

**Matter 2A 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

**2A.1 Is the spatial strategy clear and based on a reasoned approach? Have a sufficiently wide range of spatial options for accommodating new development (form and location) been tested?**

- 1 On the basis of the draft RSS section C3 the final iteration, before finalisation of the draft spatial strategy distribution, involved consultation on 2 spatial distribution options - a continuation of the existing pattern in RPG9 and a 'sharper focus' based on areas with economic potential and/or in need of regeneration for socio-economic reasons. In broad terms the essential difference in terms of proposed housing would appear to be that the sharper focus involves additional housing in the sub regions (other than the SCP Growth Areas and the Sussex coast) and a consequent reduction in the 'rest of county' areas (draft RSS Table C2).
- 2 Although the basis for the 'sharper focus' option is consistent with national policy, we suggest that this exercise does not represent consideration of a 'wide range of spatial options' in terms of form and location, particularly if compared with the range of potential approaches available, some of which are referred to below in response to sub matter 2A. 5. The text which follows at Section C para 3.3 does not clarify which of the two spatial distribution options was carried forward.
- 3 The 'preferred spatial strategy' as set out in Section C para 3.4.1 is clearly explained and broadly consistent with national policy (this statement also relates to 2A.2). However the Panel may like to examine how this strategy was derived, what options or alternatives were considered and discarded, and how the strategy was applied to produce a spatial distribution and relates to Policy H1.

**2A.2 Is the draft RSS's focus of concentrating development in urban areas appropriate? Is draft RSS's target of 60% of new housing on previously developed land sufficiently challenging (Policy CC8a)?**

- 1 The regional target of 60% of all new development on previously developed, or brownfield, land, in CC8a is a direct read across from national policy. We would therefore welcome an examination of how this target was derived, and whether it has any particular regional significance or is based on robust evidence. Although it may be more appropriate for a sub regional debate we would welcome clarification as to the contribution of large sites (such as the two Strategic Development Areas in the PUSH sub regional area) to the 60% target.

- 2 In addition to a regional target, it may be more appropriate for each sub-region to have a PDL target, as a contribution to the national figure, based on the surveys undertaken by the principal authorities referred to in the methodology used to determine housing allocations at D3 para 2.3. It is suggested that in several parts of the region figures in excess of 60% may be achievable and this should be encouraged where appropriate. The National Land Use Database, discussed at the technical data meeting, is suggested as helpful evidence to inform examination of this policy. The results of NLUD analysis illustrate that figures above 60% have been achieved, and that the supply of PDL is more robust than some commentators have suggested.

**2A.3 How do the spatial strategy elements, particularly the regional Hubs, relate to the Diamonds in draft RES, and to the potential Growth Points? Is there a need for a hierarchy within the Hubs?**

- 1 Draft RSS does not clarify the relationship between Hubs, Diamonds and New Growth Points, all of which have been identified as a result of different initiatives. A Table is being prepared which brings together the numerous designations of place, mainly from the draft RES and RSS. The Table demonstrates that the Diamonds in the draft RES align well with the existing Growth Areas and some potential New Growth Points. However a number do not relate to growth points, or only a small part of them do, such as Brighton and the Gatwick Diamond.
- 2 The Hampshire and Isle of Wight sub regions provide a good example of where the spatial elements correlate well and the synergies are good. Urban South Hampshire is designated as a sub regional area in the SE Plan, contains 2 regional Hubs and major economic centres, and is identified as a Diamond and a New Growth Point. Basingstoke & Deane Borough Council falls within the Western Corridor/ Black Water Valley sub region, is identified as a Diamond, a Hub, a major economic centre and a New Growth Point.
- 3 In view of this complexity and potential duplication we would welcome examination of the potential for a clear hierarchy and identification of roles. The RSS might also benefit from acknowledgement of the various regional designations in the RES ; a possible step towards integration that we referred to in our response to draft RSS.

**2A.4 Are the sub-regions identified appropriate and necessary? Does the draft RSS pay sufficient attention to the inter-relationship between sub-regions and the functional relationship between the sub-regions and other parts of the region and beyond? Is there sufficient recognition of the roles of districts outside the sub-regions?**

- 1 In our response to the draft RSS we raised our concerns at the inconsistency of approach to the sub regional sections of the RSS, the overlap with the core strategy policies and the lack, in some areas, of any sub regional specificity. We will not repeat our concerns in detail here but

welcome examination of these aspects of the sub regional policies, and testing of the coherence, functionality and distinctiveness of some of the sub regions.

- 2 One area which might benefit from more attention to cross sub regional relationships is the delivery of transport and joined up strategies. Transport is a key factor in delivery and in many cases this can only be sensibly provided on a cross boundary basis. Another cross regional issue is facilitating a broader alignment between employment and housing growth, informed by housing and labour market areas.

**2A.5 Hypothetically, if a case were made for higher regional housing levels, what would be the most appropriate approach to distribute the additional dwellings arising from these, taking account of economic, environmental and social implications.**

- 1 The Roger Tym Study, Augmenting the Evidence Base, commissioned by the Government, we believe would provide useful material on the varying apparent potential of sub regions to accommodate additional growth, and not the levels of overall growth selected and tested by the consultants.
- 2 Without necessarily implying any Government sanction or support for the approaches or techniques we suggest below several ideas for debate. If the Panel were to recommend any of these approaches the proposed changes stage and the accompanying strategic environmental assessment / sustainability appraisal will provide an opportunity to consult on how the Government responds to any such recommendations
- 3 Our suggested approach to distribute additional dwellings is to consider the following ;

**New Growth Points (NGP)**

The Government supports, subject to the statutory planning process including consideration by the Panel, the aspirations of a number of areas for delivering growth. A number of proposals were submitted to Government seeking potential New Growth Point status. In choosing New Growth Points as Partnerships for Growth, the Government is entering into a long-term relationship with Councils to support their objectives for sustainable economic and housing growth, including helping to ensure joined-up infrastructure delivery.

Potential New Growth Points have been identified in partnership with the local authorities, Government Departments (DCLG, DEFRA and DFT) and agencies. It is important to emphasise that this initiative is predicated upon local authorities and partnerships putting forward expressions of interest and bidding for New Growth Point status and, separately, for funding. Government

has made clear that New Growth Point Partnerships for Growth are subject to the statutory planning process, including Regional Spatial Strategies and Local Development Frameworks. The Panel therefore has a crucial role in testing the suitability of these areas to accommodate growth at the levels proposed in their New Growth Point bids.

The Panel will wish to note that, as conditions of Partnership for Growth with Government, New Growth Points are required to satisfy some generic and specific conditions, particularly relating to transport and the environment. Many of these conditions relate to ways of working with the Department for Transport, Highways Agency and Network Rail, and with Defra, the Environment Agency and Natural England, to ensure sustainable approaches towards planning for growth. Some of the conditions relate to carrying out essential studies such as Strategic Flood Risk Assessments, Water Cycle Studies to inform the statutory planning process and other decisions. The early, and in some cases final, outputs from some of these studies should provide evidence for the Panel to consider under sub-regional matters.

It is our view that the NGP initiative offers an opportunity for the RSS to deliver additional economic growth and housing in a focused way. We invite the Panel to examine the merits of each NGP, via the sub-regional matters, and consider whether to recommend inclusion of some or all of these potential NGPs in the South East Plan. A more detailed list of the South East Region New Growth Point Partnerships for Growth announced by Yvette Cooper and a copy of her Ministerial Statement to Parliament of 24 October have already been provided to the Panel Secretary.

To be eligible for consideration as New Growth Points, areas were required to agreed to a minimum 20% increase in new housing provision, over and above 2003 plan figures, between 2006 and 2016.

Not all potential New Growth Points are proposing substantial additional housing so much as maintaining existing housebuilding rates and taking a proactive approach to bring forward the early delivery of new homes. We would welcome the Panel's views on the longer term potential of the NGPs, which in some cases may necessitate considering whether longer term growth should be accommodated within their hinterlands.

### **Additional Growth Points**

We would wish the Panel to test whether the draft RSS has adequately explored the need for and the scope to provide new locations for focused growth within the region. This is particularly important given that the NGPs have come forward by responding positively to an open invitation. Therefore, there may be areas that missed the opportunity to propose themselves as NGPs, or are reluctant to explore the case for growth, that perhaps share characteristics with the areas that have come forward. In some cases, areas did respond positively to the invitation for expressions of interest in New Growth Point status, but were proposing growth at levels that did not quite meet the programme criteria. The Panel may wish to consider whether growth at levels that would correspond with DCLG's criteria would be appropriate in

these locations, and therefore whether their potential as New Growth Points should be recognised in the RSS.

The Government has indicated that if, once the process is complete, the RSS were to set out levels of growth significantly below those proposed by New Growth Point Partnerships for Growth in their bids, and DCLG's programme criteria, we would need to review whether or on what basis our partnership with those areas should continue. Similarly if, once the RSS process is complete, other areas are identified as New Growth Points in line with the Government's Partnership for Growth criteria, the Government would review the position then.

### **Accelerating Delivery**

It will be important to avoid a situation where the annual rate of housing provision in the region rises so slowly from current rates that reliance has to be placed on greater, and possibly unrealistic, acceleration later on. We are pleased that as part of the New Growth Points initiative some areas have proposed bringing forward new homes more quickly than would otherwise have been the case.

We consider early delivery to be a key strategic issue. Locational specificity in the RSS is potentially a means to help bring forward some housing sites earlier rather than later. This will serve to increase confidence about delivering whatever total provision will be needed by 2026. Appropriate opportunities may be significant in accelerating development. The draft RSS has taken this approach with respect to Fareham SDA and North East / North Hedge End SDA

Whilst PPS11 sets a general presumption that locational decisions should be made through the preparation of LDF core strategies rather than RSS, we invite the Panel to consider whether the following are circumstances where it might exceptionally be appropriate for the RSS to specify locations:

- Urban extensions and any new settlements where there will be particularly complex issues to resolve and so potentially long lead-in times;
- Cases where the most sustainable broad location(s) span more than one local authority area, or have significant local implications for more than one authority, and the resolution of difficult planning issues through joint local authority partnership working would benefit from a clear prior steer in the RSS;

For such locations, we suggested that the local planning process might be expedited if the RSS were to provide a clear steer to and policy framework for identified areas for strategic growth.

### **Existing Growth Areas**

The existing growth areas were identified in the existing RPG and are now well established with Local Delivery Vehicles (LDVs). The Panel may wish to explore whether the draft RSS has taken full account of the needs and full potential of these areas, particularly Kent Thameside.

### **Increasing Local Housing Capacity**

The draft RSS policies and other development plan policies will influence the amount local housing capacity that comes forward. For example, affordable housing policies will affect the viability of sites to be developed. Of course there are a number of other influences on the urban capacity that can come forward, such as local market conditions and land assembly. However, the RSS as a spatial planning document could set out different planning policy approaches and corporate attitudes towards providing new homes that could increase the amount of urban capacity that can come forward. For example, the RSS could promote the use of other land uses for housing and / or expecting Councils to proactively facilitate housing delivery, such as via land assembly.

### **Local Capacity Led**

Draft RSS has resulted in some areas' housing allocations being artificially low. Local planning authorities as required by PPS12 to submit their Annual Monitoring Reports (AMRs) to Government in December 2005 and will do so again in 2006. The housing trajectories in these AMRs demonstrate that the draft RSS has underestimated the existing commitments and capacity that is already identified in the region. A Table which demonstrates this is in preparation and will be submitted to the Panel as soon as possible.

### **Public Land**

There is an opportunity for public land to contribute to housing land supply and Policy CC6 suggests that there should be reviews of such land. We are aware that such reviews have already been undertaken by e.g. the Department of Health and Ministry of Defence, but these reviews can be sensitive. The Panel may therefore find that it may need to confine its consideration of public land to land that Departments have declared surplus and encourage Departments and their agencies to seek to include such land in LDFs at the earliest stage possible. The aim should be to avoid them relying on the planning system to deal with large brownfield sites as windfalls that the system is not designed to deal with.

All large sites for housing – whether publicly owned or not – should be positively project managed by LAs and relevant partner organisations. ATLAS can be a useful and experienced resource for LAs when faced with bringing forward usually one-off large sites. The Project Management Agreements currently being piloted by PAS/ATLAS might be a practical way forward.

### **New Settlements.**

Pending the issue of a new PPS3, paragraphs 72 to 75 in PPG3 set out existing Government policy on the potential role of new settlements. That text needs to be read in the context of paragraph 67. However, we look to the Panel to advise if there may be particular circumstances where a new settlement(s) would be a sustainable approach to long term planning.

Given that new settlement have leading times of several years their ability to close the, a 'gap' in meeting regional needs until the later plan period up to 2026 may be limited. But if a decision were delayed by several years until further reviews of the RSS and commencement of development consequently delayed then their ability to make a contribution will be lost