



Campaign to Protect
Rural England

EAST OF ENGLAND

CPRE East of England's Response to EERA's Review of East of England Plan > 2031 Consultation, September 2009

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INTRODUCTION

1. The Campaign to Protect Rural England (CPRE) exists to promote the beauty, tranquillity, diversity and vitality of rural England by encouraging the sustainable use of land and other natural resources in town and country. The East of England Regional Group of CPRE operates at the regional and sub-regional levels and links with the CPRE branch in each of the six counties.
2. CPRE East of England welcomes the opportunity to respond to this Consultation. This Response addresses a number of over-arching subjects before going on to answer the formal Questions set by EERA, since these topics apply to any Scenario that may go forward as the Preferred Option. In any case, there is likely to be some duplication and overlap, although the attempt has been made to minimise this.
3. References in this Response are to the consultation document itself unless stated or the context demands otherwise.
4. All references to EERA also apply to the Responsible Regional Authorities (Leaders' Board and RDA) if and when they take over responsibility for the Regional Strategy from EERA.

OVER-ARCHING TOPICS

Providing for the appropriate level of growth

5. There are other factors which should determine the appropriate level of growth besides the demographic and household projections – not least environmental and transport capacity, and the CO₂ emissions implications of transport and construction. See also under the heading *Climate Change*, below.
6. The scenarios plan for an annual rate of growth, whether a roll-forward of the existing Plan or at a higher or lower rate, over a 20-year period 2011-31. This represents an over-simplification and does not recognise that growth rates are likely to be lower in the early years of the Plan as the economy climbs out of recession. Unrealistic aspirations in the Plan themselves bring the planning system into disrepute.
7. Part of the in-migration referred to in para 3.1 of the consultation document itself results from the availability of housing in the Region. It should mathematically be possible to analyse this component of demand in order to establish the level of housing appropriate to meet the Region's internal needs. *This data should be published as part of the evidence base.*
8. Household figures are highly sensitive to household size: small differences can make a large difference to the totals. Although average household size has dropped over recent decades, it cannot drop indefinitely and is likely to level out over the plan period. New household formation may not be at previous high rates, especially for young people, in the light of new economic circumstances. National immigration policy changes may occur. All this leads to much greater uncertainty than before, and the mere ploughing ahead with growth levels based on previous assumptions will not do.
9. Housing numbers are a proxy for total development. The land use for a given number of dwellings is not merely that number divided by density: there is a significant multiplier resulting from the need for all the supporting infrastructure, and the Plan needs to acknowledge this.

Plan, monitor, manage

10. It is essential that 'Plan, Monitor, Manage' underlies the Plan Review and not 'predict and provide'. The implications of the latter at both sub-regional and local levels are to commit plans and even land allocations to predictions well beyond anything that can be foreseen, with in some instances serious land sterilisation and blight consequences.
11. The usual argument is that infrastructure providers need this degree of advance notice. But the disadvantage of rigid planning for such a long time ahead is that it is very easy to get it wrong, as happened in the 1980s, and then if growth does not happen as predicted or the locational emphasis shifts elsewhere all that advance planning has to be undone. Plan, Monitor, Manage is just as appropriate at a regional level as it is at the local one, and the Plan needs much more flexibility after, say, year 10.
12. Phasing is a vital element in supporting the Plan, Monitor, Manage approach and particularly in ensuring that potential urban brownfield capacity is regularly reviewed and updated so that greenfield development is not brought forward prematurely. Previously-developed land is subject to a constant level of 'churn' and new opportunities are continually arising: we do not 'run out' of it.
13. *Monitoring* is key, especially of job number and location, PDL ('brownfield land') opportunities and commuting patterns.

New settlements and strategic urban extensions

14. We comment on the principle of new settlements here rather than in answer to Q.2, because we recognise that it is possible that one or more may feature in whatever preferred Scenario is chosen. We have, however, commented on selected specific sites in our answer to Q.2 on Scenario 2, below. Those comments, however, still apply if any of these settlements become part of any other Scenario.
15. New settlements require a long lead time and if any are to be identified in the preferred Scenario they should be timed to deliver towards the end of the Plan period.
16. In the event that it is proved to be necessary to include one or more new settlements in the RSS Review, they should be located on a railway line with a good service. However, if this primarily provides a good link to London then the settlements are likely to become mere dormitories and the objectives of a sufficient level of self-sufficiency (especially with regard to employment) will not be achievable.
17. All urban extensions and new settlements, if any, should be provided with a range of sustainable (i.e. non-car) transport from the outset by planning Condition, with bus services and cycle routes keying into existing networks and serving important destinations such as other town centres, hospitals and educational centres.
18. New settlements would undermine regeneration efforts if they were to be located functionally near 'underperforming' towns. An example of this would be Marston Vale, near Bedford, which, if it went ahead would undermine much-needed urban regeneration and employment in Bedford itself.
19. Similarly, any new settlements or major urban extensions should not undermine existing commitments. An example would be in the Cambridge area where a further new settlement could prejudice the delivery of Northstowe.
20. The eco-town standards should be promoted for *all* major new developments, including urban extensions, and not merely free-standing new settlements.

Green Belt

21. Existing RSS14 calls for strategic Green Belt reviews to allow for development to 2031. This was to comply with PPG2 para 2.8 which calls for Green Belt boundaries to be drawn (or, where they are reviewed, re-drawn) to accommodate longer-term development needs, such that further erosion of the Green Belt will not be necessary. Therefore no further boundary reviews can be justified in the present RSS Review, over and above those directly resulting from the May 2008 RSS14.
22. Repeated review of the Green Belt at each full or partial RSS Revision fatally undermines the concept of its permanence and that its boundaries are defined to endure (PPG2, ref paras 1.4, 2.1, 2.8).
23. The Sustainable Communities Plan (SCP, 2003) gives a commitment that the quantum of Green Belt in each region will be *maintained or increased*. CPRE has always held that Green Belt *location* is more important than *quantum*. We nevertheless call upon EERA to provide a thorough analysis of the net amount of Green Belt land expected to be lost through implementation of the policies in the May 2008 Plan. *In the Plan Review EERA should then propose compensatory Green Belt in order to comply with the SCP commitment.*
24. CPRE would be pleased to join with EERA in calculating the quantum of Green Belt lost or expected to be lost through boundary reviews since 2003, and in proposing general locations for additional Green Belt.
25. CPRE believes that new areas of Green Belt are justified on the basis of the PPG2 criteria for Peterborough and Norwich, and to complete a Belt around Chelmsford. We accept that boundaries would need to be drawn to allow space for development to 2031.
26. The existing Plan para 13.81 states that:

The roll forward of the RSS should also give consideration to a compensatory extension of the green belt in Mid Bedfordshire to the north of Luton.

We strongly support this proposal. It too meets the PPG2 criteria and is needed to protect the villages of Aspley Guise, Cranfield, Hulcote, Husborne Crawley and Salford from coalescence with the outward expansion of Milton Keynes. It would not be an isolated area of Green Belt but a natural extension of the already existing South Bedfordshire Green Belt which currently extends as far as the line of the Bedford-Bletchley railway.

Housing and employment alignment

27. The Plan review must take a stronger line on the alignment of housing and employment than the existing Plan. The failure to have robust policies on this will inevitably lead to more and longer-distance commuting and a greater tendency for urban extensions and other major residential development to become mere dormitories.
28. Because it is easier to plan for housing growth than to have any certainty as to the locations to which employers will be attracted, policies need to be in place which (a) tie housing and employment growth closely together and (b) do not direct major new housing to areas where employment growth is unlikely to occur on a sufficient scale or which currently suffer from high levels of unemployment.
29. The 'one new job per one local new dwelling' criterion for eco-towns would be a good target for the region as a whole in an attempt to improve alignment.
30. We recognise that the East of England already provides some housing for London commuters and that this will continue. However, little if any of the *additional* housing growth in the Region should be provided for London commuters, but primarily for indigenous growth.

31. The Consultation Draft Replacement London Plan Oct 2009, paras 2.3 and 2.11, proposes:

This Plan will make a significant contribution to this through its overall strategy of seeking to accommodate the substantial population and economic growth expected over the period to 2031 within the current boundaries of Greater London.

We consider this to be a sound strategy and we support it.

32. Notwithstanding this, the London Plan identifies two growth corridors in the East of England Region, one of which, namely London-Stansted-Cambridge-Peterborough, was designated as one of the Government's four Growth Areas in the 2003 Sustainable Communities Plan. However, we reject the identification in the draft London Plan (Oct 2009) of London-Luton-Bedford as a 'corridor of city-region importance' (Policy 2.3.1) or a 'strategic co-ordination corridor' (para 2.15). We do not comment on the obvious euphemisms, but it is not up to the Mayor of London to identify corridors or other areas outside Greater London for development or any other purpose. Beyond the Greater London boundary, the future of this corridor is entirely a matter for the East of England.
33. We insist on full transparency of the division of housing provision between that needed to remedy existing shortages, that to meet expected indigenous growth, that for out-commuters and that proposed merely to satisfy the desires of those moving into the region from elsewhere. *EERA should commission and publish a study of existing and projected commuting patterns*, both within the region and between regions, to inform debate on housing and employment provision. In the absence of such a study we would consider the evidence base would be materially deficient.
34. See also our answer to Q.5, below.

Transport

35. There are important transport issues in paras 4.22-26 of the consultation document do not address, nor are they given adequately treatment within the Sub-Area Profiles.
36. Strategic developments should not be located where they would be dependent on major but as yet uncommitted road schemes which may then never actually be delivered because of present or future limits to national funding. A mere 'wish list' of transport projects in the RSS Review is insufficient – indeed, it would be misleading.
37. The transport implications of the chosen Scenario(s) have to be set out in detail at the 'final draft RSS' stage. The existing Regional Transport Strategy (RTS) will have to be revised as a consequence and in the light of reduced funding.
38. The Review should contain a greater emphasis on improvement within the plan period of the existing railway network and services of regional and sub-regional significance for both passenger and freight, although, again, a mere wish-list should be avoided. The improvement of east-west links and the bridging of railway network gaps should be given particular prominence.
39. The RSS should call for explicit conditions to be attached to planning permissions for strategic developments whose prerequisite is the provision of transport (or other) infrastructure. Such close policy alignment between major developments and infrastructure is essential to ensure that they cannot proceed without the actual provision (not merely promises) of necessary supporting infrastructure.
40. Few large public infrastructure projects are likely to proceed during the first half of the Plan due to severe and prolonged restrictions on Government finances.
41. It is vital to shape travel behaviour from the outset in strategic development proposals, especially any major urban extension or new settlement. If practical and attractive non-car

options are not delivered until later then it will be too late, since conventional lifestyles and travel patterns will have already been established.

42. Similarly, demand management mechanisms need to be given greater priority, including where appropriate workplace charging schemes, congestion charging zones etc.
43. Existing RSS Policy T9 refers to non-motorised transport modes. The Policy, sound as far as it goes, should nevertheless be strengthened to encourage local authorities to link their fragmented segregated cycle networks. What we have at present are a number of isolated schemes implemented as new development or road improvement opportunities arose, together with some lengths of cross-country route e.g. along disused railways, but (with a few notable exceptions) little attempt to join these up into a comprehensive off-carriageway network for both leisure and urban use.
44. There should be greater explicit emphasis on the need to provide public transport options in rural areas.

Affordable housing

45. S.106 Planning Obligations did not supply anything approaching the planned level of affordable housing in the 'boom' times and is even less likely to do so in the future, since the conditions of the late 1990s and early 2000s will not return. Deliberate planning for additional market housing in order to deliver a given quantity of affordable housing distorts the housing mix. Alternative means of providing and financing the bulk of affordable housing will need to be sought. Because affordable housing is needed in the Region, then subsidised affordable housing should be built without a heavy dependence on market housing developments to provide it.
46. S.106 will in any case not be able to be relied upon to anything like the same extent in future. Claims of reduced viability of development schemes make affordable housing vulnerable to non-delivery. This will become all the more so as offsite s.106 matters transfer to the proposed Community Infrastructure Levy which will be compulsory and largely non-negotiable.
47. Thus we cannot agree with the optimism of the ISA Report (para 3.1.21) that

What is more certain is that delivering new housing will result in the associated delivery of affordable housing (assuming the rigorous implementation of LDF Policy).
48. The provision of affordable housing is difficult enough for needs arising within the Region itself. We therefore propose that little if any affordable housing provision should be made for those from outside the region (excluding minor boundary effects). As part of the supporting evidence base, *EERA should commission an up-to-date independent study of affordable housing needs within the Region* and relate proposals in the Plan Review to these.
49. It is particularly galling to learn that London Boroughs are purchasing affordable housing capacity in the Region in order to off-load their own problems. The East of England has affordable housing problems of its own to meet without having its capacity reduced in this way. This practice should be wound down as soon as possible and no additional affordable housing capacity planned to meet needs outside the Region.

Development in rural areas

50. Development in the rural areas of the Region should be of a nature and scale appropriate to those rural areas to meet local need, and not a convenient or less expensive option for that development which should be located in or adjacent to the larger urban areas. Proposals which would 'reverse commuting' should be avoided.
51. Both the employment and housing needs of rural areas are mostly smaller-scale and policies should aim to draw their employees and affordable housing residents from the local rural area.

Regeneration and previously-developed land

52. It is essential appropriately to exploit all urban land opportunities, with robust policy priority being given to ensuring 'brownfield first'. Lack of priority for previously-developed land undermines urban regeneration, as does continual expansion at the urban fringe. If regeneration is undermined, the quality of urban life suffers. Regeneration has wider positive impacts for society: it is likely to lead to the retention of residents and employers and to stem the 'flight from the city'. Existing RSS Policy SS2 should incorporate a sequential test in its 4th bullet-point.
53. The recent Report of the Committee on Climate Change (Oct 2009) says:
- A new strategy is required to ensure that land use planning decisions fully reflect implications for transport emissions (e.g. covering urban regeneration versus new out of town settlements). (Executive Summary p.11.); and
- There is a specific opportunity relating to the 3 million new homes that the Government envisages will be built in the period to 2020; locating these in urban areas would result in significant emissions reduction relative to dispersed locations. (Executive Summary p.26.)
54. Regeneration of coastal and port towns cannot be forgotten, but this has to be jobs-led and not housing-led.

Landscape and tranquillity

55. Assessment of the landscape impacts of development cannot be limited to the nationally-protected areas such as AONB, Heritage Coast and The Broads. There is much valued landscape of sub-regional and local importance.
56. We recognise that it is not a function of the RSS to designate protected landscapes such as AONB. Nevertheless, CPRE would like the RSS Review to recognise in its text the following particularly valued landscapes of more than local importance and which in our view are of equivalent value to AONBs, in order to provide LDFs with an appropriate context to seek their protection and enhancement:
- An area of North Norfolk, abutting the existing Norfolk Coast AONB.
 - The 'additional project area' adjacent to the Suffolk Coasts and Heaths AONB south of Ipswich in Suffolk and along the southern shore of the River Stour in Essex between Harwich and Manningtree.
 - An area E of Luton centred on Lilley Bottom, Hertfordshire, adjacent to the Chilterns AONB.
 - Greensand Ridge, Bedfordshire.
 - Upper Ouse Valley, Bedfordshire.
57. We endorse the conclusions (para 4.42) that further growth in and around Cambridge city and in the rural area of Uttlesford District would be harmful. But landscape is valued and diverse across the Region, not merely in these two important locations. The wider landscape impacts of much of the proposed new development should be recognised, and this should influence its nature, size and location to a greater extent than hitherto.
58. We are surprised at the admission (para 4.41) that "there is currently insufficient evidence regarding the sensitivity of urban fringe landscapes in the region". *Appropriate data should be provided as part of the evidence base.*
59. Whilst a soft edge to urban areas is preferred to a hard one, a clear policy distinction should be made between urban areas and the countryside (existing RSS para 3.36 refers). The urban fringe tends to attract urban uses (such as formal sports facilities, garden centres and other paraphernalia) which lead to gradual degradation and future calls for relocation and

redevelopment. And so the process continues. Existing Policy SS8 fails to recognise this problem and needs to be amended.

60. Tranquillity is to some extent subjective. Nevertheless, it is indisputable that whatever one's definition it makes a material contribution to quality of life. Much of the Region's tranquillity has already been severely undermined (see map at ISA Landscape Topic Report 9 *Landscape*, p.15), although fortunately there are still some notable areas, particularly in the Fens, Brecklands and in eastern Essex. But there are many local tranquil areas which due to their smaller size are much more vulnerable.
61. The Integrated Sustainability Appraisal Interim Report makes two brief references to tranquillity (Tables 2.9 and 2.11) but otherwise takes the subject no further. Whilst we welcome these comments as far as they go, we do consider the lack of further treatment in the ISA to be a serious omission which should be remedied in the next version of the ISA. Potential loss of tranquillity should be an important environmental indicator when evaluating both absolute and relative environmental impacts.
62. We note that the ISA Report (para 7.1.4) claims that

there is still insufficient baseline information at this stage to inform a meaningful discussion of likely significant effects with regard to some sustainability topics. For example, there is a need for more information regarding how biodiversity and landscape sensitivity varies across the region.

This gap has to be closed before the process of preferred options progresses much further. The data, when available, should not be used to justify the chosen Scenario but to inform the process.

Agricultural land

63. The permanent loss of agricultural land to development can only threaten food security, especially competition from the demands of biomass for energy generation and fuel products increases.
64. Land allocation decisions should give greater weight to agricultural land quality (ALQ), especially the 'best and most versatile' land. We note that the ISA Table 2.8 makes a similar point.
65. However, we cannot support the lame and indecisive approach to the protection of high quality agricultural land taken in para 1.5.15 of the ISA Topic Report 8 *Land*. Whilst we look to increase biodiversity, the fact that agricultural land does not always have the highest biodiversity value is not the point here, but the land's value for food production. This matter should be given higher priority.
66. Policies advocating strategic development locations and other areas for significant development should be assessed against ALQ criteria. Existing Policy ENV4 should be amended to reflect this requirement.

Water

67. The first sentence of para 4.31 in the full consultation document is very weak. Water scarcity has to influence both the extent and the location of development. Natural England is reported to have gone so far as to say that 'water resources should govern the scale of development in the Region'.
68. The average water consumption for the Region as a whole in 2007-8 was 156 litres per head per day. This is a long way from Level 3 of the Government's Code for Sustainable Homes target of 105 lphpd. Para 10.6 of the existing Plan notes that progress towards a lower daily average consumption 'will inform the next review of the RSS'.

69. Water efficiency measures will of course contribute especially for new buildings, but they cannot be relied upon in respect of the existing stock. So that, even if average Regional consumption *per capita* drops gradually, total consumption will continue to increase in line with the amount of new built development.
70. There is national concern at the depletion of streams and rivers as a direct result of high levels of water abstraction. In addition, low flows exacerbate pollution from run-off from hard surfaces and from agricultural chemicals.
71. The East of England is the driest Region in the country. The Scenarios make no proposals to meet the additional demand for water, merely pointing out the consequent 'water stress'. Existing Policy WAT2 has to be revisited to take a stronger approach.
72. Large-scale water transfers have huge energy (and consequently CO₂), costs and environmental implications. Introducing water from one river basin to another can also unbalance both chemical composition and biodiversity. These comments apply to any proposals to import bulk water supplies from the River Trent into the region from the Lincolnshire or Nottinghamshire area, for example.

Renewable energy

73. While wind energy can make an important contribution to tackling climate change, CPRE believes this should not come at the expense of the beauty, character and tranquillity of rural England. Wind turbine proposals have to be assessed for their potential impact on the landscape, taking account of their cumulative impact. CPRE will strongly resist those whose impact we consider to be unacceptable, whilst we have a track record of accepting those schemes which, by virtue of their scale, height and/or location, do not create significantly negative impacts for the countryside.
74. CPRE is also concerned about the noise element of some turbines. We are particularly mindful of the couple recently forced off their farm in Lincolnshire by night-time low-frequency noise from nearby turbines. However, tranquil rural areas, not merely dwellings, should be protected from artificial noise.

Climate change

75. There will clearly be more emphasis on climate change issues in the RSS Review than in the existing Plan. More is known about climate change than last time, the Stern Report has been published and the subject now has greater Government priority. However, mitigation and adaptation are mere compromises, and are no substitution for emissions reduction.
76. Construction itself is a CO₂-producing activity: the manufacture of materials; the construction process; materials transport; and wasted materials (for which the construction industry is notorious). The Empty Homes Agency (*New Tricks with Old Bricks*, March 2008) has estimated that an average new dwelling contains 47.5 tonnes of embedded carbon.
77. The occupation of buildings also generates CO₂: in heating and lighting (however efficient and well-insulated) and in the generation transport trips.
78. All of this points to the need for a cautious approach particularly to new housebuilding. Again, 'Plan, Monitor, Manage' would tailor new construction closely to its need and thus keep some control on this source of emissions.

Waste

79. CPRE recognises that there can be merits in regional or sub-regional energy-from-waste schemes so long as (a) their minimum economic throughput does not become a deterrent to recycling and (b) they do not give rise to long-distance road-based waste transfers.

Strategic planning for the Region

80. In order to avoid a multiplicity of strategic plans (and also confusion on the part of plan users), it is important that the Bedfordshire elements of the Milton Keynes and South Midlands Sub-Regional Strategy (MK&SM SRS) be subsumed into the East of England Plan Review. Following formal issue of the revised Regional Plan, the MK&SM SRS would then no longer represent policy for any part of Bedfordshire, and we would have a single spatial strategy for the area.

QUESTIONS SET BY EERA

The growth scenarios

Question 1: Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?

81. We believe that there has been insufficient stakeholder consultation in deciding which Scenarios to pursue and where growth should be directed in each. Even with given Regional growth levels to test, there are many ways in which growth could be distributed, and there is a conspicuous lack of evidence base to justify why these particular growth distributions have been chosen. Mere advice from the Strategic Authorities (some of which understandably conflicts) is insufficient.
82. It is a serious deficiency of EERA and of the s.4(4) Authorities not to include a Scenario ('Scenario 0') which provides for *lower* growth than Scenario 1. Otherwise the process is highly unbalanced. An inadequate range of Scenarios tested brings the planning system into disrepute and could make the Plan vulnerable to challenge.
83. 'Scenario 0' would be based on natural growth of the Region as at the start (2011) of the Plan period (nil net migration into the Region) *plus* that necessary to support net Regional workplace-based GVA at its long-term trend, i.e. not artificially stimulated.
84. A lower growth Scenario is likely to be much more realistic, given the knock-on effect of the current recession, even if there were a 'ramping up' in later years. It would also be more prudent: 'Plan, Monitor, Manage' would permit growth to proceed at a deliverable rate, given the present uncertainties. Higher growth levels, if justified and shown not to have unacceptable impacts, can always be restored in a further Review of the Plan in, say, 5 years' time.
85. The Consultation document states that advice from the Government asked EERA to test growth in the range of about 30,000 to 40,000 new houses p.a. This is compared to about 26,000 p.a. in the current Plan and past delivery of only 22,000 p.a. The Government considered that this scale of growth was necessary to stabilise long-term house prices in the region. This high level of growth would have no such effect: house prices are much more influenced by the availability and cost of mortgage finance. Furthermore, we do not believe that the construction industry is capable of delivering growth at this rate, and nor will the development industry wish to see the market 'flooded' in this way.
86. The development industry does, however, wish to see land *allocated* at a high level, in order to give them maximum flexibility in where they can choose to develop, for reasons of commercial benefit rather than sound planning.
87. CPRE fully supports EERA in that it would be totally inappropriate even to test the highest end of this range. This would almost double the rate of housebuilding in the region, above the highest rate seen over the last 50 years, and would rely on large-scale jobs growth beyond even the most optimistic projections.
88. Over-allocation of land is always presented as a 'safe way forward', but it has serious environmental, social and planning 'downsides'. *EERA should immediately commission an assessment of the risks of over-allocation and of its consequences.*

Question 2: Do you have any comments on the four growth scenarios?

89. We believe that the four Scenarios have been inadequately described with sections 4.1-44 being particularly 'thin', given the wide-ranging and deep impacts of growth throughout the Region. The consultation document is particularly deficient on the Scenarios' impacts on transport (just 5 brief paragraphs) and on commuting in particular (other than general remarks such as 'greater volume and distance of travel by car'), and on other elements of infrastructure. This lack of detail hampers an adequate comparison of the Scenarios.
90. The statements of detailed impacts are no better in the Sub-Area Profiles. Part 2 of these is given over merely to describing the *status quo* and has very little to say about the impacts of the Scenarios at sub-area level.
91. We remain to be convinced that there is a realistic *jobs* justification for the growth levels in any of the four published Scenarios.

Scenario 1

92. Even Scenario 1, approximating to a roll-forward of the existing Plan with some differences, is going to be difficult to achieve. The existing Plan requires major erosion of the Green Belt and does not relieve misalignment between housing and employment. It will result in increased travel and carbon emissions.
93. This Scenario's emphasis on the Key Centres for Development and Change (KCDCs) is the right general approach, although even this would necessitate further urban extensions, which are themselves incursions into open countryside and also into the existing urban fringe which is a valuable agricultural and recreational resource.
94. There must surely be limits even to concentrating growth on the KCDCs. A town or city can only expand outwards so much before it changes its character completely (this applies to market towns too). Furthermore, there comes a point where outlying suburbs are so far from the centre that it is easier for people to travel to other locations for their employment, shopping and leisure than to their host town or city.
95. An increased radius of the urban area of a town or city also eventually militates against the use of non-car transport modes as distances become too great for comfortable walking or cycling and buses get caught up in increased congestion in the town/city centre.
96. The statement in the consultation document at para 4.24 that "The overall objective of Scenario 1 will help to reduce the net distance and CO₂ emissions from transport if adequate alternatives to the car are available" (a) should not be limited to Scenario 1 and (b) is totally dependent on the "if" clause – and there are few signs that this will happen to a sufficient extent to offset the additional travel that growth will generate.

Scenario 2

97. Para 3.18 states that Scenario 2 considers the question "Which parts of the region have the capacity to accommodate significantly more growth than in Scenario 1?" The Regional-Scale Settlement Study appears not to have been guided very strongly by the location of Green Belt, generated levels of commuting, environmental impact or the avoidance of coalescence, for example.
98. We note the prediction that commuting distances are likely to lengthen with this Scenario. The emissions and congestion impacts of this will be less where the majority of commuting is by public transport (that is if the public transport network can cope), but not all travel generated by growth is commuting and the remainder is likely to be mostly by private car.
99. We have expressed concern under our 'New settlements' section (above) that new settlements could undermine regeneration efforts if they were to be located near to 'underperforming' towns.

We consider that this especially applies to the Marston Vale in Bedfordshire and its relationship with Bedford town. They will also increase commuting if housing and employment in any new settlements do not grow side-by-side.

100. Another problem with the Marston Vale proposal is that it would close the gap between Bedford/Kempston and Milton Keynes, leading to a 'linear town' along the A421 between these two established centres. There is much local opposition on this ground alone: it is a fallacy that the Marston Vale consists solely of a despoiled landscape – much of this area is conventionally farmed with scattered woods and villages. Furthermore, the developer's proposals for this area comprise a dispersed development rather than a compact settlement, with all the transport and sustainability problems which that would bring.
101. We have the following brief comments on other selected new settlement locations. CPRE County Branch submissions will contain more detail.
- A5120 corridor in Bedfordshire: Any major development here would have a serious impact on the Green Belt and could also negatively affect the Chilterns AONB.
 - Huntingdon/Alconbury: If Alconbury were chosen, its location close to Peterborough would undermine the prospects for urban and brickfields regeneration there and divert investment. It would be too far away from Cambridge to support that city's growth, and the proximity of the East Coast Main Line railway would be likely to attract London commuters making the new settlement a dormitory town.
 - South of the A120 (Essex): Whilst this location is close to the A120 dual carriageway, there is no railway linking Braintree with either Stansted Airport or Bishop's Stortford, unless major investment were made to link the two existing terminating branch lines. Any new settlement here would therefore turn out to be entirely road-based and would generate high levels of car traffic.
102. The above comments still apply if one or more new settlements become part of any other Scenario.

Scenario 3

103. Directing this level of growth towards the south of the Region (particularly Hertfordshire) would have a major impact on the Green Belt and for this reason alone would be unacceptable. Many authorities in Herts are, with the exception of any urban brownfield opportunities that become available, to all intents and purposes 'full up'. St Albans is a good example: it is simply not possible that that District could take 820 net new dwellings p.a. for 20 years under Scenario 3. Welwyn-Hatfield and Hemel Hempstead also have major problems in accommodating current growth.
104. This Scenario would certainly result in increased commuting to London.

Scenario 4

105. We do not believe that the exceptionally high level of growth represented by Scenario 4 can either be justified or deliverable.
106. This Scenario would exacerbate out-migration principally from London – a strategy that should be discouraged. Commuting distances would definitely become longer and these would for the most part be unlikely to be by public transport due to the more dispersed nature of the growth. This Scenario would increase new housing in locations where employment was less likely to follow.
107. The greenfield landtake in all the Scenarios is high, although Scenario 4 is likely to be worst not merely because of the higher growth level *per se* but because of its more dispersed nature towards towns with less previously-developed urban land.

108. Directing more growth to market and historic towns would negatively impact their character. There is evidence that this is already happening even under the existing Plan. We cite the two examples of Royston, Herts, which has become largely a commuter dormitory and St Ives, Cambs, which is in danger of losing its character. The historic city of Ely, too, is under threat from excessive growth.

Question 3: What is your preferred growth scenario and why?

109. We cannot endorse any of the four Scenarios set out in the consultation. We look for a Scenario which has *lower* overall growth levels than Scenario 1, for the reasons that we have discussed above.

110. Our chosen Scenario would have to meet (*inter alia*) the following tests:

- have minimal impact on a wide range of environmental criteria
- achieve close alignment between jobs and housing, in *implementation*, not merely in land allocation
- planned growth to run only just ahead of proven Regional *need* (not *demand*): ‘Plan, Monitor, Manage’ in action
- reduce the need to travel

111. We therefore advocate our ‘Scenario 0’, as proposed in our answer to Q.1, above.

The regional impacts of the growth scenarios

Question 4: Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?

112. We have answered this Question in our comments on each of the Scenarios, above.

A focused review of the Plan

Question 5: Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why?

113. The Vision and Objectives of the current Plan generally remain suitable for rolling forward. However, when actual planning policies and proposals are considered, conflicts with the Vision and Objectives immediately arise, calling into question their validity.

114. Some of the Objectives are not adequately carried through into actual Policy, for example para 2.2(iii), 2nd bullet-point: ‘improving the alignment between the location of workplaces and homes’. In fact, the first part of this bullet-point is the wrong way round: instead of ‘providing for job growth broadly matching increases in housing provision’ the Objective should be ‘providing for increases in housing provision broadly matching job growth’. We comment on this further under our section *Housing and employment alignment*, above.

Question 6: Do you have any evidence to suggest that policies other than those identified need to be updated or created?

115. A comparison of existing RSS Policies E2 and C2 demonstrates a difference that should not exist between levels of protection for areas of ‘ecological, landscape or historic value’. Policy E2 should be brought up to the standard of the 2nd bullet-point of Policy C2.

116. In existing RSS Policy E5 and its supporting text there is insufficient recognition of the need to support small-scale local retail in rural areas.

117. Tourism: Existing RSS Policy E6 should include a reference to the Region’s landscape in its 2nd bullet-point.

118. Policies T3 and T14 (in respect of demand management), T9 (non-motorised modes) and T13 (rural transport) in the existing RSS should be strengthened (see our comments on the subject of Transport, above).
119. We have also advocated changes to Policies SS8 (in respect of the urban fringe), T2 (changing travel behaviour), ENV4 Agricultural land quality) and WAT2 (water resources) in our comments on 'over-arching topics', above.

Supporting information

Supplementary Question 7: Do you have any comments on the sub-area profiles?

120. Apart from a few references to the Sub-Area Profiles above, this Question will principally be answered by CPRE's County Branches in their respective responses.
121. However, in general the Sub-Area Profiles concentrate less on the sub-regional *impacts* of the Scenarios and more on current planning policy plus (in Part 2) a number of useful area statistics. The sub-area implications of the various Scenarios are given relatively little space.
122. We note from Appendix 2 of the consultation document that the annual housing growth rate for Harlow (including its overspill into East Hertfordshire) would be continued for the whole of the Plan period under Scenarios 1-3. Allowing both for the fact that there are unlikely to be any completions for 'Harlow North' before 2011 and that there will be some PDL development within the town, this nevertheless assumes a further major extension to the Harlow North site beyond the 10,000 dwellings originally envisaged in the May 2008 RSS14. The identification of this major urban extension in the existing Plan is no justification for 'piling on the agony' and using this attractive part of the East Hertfordshire countryside as a dumping ground for yet more urbanisation.
123. We make one further point here, which is that any housing allocation for Central Bedfordshire arising from the eastwards expansion of Milton Keynes in accordance with the Milton Keynes and South Midlands Sub-Regional Strategy (which in any case we call, above, to be subsumed into the East of England Plan Review) should be clearly stated to be part of the totals in the revised East of England Plan and not additional to them. It would be totally unacceptable, compromising the role of the Plan, for development to take place in any part of the East of England Region which arises out of some other Region's allocations (in this instance particularly, the SE Plan).

Supplementary Question 8: Do you have any comments on the Integrated Sustainability Appraisal. Is there any further information that should be taken into account?

124. The Integrated Sustainability Appraisal (ISA) deals more with socio-economic matters than with environmental ones (with the exception of the Habitats Regulations Assessment). This is confirmed by para 8.1.2 of the Interim ISA Report:

The ISA has highlighted that the sustainability issues that should be brought to the fore when considering the relative merits of these high-level, strategic scenarios are those which relate to the socio-economic considerations.

Social, economic, environmental and natural-resource issues should all be given equal treatment in Sustainability Appraisal, and the downgrading of environmental matters is most unlikely to satisfy the requirements of the SEA Directive.

125. The ISA should have said that the range and choice of options was insufficient: see our answer to Q.1, above.
126. A weakness of the ISA is its concentration on the *relative* impacts between the given scenarios and less on their *absolute* impacts (c.f. ISA para 8.1.1). We believe that the sustainability (as regards the requirement for Sustainability Appraisal) and environmental impacts (in respect of

the SEA) of all Scenarios are so serious that absolute impacts should be given proper consideration.

127. The ISA Report does not address the *spatial* transport implications of the Scenarios (e.g. in 3.1.29-30, 4.1.15, 5.1.13 and 6.1.27).

128. Air quality: The Interim ISA Report states (Table 2.1):

Rural air pollution from Ozone is set to worsen with climate change, although there is little that can be done to address this within the scope of the RSS Review, as it is a transboundary pollutant.

This is rather dismissive! If all Regions took this line, nothing would change. The East of England should play its part in reducing pollutants, even though it cannot readily influence imported pollution from other regions.

129. Further references to the ISA Report will be found in other parts of this Response, above.

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