

**Matter 1A/ Government Office for the South East of
England (7447)**

Draft RSS for The South East of England -The South East Plan
Examination in Public - November 2006 to March 2007
Written Statement on behalf of HM Government - October 2006

1A.1 What are the key spatial strategy challenges facing the South East and is the response of the draft RSS adequate?

1A.2 Are the draft RSS's vision and objectives clear and appropriate? How will this vision of a healthier region be achieved?

1 The key challenge facing the South East, and one which is the crux of regional spatial strategy, is to maintain its national and international importance as one of the most successful regions in the UK, but to do so in a way which meets the principles of sustainable development. The parameters of the success and importance of the region, in economic terms, are well illustrated in the draft *Regional Economic Strategy 2006-16*, recently submitted to the Government by SEEDA. The principles of sustainable development are usefully set out in *Securing the Future – Delivering UK Sustainable Development Strategy* and form the basis of national spatial planning policy as set out in *PPS1: Delivering Sustainable Development*. Our initial response to the draft RSS included reference to some of the main elements of this challenge relevant to spatial strategy, which can be summarised as follows ;

- **The critical contribution of the economy of the region to the performance of the UK as a whole.**
- **Proximity to and socio-economic relationship with one of the most dynamic cities in the world.**
- **Regional response to population growth, age profile, household formation dynamics, and affordability, through the supply and management of housing.**
- **The intensity of use of the transport system**
- **The extent and richness of internationally and nationally designated areas of environmental importance**
- **The level of resource consumption and the production of waste**

2 We suggest that this challenge relates to 4 aspects of draft RSS ; housing supply (including its relationship with the economy and labour supply), sustainable communities, the provision of infrastructure and the response to climate change.

Housing Supply

3 To some extent housing supply touches on all the 4 aspects mentioned above - it needs to meet economic needs, be delivered in a way that contributes to creating sustainable communities, provided with the

required infrastructure, and built, designed and located so as to meet climate change objectives. However, in terms of the housing policies in draft RSS we have expressed our particular concerns about the adequacy of overall scale, the range of options tested in terms of scale and spatial distribution, and the underpinning demographic and economic evidence. These concerns emanate from the need for RSS to achieve, in the south-east, Government housing policy as set out in the *Response to Kate Barker's Review of Housing Supply (December 2005)*, the *Sustainable Communities Plan (February 2003)*, *Sustainable Communities - Homes for All (January 2005)*, and the emerging revision to PPS 3 - Housing. (*The timetable for the latter is not finalised but we undertake to assist the Examination as far as possible in taking account of the published Statement.*) Achieving a step change in housing supply, increasing the availability of social housing and improving affordability are the key areas of national policy to which this relates. Our position on housing supply and distribution is expanded in other EiP statements, particularly sub matters 1G, 1H and 2A.

Sustainable Communities

- 4 In addition to overall level of supply, integral to national housing policy is the delivery and creation of sustainable communities. The same housing policy documents referred to above set out the elements of a sustainable community and the UK Sustainable Development Strategy contains a summary of the key components (page 121). We have indicated in our response to the draft RSS that we support many of the cross cutting and individual policies which refer to elements of a sustainable community, but these are not brought together in a co-ordinated or integrated way as a feature of spatial strategy for the south east, demonstrating the multiple benefits that sustainable communities might bring. There is also no evidence that spatial distribution has been informed by these considerations, either regionally or sub regionally, or a regional strategy set out for planning authorities to make local decisions based on delivering sustainable communities.
- 5 Specifically on 'Health' and 'Crime', our comments in response to draft RSS, suggest that the regional strategy should consider how spatial policies might influence, for example, "entrenched regional inequalities in health", and how community safety issues could be woven through and integrated as part of the spatial planning process. A strategy relating to sustainable communities might be fruitful vehicle for achieving these objectives and demonstrating the wider benefits.

Infrastructure

- 6 The response to the Barker Review also sets out the importance attached by the Government to infrastructure provision, particularly in relation to the supply of housing, and this is reflected in PPS 12 on the content of development plans. As part of this response the Government commissioned a cross cutting review to co-ordinate across departments

the strategic delivery of infrastructure investment required to support additional housing which will inform decisions in the current Spending Review. Consultation on a Planning Gain Supplement has also been undertaken and a further announcement is expected towards the end of 2006.

- 7 Policy CC5 and the work undertaken by the Assembly to finalise the Implementation Plan and identify the infrastructure requirements of the proposals in draft RSS are welcomed as consistent with this policy. However we remain concerned that the approach used is over simplistic and, in some cases appears to treat the provision of new infrastructure as the direct and proportional result or requirement of growth. We consider that the relationship between growth and infrastructure is more complicated and interdependent, with both variations in the supply and demand for infrastructure potentially influencing, and being influenced by, patterns of growth. Our statements on sub matters 1E and 1D, and matters 3 and 10 contain more detailed responses in these areas, particularly on the Implementation Plan.

Climate change

- 8 We comment in detail on the treatment of climate change in draft RSS in our response to sub matter 1C, but want to record here that the Government intend to publish a consultation draft PPS on this topic before the end of the year. This may include specific requirements for the treatment of climate change in RSS.

1A.3 Is the draft RSS right to adopt “a cautionary approach” to growth over the long term, and to plan to meet the “reasonable needs” of the region? What is meant by the concept of reasonableness?

- 9 Our response to the draft RSS makes clear (Part A, p 6) that we are concerned about the cautionary approach to long term growth, and we set out a series of questions on which we welcome debate and clarification at the EiP. These questions are not repeated here but this debate will now be further informed by the draft RES (see above) and its evidence base.
- 10 We are unable to comment on the meaning of the concept of 'reasonableness' in this context and welcome clarification.

1A.4 Has the draft RSS been properly informed by Sustainability Appraisal? How can the recently completed Appropriate Assessment best inform the testing and finalising of the draft RSS?

- 11 We consider that the procedures and approach in the Sustainability Appraisal that accompanied the draft RSS are in line with regulations and guidance, and in our view the Assembly has used the appraisal

process to inform the draft RSS and helpfully demonstrate some of the trade-offs and issues surrounding the S E Plan. It is important to note however that the SA is an ongoing process and the soundness of the current SA needs to be considered at the EiP as recommended in OSDPM Guidance. It may also need to be revisited and revised if any significant changes are proposed to the spatial strategy following the recommendations of the Panel.

- 12 GOSE has been an observer at the independent SA Sounding Board and we consider that the Board has provided valuable feedback to the Assembly during the process.
- 13 On the matter of Appropriate Assessment of draft RSS, in March 2006 the Office of the Deputy Prime Minister wrote to all Regional Planning Bodies (Letter of 9 March 2006 from Lisette Simcock) about the application of Appropriate Assessment (AA) under Article 6 (3) and (4) of the Habitats Directive 92/43/EEC to Development Plans during the transitional period before the necessary amending Regulations came into force. The Regional Assembly subsequently confirmed to the Government Office that the Assembly would carry out an AA of the draft RSS and confirmed that it should be completed and available prior to the commencement of the EiP.
- 14 Subsequently DCLG has published "*Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents, Consultation Draft (August 2006)*". It has been written to accompany the amending Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations, which will now not become law until February 2007. This guide offers advice on how AA may be carried out and confirms that it is the responsibility of the RPB to ensure that the AA process is carried out in accordance with the Habitats Directive and the amending Habitats regulation.
- 15 The Regional Assembly intends to release a consultant's report on the Appropriate Assessment of the draft RSS and we understand that this will be made available to the Panel prior to the EiP, along with a report from the Regional Planning Committee. Given that the AA process commenced after the draft RSS had been published - understandably in view of the timing and the lack of clear guidance during the transition period - it will be important to establish whether the Assembly's approach to AA is satisfactory. The report makes a number of conclusions and recommendations about policies in the draft RSS, and so it will also be important to establish, during the EiP and advised by the Regional Assembly, what the implications are for the draft RSS, whether it affects its integrity and what recommendations for changes, if any, should be made.