

**Matter 1C/ 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

**1C.1 Does the Plan take sufficient account of the implications of Climate Change? Does Policy CC2 provide appropriate guidance to stakeholders on the measures that should be taken to mitigate the effects of climate change and to adapt to risks and opportunities, and is this guidance carried forward into subsequent policies, including on transport and renewable energy?**

1. Government believes that climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore, a priority and Government strongly supports the inclusion of climate change as a cross-cutting policy in the SE Plan. Government recognises that regional spatial planning has a role in influencing greenhouse gas emissions from development and land use, as well as help shape sustainable communities that are resilient to inevitable climate change.
2. Whilst the intention of the strategy is supported, climate change mitigation and adaptation measures could be better integrated and more explicit throughout the document. Whilst this integration has been partially addressed by the separate Climate Change Implementation Plan, the SE Plan itself still needs to clearly indicate how the policies and sub-regional policies will help the region mitigate and adapt to the effects of climate change. The relationship between the SE Plan, the Implementation Plan and the Climate Change Implementation Plan needs to be clarified and made explicit.
3. The transport section of the draft plan includes policies with sufficient detail (particularly T5 Mobility Management) to guide stakeholders on measures to take which will mitigate climate change and wider environmental impacts. The mobility measures are not quantified in terms of their effect making it difficult to assess whether they will deliver significant change. The opportunity to promote Local Authority action on road pricing, either region wide or in specific areas has not been taken.
4. The transport proposals in the SE Plan Implementation Plan are only set out to 2016 and the majority of measures are road, or other transport infrastructure. It is not clear what is proposed for the latter part of the Plan period, so it is not possible to assess the longer term opportunities and risks. The Implementation

Plan does not adequately demonstrate the alignment of transport interventions to delivering the cross-cutting climate change policy objective.

5. Minister of State for Communities and Local Government, Yvette Cooper MP, made a statement in June 2006 that Government **expects** 'all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables'. It is important that the development of the SE Plan is updated to reflect this most recent position.
6. More broadly cross references should be made in the Plan to the Three Regions Climate Change Group Checklist for Developers and the proposed Climate Change and Planning PPS, to signpost stakeholders to more detailed information on possible measures and considerations. Building on the Three Regions Climate Change Group's work the Plan should also better identify cross regional concerns and measures to address these in partnership where appropriate.
7. The SE Plan could also better consider the region's vulnerability to climate change and assess the strategy against future climate change scenarios, as provided by the UK Climate Impacts Programme. More needs to be done to scope the threats and opportunities of climate change in the region, linking these to other sectoral areas, such as tourism and transport.

**1C.2 *Is the regional target for the reduction in CO2 emissions appropriate and justified (Policy CC2)? Is it clear how this might be achieved, including the issue of not penalising new development while not addressing existing sources of emissions? Would it be appropriate to set additional and/or more specific targets?***

1. Government welcomes the setting of CO2 goals to act as an aspirational target for the region. However, the lack of adequate regional data to form the baseline is a concern, especially if the goals are to have a statutory basis. Currently Government is developing data at a regional level to give a 2005 baseline. This information should be available in 2007, however, if used it would mean setting a regional target based on 2005 rather than 1990 levels as drafted.
2. In the first instance Government would like the SE Plan to clearly set out how the region intends to work towards achieving its contribution to the national domestic CO2 goals. There needs to be a better indication of how the strategy will reduce the region's CO2 emissions. Whilst it is acknowledged that the spatial planning system can help deliver CO2 targets by implementing building standards, construction methods, setting energy supply requirements, reducing the need to travel,

efficient infrastructure and waste management; this only accounts for a proportion of the region's CO2 emissions.

3. Government recognises that the greatest impact on the region's CO2 emissions will continue to come from national policies and market forces. However, good practice examples across the UK have demonstrated that decisions at a regional and local level can play an important role in reducing emissions, improving energy efficiency and increasing public awareness.
4. If regional targets are to be pursued then the strategy will need to contain a clear outline of how the targets will be measured, monitored and implemented. Specific targets may be easier and more meaningful at a regional level, for example a domestic sector CO2 reduction target. More obvious links should also be made to the contribution of the Local Area Agreement process to reducing CO2 emissions, and promoting energy efficiency and renewables.

**1C.3 *Is the objective of stabilising the ecological footprint of the Region by 2016 and reducing it by 2026 appropriate and realistically achievable, bearing in mind the results of the Sustainability Appraisal (Policy CC3)? If not what changes are required?***

1. Government supports the objective in principle as it is consistent with the UK Sustainability Strategy priority to achieve a "one planet economy", by shifting to more sustainable means of consumption and production. The Plan does help deliver this objective by setting statutory standards at a regional level for resource efficiency in construction, by establishing sustainable building design and refurbishment of existing stock standards, and by promoting energy efficiency and renewable energy generation.
2. Whilst recognising the role of the Plan, the Government believes that this objective transcends spatial planning and that the Plan should not be the only regional vehicle to drive this policy forward. The Plan should work towards and help deliver the one planet economy objective but given the far broader remit of the ecological footprint, it needs to be an objective of all regional and local strategies if it is to be achieved. The SE Integrated Regional Framework provides a common vision for all regional strategies and a common means of evaluation, making it an appropriate instrument for this objective. The Plan, and other key strategies, should then demonstrate how they will contribute to this overarching vision and what measures will be put in place to address any negative impacts.
3. Whilst the Plan will increase elements of the region's ecological footprint it may be possible to offset these impacts elsewhere, and the Plan should not be viewed in isolation. Opportunities need to be identified across the regional policy framework and at

the local implementation level. A comprehensive ecological footprint reduction strategy should be agreed under the Integrated Regional Framework and cross-referred to in the Plan

**1C.4 Does the Plan set out a coherent strategy and set of policies that will assist in controlling and reducing the ecological footprint, particularly in respect of influencing behavioural change?**

1. As with the Climate Change cross-cutting policy the Plan could better identify the policies which will stabilise and reduce the ecological footprint throughout the strategy. In particular each sub-regional policy might include its own sustainability policy to address local issues, and to demonstrate how this cross-cutting policy will be implemented and delivered at the local level.
2. The Plan needs to clearly state why the policy options identified are more sustainable. Where policies will result in an increase of the ecological footprint, the Plan should justify why these measures have been included and how this growth in the ecological footprint will be redressed elsewhere. This includes making the appropriate cross-references to the Regional Economic Strategy, responsible for delivering much of the sustainable consumption and production agenda across business sectors; an area where the Plan itself will have less influence.
3. It is the Government's view that the Plan places inconsistent reliance on influencing behavioural change. For example, a great deal of emphasis is placed on the contribution behavioural change can make to meeting climate change objectives, where the plan has only a partial role. In contrast, the Plan is weaker in setting out measures on the transport side where it does have a clear lead role. In particular, it could place stronger emphasis on behavioural tools such as road pricing, restrictive parking policies, the use of imaginative spatial plans to reduce the need to travel, and a reprioritisation of travel modes away from private motorised travel towards much greater support for active travel and public transport.
4. However, the Plan cannot be solely responsible for the wider step-change needed to reduce the region's ecological footprint. Behavioural change will also be influenced by national Government policy, wider quality of life factors and individual priorities. Any behavioural change strategy to accompany the Plan would need to identify activities to deliver sustainable consumption and demonstrate how these will be implemented and measured.