped shape the spatial strategy rather it is being distorted in an attempt to meet the spatial strategy aims. There appears to be a change in emphasis on reducing the need and demand for travel, minimising environmental impacts and provision of alternative modes, to improving access to services (no limitations on mode are supplied in the objective) and the need for the infrastructure to support existing development, including addressing congestion and further growth.

It is also unclear how any conflict between objectives will be resolved in individual schemes. We are concerned that the plan proposes what will undoubtedly become London commuter suburbs to the north of Harlow and the west of Stevenage, feeding traffic on to the already seriously congested road systems in those areas.

Whilst **Policy T1** contains some very good proposals which we support, we cannot support it totally because of point 2. on the list. This in effect admits that transport will be allowed to grow unfettered to support existing and proposed development. This is “predict and provide” by a different name, whatever may be claimed in paragraph 8.5. Widening choice of modes is to be welcomed, as are the “promotion”, “encouraging” and “stimulating” of more environmentally benign modes. Stronger verbs would, however be more likely to achieve change.

We are also concerned that while policy T1 states that the objectives contained within it are in no priority order; in paragraph 8.2 widening traffic choice and maintaining transport infrastructure are both described as 'secondary' objectives.

The concentration on Regional Interchange Centres is welcome as one way of securing better inter-modal operation. There is one potential omission on the maps that could be of great relevance to Bedfordshire. At present, all the west of the county is effectively cut off from the East Coast main line, due to the absence of the proposed Bedford-Cambridge rail link and the total lack of coordination between express coach routes and the location of feeder stations on that main line. Development of St Neots as a secondary Interchange Centre could be of considerable benefit, and might support the development of the proposed rail link. This could also counter some of the likely growth in east-west road traffic from the Haven Gateway development. In this context, it is disappointing that the Bedford-Cambridge rail link, while shown on the map, is actually accorded a relatively low priority in the later tables, so that its inclusion on the map is rather misleading. Given the Strategic Rail Authority's failure to support the reinstatement of the continuation of this line from Milton Keynes to Oxford, it seems unlikely that they will support this much more ambitious proposal without considerable pressure at the strategic level.

We suggest that there should be another bullet point which includes reference to demand management. For example: **Actively consider demand management policies.**

As phasing is going to be vital to the sustainability of developments a bullet point on the relationship between

infrastructure and development needs to be included. E.g. **necessary transport enhancements should be provided along with other infrastructure ahead of the planned development to which it relates**

We believe there should be a greater emphasis on rail not road. Support for hard rail infrastructure provisions should be a priority. Wording to the effect that - **where there is opportunities for encouraging modal shift appropriate investment should be made.**

Change sought

T1 needs to better reflect the vision and objectives of the Plan.

New Bullet point: necessary transport enhancements should be provided along with other infrastructure ahead of the planned development to which it relates

New Bullet point: Actively consider demand management policies

T2: public transport provision and regional interchange centres

CPRE supports this policy

T3: strategic freight interchange

CPRE supports this policy. Provision of strategic freight must take account of environmental impact.

T4: ports and water transport

Oppose

CPRE supports this policy in relation to use of rail and inland waterways but we reiterate; we do not support expansion at Bathside Bay or development of London Gateway.

Change sought

Factual Change: Para 8.22The last sentence needs amending, it doesn't really mean "proportion of rail freight carried by rail" (all of it is!)

T5: airports

Oppose

We cannot support this policy, whilst CPRE supports any policy for developing sustainable transport. We reiterate; we do not support expansion of the airports beyond that currently approved.

The policy makes no mention of the adverse effects of airport expansion on congestion, vehicle emissions, noise and climate change, all of which result in lowered quality of life for residents across the region especially in those counties adjacent to airports. Is doubtful they contribute to the economy as they assist in a massive net tourism deficit.

The Plan does accept, paragraph 6.54, that 'airports give rise to serious environmental impacts on surrounding areas and overall increases in air transport usage contribute to global warming'.

Paragraph 8.27 includes Luton Airport among those having relatively good access provision, including rail access. This is not true Luton has a road link to the M1, but the new Luton Parkway station, built to serve the airport, still requires a bus shuttle service to get passengers to and from the airport. As a result, Luton Airport has a lower proportion of passengers using public transport to access the airport than London's other principal airports. The last sentence of paragraph 8.7 implies that if transport connections (including road!) to the airports (not 'airport' singular) were improved, further airport expansion would be acceptable and possibly desirable.

T6: strategic network hierarchy

Oppose

CPRE East of England is very concerned about the environmental impacts of the level of development proposed in the region and the growth in transport infrastructure that is required to support the level of development. .

Paragraph 8.35 is unconvincing in its statement that 'it is considered that the network identified (suitably enhanced) can support the likely demands of the emerging strategy for much of the region. We regard the term "suitably enhanced" with some concern given the extent of the transport infrastructure projects set out in table 8.3 A and B. The tables detail a very large number of transport infrastructure projects which despite many policy statements in the Plan about public transport and rail are in the main road schemes therefore, concern must be expressed about the impact both environmental and on the quality of life of those affected by them.

If the programme is examined against the status list on page 160 then the majority of schemes, committed or part of an endorsed transport plan, are improvements to road infrastructure. Many of the public transport schemes are still at the earliest stage of development i.e. proposed for investigation. For example on p165 where projects in the Thames Gateway/South Essex sub-region are detailed the majority of the road based schemes have funds committed whereas the three main public transport schemes are still at the stage where they are proposed for investigation.

There is no statement to the effect that the road proposals put forward are where there is no other option for transport provision. The public transport, rail and demand management projects have not been fully explored before providing extra road capacity is resorted to.

Of the schemes listed we are opposed to a significant number of them on environmental, social and other grounds.

The schemes we oppose include. (Not exhaustive list):

Northern distributor road – Norwich, on environmental grounds.

A421 between M1 and A1. Environmental grounds.

M1 widening proposals – encourage commuting and environmental impact

Harlow outer by-pass, this would cause harm to the attractive landscape of the Stort valley and intrude on the Green Belt

M11 dual 3 lane junctions 8-9, Visual impact in the landscape.

A12 dual 3 lane (M25 to Ardleigh interchange, Colchester) Loss of good quality agricultural land and harmful impact on attractive landscape, especially north west of Colchester. It is likely to intrude into Green Belt around Chelmsford and Brentwood and lead to loss of valued open countryside.

A 120 dual 2 lane Braintree to A12, This would lead to loss of tranquillity in the pleasant countryside between Coggeshall and Kelvedon/Fearing as well as take good quality agricultural land.

A120 dual 2 lanes Hare Green to Harwich, loss of good quality agricultural land. We doubt there is sufficient need for this route.

M25 dual 4 lane junctions 16 to 31, Visual impact - harsh urban features unsoftened within this landscape.

New access to Canvey. Adversely impact on Green Belt

A13 improvements (M25 to A130). Loss of countryside and Green Belt.

A127 improvements (M25 to A1159). Loss of countryside and Green Belt but also in places such as Basildon would bring road noise nearer to homes with loss of quality of life. The road is lined with a cycleway on each side which must be retained.

We have a general concern about the creation of major new road space, other than to yield local safety or amenity improvements. It always ends up attracting more traffic, both a greater number of journeys and longer-distance trips. Additionally, road schemes tend to come forward more quickly than other projects, with the result that users who get 'weaned' on to the new road network are less likely to transfer to other modes if and when they are improved

Para 8.36 We are very concerned about the apparent support for a lower Thames Crossing due to the significant environmental impacts this would have. We do not support the idea for a new outer orbital route

around London. The sustainability implications of a London Outer Orbital road would be considerable. Even if it started out in a modest way, once built it would inevitably become another M25, with induced traffic quickly filling up all available capacity and leading to pressures for widening. This coupled with land (largely Green Belt) newly opened up for development, and the threat to sensitive environmentally-designated sites and landscapes.

We also regret the lack of support for improved rail access to Stansted from the east as opposed to improved coach services.

Change sought

- **Significant re-evaluation of schemes proposed and a prioritizing of the public transport and other schemes before road schemes.**
- **Delete any suggestions or implication of an outer orbital road from Para 8.36.**

T7: strategic public transport services

Support

We support this policy but comment in paragraph 8.45 does however causes concern, as the use of a poorly organized bus service as a “test” of the demand for a new rail service could be a sure way of grossly underestimating such demand. The aspects of transport strategy associated with safety, accessibility, demand management and parking are excellent. These deserve the strongest possible support, as they are all areas where the fallacious arguments of the road lobby are likely to be deployed to increase road provision at the expense of other modes. A small, but important point that may need more stress appears at the end of *Para 8.87*. Current provision for station parking is a classic example of non-holistic thinking, where in most cases, car-parking providers are separate from the rail operators, and there is therefore no incentive for them to do anything to increase rail use. Indeed, their charging policies are generally designed to do the exact opposite.

T8: maintenance and management of the strategic road network

Support

T9: maintenance and management of the strategic rail network

Support

T10: sub-regional transport

CPRE welcomes the priority attached to investment in rural areas provided this is not used to promote schemes of new build or traffic management which damage rural character and the environment.

T11: environment and safety

Oppose

We do not believe that this policy is robust enough to prevent the claimed need for infrastructure developments where the environmental impact is unacceptable, we suggest as a first step that the word “protect” should replace “seek to protect”

With regard to paragraph 8.69, while fully supporting the need and the principle of changing travel behaviour, this will not happen in the short term and will not happen at all if there is insufficient investment in alternative forms of transport. There is no clear statement in the Plan as to how those alternatives are to be funded.

T12: walking and cycling

Support

T13: public transport accessibility

Observation

We believe EERA should set a target in rural areas to give something to work towards it could be the national base figure as a start.

T14: traffic management

Support

This will be beneficial if it can be achieved. Ideally in the main urban areas (where public transport provision is better and walking and cycling can be more easily promoted) one would like to see a more ambitious target.

T15: road user charging

Support

CPRE supports road user charging but believes there are so many qualifications to this policy that it isn't a policy at all.

T16: parking

Support

T17: investment priorities

Oppose

In this policy the reality of road domination becomes apparent. The overwhelming majority of the proposals are road-focused, in both the short and long term. Undoubtedly there is a need in some areas for local relief from the deleterious effects of road traffic, and this will be used as an argument to slip back into the predict and provide mode. The contrast between the eminently responsible policy statements and the detailed reality verges on the dishonest. How many people will actually check through the list of proposals and priorities, to evaluate them against the less populist aspects of the written strategy?

Paragraph 8.100 states that the timescales proposed reflect not only the ability to deliver but also when the schemes must be in place to support planned development. Given that EERA acknowledge that infrastructure investment is unlikely to be forthcoming as envisaged in this section of the Plan, we do not believe that the proposals can be realistically achieved within the timescales.

We are opposed to Para. 8.90 - 8.104 and those schemes in Table 8.3 already described under our response to T6

9 environmental resources

Much of this chapter is really good, but is weakened by caveats about the need to accommodate growth, or by phrases such as "whenever possible". This whole section should be much more prominent, and freed from the implications that environmental resources such as landscape character are some sort of add-on that can be sacrificed on the altar of economic growth

We support the principles for management of the environment in Para 9.1 but regret the blatant departure from those principles in the rest of the Plan.

Oppose

CPRE East of England **supports the principles** set out in **box 9.1** and believe this should be ENV1 the lead policy. It also includes the issue of light and noise pollution and this and other principles are not reflected fully in the policies which follow. Now that light pollution is to be made a statutory nuisance we need to include this somewhere in the Plan.

Bullet point 2: Protection and enhancement of nationally and internationally designated areas is a statutory

requirement and should not be qualified by “while meeting social and economic needs” this is irrelevant and needs deleting.

Bullet point 5 should be 1.

Change sought

- Make this Policy 1
- Bullet 2 Delete the words by “while meeting social and economic needs” this is irrelevant and needs deleting.
- Move bullet 5 to 1 this should be prime aim.

ENV1: environmental infrastructure

There is a need to deal with and see the environment as an integrated whole, rather than fragmented with separate components; natural, managed and built. A holistic approach to the environment is required throughout the chapter and RPG. This policy appears intended for existing urbanised areas and those new ones planned in the Sustainable Communities Plan. While we agree the need for provision of linking green infrastructure in such, it loses sight of the wider perspective of the greater part of the region as an existing green infrastructure called the countryside, from whose totality and integrity all green field development must necessarily detract

The terms “environmental infrastructure” and “green infrastructure” are not defined and it is unclear from the text what they mean. Therefore, the supporting text to the policy would benefit from making clear what all the potential functions of multi-functional green space are: e.g. exclusively nature conservation, primarily nature conservation with some access, informal leisure, urban open space, sports facilities etc, and to what extent different uses may be compatible and what uses may need the identification of exclusive areas. The supporting text to thy policy should make clear that green space infrastructure provision should be a key driver for the design and master planning of new communities.

ENV1 is a very broad brush strategic approach to the environment therefore fails to provide policies and safeguards for the very important small, rural and site specific measures which influence the character of the countryside and village settings and which will need to be identified through LDDs. The need for rural communities to have access to “accessible multi-functional green space” should be acknowledged. We would like to see some further guidance to those preparing LDDs on what they need to address, how will networks be established? What guidance does this policy provide for joint working?

Change sought

The word “protected” also needs adding to line one

Fourth bullet point: Cross reference to EMV3 and re-word **“Protect existing and newly identified biodiversity conservation areas and identify biodiversity enhancement areas to reflect ENV3”**

ENV2: landscape character

Oppose

Wholeheartedly support the “strongest levels of landscape character protection” But the policy needs some modification. The first paragraph should finish after ‘England’s finest landscapes’ and the list thereafter deleted. It is especially important that landscape character is a prime determinant when considering patterns of development and if such character assessments are to be used as a basis for planning decisions that the judgment of local people is of what is a quality landscape is taken into account.

In relation to the second paragraph we believe that the word **must** should be used to replace “**should**”. The paragraph should end with the word ‘*character*’– everything thereafter being deleted as the **first two paragraphs cover all the rest, these should be the policy.**

If however the second bullet point is retained, after “to ensure that” it should read **“all development respects and, wherever possible, enhances local landscape character”** This would render the final sentence in Para 9.8 unnecessary, there is no indication of whom is to be the arbiter of “overriding public interest”.

We view the last bullet point as extremely damaging. If there needs to be mitigation the development should not be there in the first place and needs to be relocated.

Para 9.5 supporting text should state that the predominant pattern of development in the region is of towns and villages set within an open background of countryside and that this characteristic should be retained.

Change sought
See main text

ENV3: biodiversity and earth heritage

Oppose

We believe that this policy should be strengthened, we have legal obligations to protect international sites and therefore we suggest that after the words Map 9.2, the rest of the sentence should be removed and replace with ‘will be protected’.

We suggest that the bullet points should be re-ordered the current sequence is illogical. Bullet point 1 should be 6. Delete 5 as it is covered under ENV1

We would also like to add at the end of 1 (re –ordered to be 6) the words - **which must be seen as an integral part of the policy.**

We welcome the expansion of wildlife corridors.

Change sought
See main text

ENV4: woodlands

Oppose

We have major concerns with this Policy.

We suggest deleting “semi-natural” in Para 2 as this means all woodland would be protected in line with Draft pps9. Also the word “strongly” is superfluous and should be deleted.

Given the first two paragraphs of this policy we cannot see how the first bullet point can be applicable as there is “a general presumption against the conversion of any woodland...” nor is it possible to replace somewhere such as Epping or Hatfield Forest. We therefore suggest that the first sentence of this bullet point be deleted and read “New Native woodland as defined by Forestry Commissions Bulletin 12 should be created.

Second bullet point, it may be entirely inappropriate to put woodland in certain landscape character areas. We would not like to see that woodland used to screen development as we believe that serious questions must be asked as to the appropriateness of that development in the landscape in the first place if this is found necessary.

We suggest this policy needs some revision; all the policies here could equally apply to other forms of habitat. A reference might be made to the value of hedgerows as wildlife links through the countryside.

There also needs to be consideration of ongoing management and advice.

Draft PPS9 draws attention to veteran trees outside ancient woodland these should also be protected.

ENV5: the historic environment

Oppose

Whilst we support the policy thrust we believe the list is unnecessary and the policy needs amending. Second line insert after 'identify' follow on with 'assess, conserve and protect' –line 5 and take out 'especially' and the policy should end with 'East of England'. We do not believe the list is necessary or exhaustive and suggest deleting it, focussing on just 2 historic cities is invidious. (What about Ely, Bury St Edmunds, St Albans, Peterborough etc) and there isn't any mention of castles, other military buildings, historic parks or gardens. Paragraph 9.19 needs to be reflected in the policy as should statutory listings by English Heritage.

Change sought

- **Second line insert after “identify” follow on with “assess, conserve and protect”**
- **Line 5, take out “especially”.**
- **End the policy with “East of England”**
- **NEW POLICY: *We suggest there should be a new policy dealing with the relationship between the natural and built environment covering such issues as landscape setting of settlements (touched on in passing in Para 9.19), open spaces within urban areas and their contribution to urban form and character.***

ENV6: agriculture, land and soils

Oppose

Whilst we understand that the EE Plan is not supposed to reiterate national policy, CPRE East of England believes that protection of high grade agricultural land (especially given the very high proportion of this national resource is in the East of England) should at least be mentioned in policy not just in Para 9.24 along with PPS7.

Bullet point 2, notwithstanding the above, raises serious implications for the countryside on rurally based farm diversification and its possible knock-on impact on country lanes and the general appearance of the countryside. Also, if large tracts of pasture and farm land, now used for agriculture and animal rearing, are reduced or seen as redundant to present use, it should not be assumed that this position will not change – all policies connected with land-based food production in the countryside should be reversible and the landscape seen as important for its own sake, not as a commodity to be used for irreversible development.

All schemes to support new on-site farm equipment, buildings and storage should be sensitively sited and accommodated after appropriate assessment. Rural lanes, their contours and verges, should not be upgraded to specifically meet the demands of this diversification but the diversification should be judged on whether it can accommodate the introduction without impact on the rural scene.

There needs to be reference to the impact on agriculture of the growth proposals in the plan as one effect will be that more and more rural areas will become affected by urban fringe issues which reduce the viability of agriculture and increased pressure for fragmentation.

The impact of climate change is also given too little attention in this respect.

ENV7: air quality

Oppose

Whilst we **generally support** the policy objectives there is nothing about noise pollution here and the policy is directed at road traffic and fails to mention air transport which is significant in the region. We would like to point out that the first bullet point clashes with the emphasis on expanding roads infrastructure in the RTS. The policy could be strengthened by reference to government's targets for CO2 emissions reduction.

Strong words are needed to support the cleaning up and improvement of air quality. If poor air quality already exists in an area earmarked for future development then the policy needs to be tightened to firstly reduce and manage it but if it continued to exist then further development would be refused. In rural areas account needs to be taken of local air fields.

Change sought

Bullet point four should be amended to read after "ammonia", **are expected to have adverse effect on the environment and cannot be eliminated or very significantly reduced.** (This should apply everywhere not just near SSIs etc)

Last bullet point "...seek to mitigate'... this is ambiguous we would suggest **seeking to reduce or eradicate...?**

ENV8: renewable energy and energy efficiency

Support

We welcome the requirement on developers to maximise efficiencies to be gained from sustainable design and construction, we believe that the first priority however should be reduction of energy demand and consumption (shown in Appendix C). Plans to produce renewable energy through whatever means will have some impact on the environment or on people whereas, a broad approach to reducing energy useage and improving energy efficiency will have beneficial impacts and in fact be much less controversial, the two issues are different issues and should be addressed fully.

We also welcome bullet (d) requiring the specification of locational and other criteria for assessing applications and we recommend that this set of criteria to determine planning applications include impacts on: **landscape, visual amenity, areas of significant ecological and historic importance, traffic, impact on residents. In particular we would welcome such assessments in relation to varying scales of proposed wind farm developments.** We consider that structures and buildings associated with renewable energy technologies need to be located where impacts can be minimised, the policy needs to reflect this.

Changes sought

- **Separate out the two issues of energy efficiency/demand management from renewables development.**
- **Add to d) the requirement that in the LDD criteria for location of renewable energy development that related structures and buildings should be located where impacts will be minimal.**

Supporting text

Observation

Table 9.2. We believe that there should be a much more discriminating approach to the location and setting of on-shore wind turbines and respect for our landscapes.

Para 9.36. Pleased to see reference to the Transport section where demand management would go a considerable way to educing carbon-based energy consumption. But needs also to refer to Housing design, SS16 and sustainable construction methods.

Para 9.38. Biomass and biofuels represent an opportunity but only if they can be shown to have a positive net energy output, taking account of the fossil fuel costs of growing, processing and transport, and to provide a true local economic benefit.

In relation to policy ENV8 Appendix C.

Oppose

Though this accords with draft PPS 22 and Government's announcements on renewables we believe that it should be strengthened in a number of ways:

- The lack of any real focus on energy conservation and minimisation must be highlighted and addressed not just in the finished building but in the process of procurement and construction a bullet point to that effect would be welcomed.
- We cannot support the last sentence in paragraph 3.1 (appendix C) and we are concerned that as worded the paragraph seeks to justify the development of renewables, on whatever scale, as a means of regenerating the rural economy, we do not believe this to be sensible. Delete this sentence.
- **Para 3.4** is too prescriptive and doesn't take account of alternatives and emerging facts and information on renewables.

Changes sought

**Needs more focus on energy demand reduction and efficiency improvements.
Delete last sentence Par 3.1**

ENV9: water supply, management and drainage

This policy would be better titled 'Water Conservation, Management and Usage' we also question whether the policy can be achieved given the lack of water in the region although we support its aims in particular on encouraging water conservation. On the issue of water sustainability we would question whether shortfalls in one area (in development infrastructure) should support areas where there is plentiful water in another, and how far it should be transferred given the significant energy costs and their knock on CO2 burden. The Policy as worded does not allow for sustainable issues to be examined and taken into account in relation to waste water disposal it also does not give enough emphasis to climate change impacts.. The sustainability issue must go across the whole argument of water usage and not just relate to supply. EIAs should address this issue when considering future development, and any lack of adequate water supply within a region should be seen as a reason to refuse planning permission.

We are concerned with the rather cursory treatment of water supply and sewage issues within the Plan. The Strategic Environmental Assessment pointed out that water is a major constraint on development in the region. To CPRE water is a strategic issue and we see that it should be a potential constraint on development in the region particularly in the southern counties abutting London. Climate change will simply exacerbate this issue. We feel therefore that water issues should come into the Spatial Chapter either as part of SS14 as a separate policy issue.

Change sought

**We would like to see a policy on water issues within Chapter 4 which includes the words:
Development can only proceed where there is an adequate water supply or where one can be made available in a sustainable way**

ENV10: waste management

CPRE East of England supports the principles set out in Box 9.2. However we query that the policy has enough in it about the land use implications of these aims. We also have a question on the status of the Waste Management Strategy (it did not go out to full public consultation), what will be it's status in development control decisions e.g. will it be part of the development plan?

ENV11: management of wastes arising within the East of England

Support this policy.

ENV12: regional self-sufficiency

We support these polices.

ENV13: hazardous waste

Observation

There is a significant lack of clear thinking among the different operators associated with waste disposal, with actions taken by one often creating problems for another and in general operating so as to discourage responsible waste management by the wider public. Bedfordshire's current proposals for very rigorous enforcement of controls on the use of waste management sites (to prevent any possibility of their use for disposal of industrial or commercial waste) are so couched as to make it difficult for domestic users as well. There are also serious presentational aspects, with public suspicion that materials supposedly being recycled are actually being landfilled.

ENV14: regional waste management strategy

Observation

We also have a question on the status of the Waste Management Strategy (it did not go out to full public consultation), what will be its status in development control decisions e.g. will it be part of the development plan?

Change sought

Clarification of statutory position of Waste Management Strategy.

ENV15: overall minerals supply and transportation

The Minerals Policies proposed do not appear to take into account or have regard to - existing workings or permissions, transportation issues, post-extraction and re-instatement and re-use. We question also how specific the "location" should be as it may compromise the outcome of a site specific planning application.

ENV16: minerals recycling/reprocessing sites

Support.

ENV17: overall minerals management

Support.

ENV18: sustainable approach to minerals planning

Support.

ENV19: minerals monitoring

Support.

We suggest "stakeholders" will include environmental and conservation interests.

10 culture

C1: cultural development

The general approach of this policy is supported. However, we are concerned that the policy is too optimistic in terms of using the planning process to ensure future maintenance of cultural facilities secured as part of development.

C2: provision and location of strategic leisure, sport, recreation, arts or tourism

Facilities

Observation

It is important that in considering "*regionally significant cultural development*" full weight is given to environmental impact both locally and wider. We suggest the addition to the proposals list: - **and take effective measures to avoid light pollution.** Unless this is covered in other policies.

Change sought.

We suggest the addition to the proposals list: - **and take effective measures to avoid light pollution.** Unless this is covered in other policies.

C3: the arts

The encouragement of public art strategies and design statements is welcomed.

C4: sporting facilities

Observation

Generally support this policy but it needs to have specific guidance resisting the loss of urban sports facilities and their replacement in the countryside, this causes both loss of countryside character and also loss of accessibility for users and generates traffic.

C5: recreation and natural resources

Oppose

We are concerned that this policy sees natural resources merely as assets to be exploited for recreation rather than for their intrinsic value and where recreation may not always be appropriate. The promotion of sport and recreation that rely on the natural environment is subject only to the caveat that these should not harm the "overall environmental quality of the location". The word "overall" should be deleted and the policy strengthened to give proper weight to safeguarding important natural resources and also tranquillity. There is also an issue of light pollution with regard to sporting facilities. Para 10.30 should be beefed up to give presumption against inappropriate development for all the countryside. It's not the value in recreational terms that is important but in environmental terms.

Change sought

Delete the word 'overall' and add after quality, "including protection of natural assets and tranquillity."
Para 10.30 should be beefed up to give presumption against inappropriate development that will cause environmental damage.

11 implementation and delivery

IMP1: conditions for success

We support this policy as it is essential that infrastructure in the widest sense is made available in a timely manner to serve new development. Where that development can be shown to be in the best local and regional interest. However, we have grave doubts that the necessary resources will be made available and in which case the policy should be clear that development should not proceed.

IMP2: development contributions

We **support the thrust of this policy**, however, it is accepted that there are limits to the amount that developers can contribute and public money will also be necessary.

IMP3: establishment of local delivery vehicles (LDVs)

We support partnership working and the genuine involvement of all stakeholders (including local residents and groups) and are under the control of the democratically accountable local planning authorities in any of the sub-regions. There needs to be full consultation on the setting up and remit of any LDV for any sub-region.

IMP4: monitoring

Oppose

CPRE has some major concerns over the issue of monitoring as we believe that monitoring of the Plan is vital to the successful management of part of the Plan Monitor Manage approach that is supposed to underpin the

Plan. No housing allocations detailed in this plan over and above existing commitments should be made until a robust statistically valid method has been provided to monitor targets set out in Appendix D number 4 on an annual basis.

At the very heart of the planning system is the ability to manage the process. Without robust tools to monitor progress at a sub-regional level attempts to manage the plan will be substantially deficient. The overarching spatial strategy of the plan is to try and bring jobs and dwelling locations into closer alignment to seek to reduce long distance travel. The monitoring of the targets briefly outlined in Appendix D number 4 are key to managing this and indicators of its success. Reliance on the 10 year Census analysis is therefore unacceptable. The Annual Regional Monitoring Report (04) recognizes this deficiency and suggests that Regional Assembly is in discussion with the Office of National Statistics and others to overcome this problem. However implementation of the Plan should not be allowed to proceed until these monitoring proposals have been subjected to detailed public scrutiny and approval.