

8. SOUTH EAST PLAN - CONSULTATION DRAFT (DTS)

1. Purpose of Report

- 1.1 **The purpose of this report is to seek the views of the Committee on the South East Plan produced by the South East England Regional Assembly (SEERA).**
- 1.2 **Comments are requested by 15 April 2005. A copy of the Plan has been placed on the Members' Intranet site.**

2. Background Information

- 2.1 The Committee will recall that the Planning and Compulsory Purchase Act 2004 (PCPA) introduced a new planning framework for establishing policy guidance that, amongst other matters, will be used to guide the determination of planning applications. The old policy framework, referred to as the Development Plan, comprised the Surrey Structure Plan and the Borough Local Plan. These were set within the overall strategic framework of Regional Planning Guidance (RPG9) and other Government policy guidance. The new system comprises the Regional Spatial Strategy and the Local Development Framework (in combination forming the Development Plan) and these are again complemented by other Government policy advice. In the South East the Regional Spatial Strategy (called the South East Plan) has been prepared by the Regional Planning Body (a role undertaken by the South East England Regional Assembly). The Borough Council is responsible for producing the Local Development Framework (LDF).
- 2.2 The South East Plan (SEP) will be the statutory regional framework for development in the region to 2026, setting out the options for scale, priorities and broad locations for change. Although the policies in the Plan cover the whole of the South East, it also proposes a framework of sub-regional strategies, three of which affect Surrey - the London Fringe, Western Corridor & Blackwater Valley and Gatwick sub-regions. Runnymede lies within the London Fringe area.
- 2.3 Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes that influence the nature of places and how they function. Much greater emphasis is placed on the importance of implementation and, in particular, the importance of ensuring a co-ordinated approach to the delivery of investment in a timely and effective manner.
- 2.4 The PCPA emphasises more clearly than under the previous planning system that the policy guidance in the SEP or the LDF should avoid reproducing advice already set out in Government guidance (such as Planning Policy Statements and Statutory Instruments). In a similar vein the LDF will need to avoid replicating policy advice in the SEP.
- 2.5 Whilst the SEP is prepared by SEERA it will ultimately be approved and owned by Government. The Government Office for the South East (GOSE) will undertake a full formal consultation on the Plan following its submission from SEERA at the end of 2005. This will be followed by a Public Examination in Summer 2006 and approval by the Government at the end of 2006/beginning of 2007.
- 2.6 This report aims to highlight the key issues in the Plan and the potential implications for Runnymede. A key element, and probably the one to receive most attention, will be the options for growth in the Region over the next 20 years or so, and how this is represented in terms of housing numbers. The

Plan does not propose housing distributions at the District and Borough level at this stage, as this will be subject to a separate process in the late summer. It has recently been agreed by the Assembly that the County and District Councils will be requested to undertake the consultation on the housing figures as a local agent for SEERA.

2.7 A set of detailed policy considerations examined as part of technical consultations with other Surrey Authorities are set out in Appendix 'B'.

3. Policy and Technical Considerations

The relationship between the policies, the spatial options and the sub-regional strategies

3.1 The overall emphasis of the Plan's strategy is to focus development in the existing urban areas, with a target of 60% of new development taking place on previously developed land. Within this overall strategy, the Plan differentiates spatially between four different policy areas (Policy CC8):

- the Government promoted Growth Areas;
- Regeneration areas;
- Areas of economic potential;
- nine sub-regions.

Runnymede lies in the London Fringe sub-regional policy area and is an area of economic potential.

3.2 Alongside the overall strategy and policy designations, the Plan proposes two different options (spatial options) in terms of the way the South East should develop over the next 20 years or so. The first spatial option is based on a continuation of the strategy set out in current Government guidance, RPG9 (called continuing existing policy), which aims to reduce development pressure in the economic hotspots of the region, like Surrey, and boost economic activity and development in the Growth Areas and Regeneration areas. The second option (called Sharper Focus) promotes growth in all three areas - the hotspots, the Growth Areas and the Regeneration areas.

3.3 The Plan also proposes three options in terms of how much new development should be promoted in the region, using housing numbers as a proxy for the scale of development. The options are 25,500 (based on the actual build rate in the Region over the last 5 years), 28,000 (based on RPG9) or 32,000 (based on demographic projections) dwellings per annum for the Region as a whole. The lowest option was inserted by the Assembly when approving the draft Plan for consultation in November 2004. A higher option of 36,000 dwellings per annum, also based on demographic projections, was deleted at the same time. The two spatial options and the four policy designations have been used to distribute the three sets of housing numbers around the sub-regions resulting in six different housing options for each area.

Comment

3.4 ***The presentation of the growth options is very technical and may not encourage the public to respond. There does appear to be some contradiction in the policies, for example, the London Fringe is identified in Policy CC8 as an area of economic potential. However, if the 'continuing existing policy' option is applied, Surrey would be***

considered an economic 'hotspot' where development pressures should be constrained.

- 3.5** *There also appears to be a contradiction between the policies and spatial options in the Plan, and the draft sub-regional strategies. Of particular concern is the treatment of the London Fringe Sub-Region. The advice (and draft strategy) makes it clear that the sub-region should be treated as an area where urban intensification is already beginning to reach an unacceptable level and the Green Belt is most vulnerable. The main policy approach, should therefore be about constraining development; managing the impact of development better in the urban areas; and protecting the Green Belt (as already reflected in Policy CC9 of the Plan), as opposed to promoting further growth.*
- 3.6** *Much more clarity is therefore required around the relationship between the spatial options and the policies in the Plan and to ensure that there are no contradictions between the two. In doing this, it is vital that SEERA brings the strategy into line with the draft sub-regional strategies to ensure consistency in policy approach. The Council supports the level of growth set out in Policy LF2 that is consistent with growth option 1 (to continue the existing regional policy approach).*

Infrastructure

- 3.7** *The Plan (Policy CC4) recognises that all new development is associated with the type of social and physical infrastructure that communities need. This was a key issue raised in all the draft sub-regional strategies and has been highlighted as a major area of concern.*

Comment

- 3.8** *The scale of the infrastructure deficit is emphasised by a recent study commissioned by the South East Counties which estimated that up to £30 billion will be needed over the next 20 years to bring infrastructure up to the level that is required and support new development over the timescale of the SEP. It is of serious concern that even if the levels of housing suggested by the consultation draft could be accommodated in Surrey's towns, there would be significant doubt that the infrastructure needed to support this development would in fact be provided and indeed when it was needed.*
- 3.9** *Further work on this matter has been commissioned by the SE Counties and it is anticipated that this will provide evidence to show that there will not be sufficient money available to support the growth envisaged in the South East at any of the levels proposed. Indeed the Eastern Region has recently concluded the same and effectively put progress on their Regional Spatial Strategy on hold because of this.*
- 3.10** *Regardless of the figure at the end of the day, all the evidence suggests that the ODPM and others will continue to focus investment in the growth areas already identified, leaving little in the pot for other parts of the region which are nevertheless being asked to accommodate significant levels of growth.*
- 3.11** *If Policy CC4 is to be effective SEERA must demonstrate that the appropriate level of funding for infrastructure will be received for all areas.*
- 3.12** *The concern about the social and physical deficit is indeed sufficient for the Council to propose that further progress on the Plan is put on*

hold until such a time as the money needed to support growth is committed by the government.

The impact of economic growth on development patterns

- 3.13 The Plan assumes that economic growth is likely to continue in areas that have already experienced major employment growth in the last decade, hence the designation of places like Runnymede as 'Areas of economic potential'. As such, employment projections commissioned by SEERA have been used in the models for distributing the housing numbers to the sub-regions.

Comment

- 3.14 ***Whilst it may be accepted that economic growth is a key part of Surrey's and Runnymede's success and ongoing high quality of life, there are some concerns about the Plan. The SEP assumes that a) the areas that have experienced employment growth in the past decade will continue to experience it to the same level and in the same way and b) that by directing housing to the areas of economic potential to help them 'consume their own smoke', these areas will become more sustainable.***
- 3.15 ***The social and physical infrastructure implications associated with growth are not adequately addressed in a strategy. The Plan must also be much more flexible in the way it treats the economy and, in particular, must recognise that economic growth does not simply equate to employment growth and hence, housing growth right across the board. A different response will be needed in different areas. Particular emphasis should be placed upon the benefits of 'smart growth' that has the potential to increase productivity without requiring more land or an increase in jobs.***

Housing

- 3.16 The selected policy approach in the Plan will guide housing development within the London Fringe Area. The scale of this growth will depend on a number of social, economic and environmental factors. This relationship is still being developed, but the potential impact on Runnymede could be significant.

Comment

- 3.17 ***To achieve some of the higher levels of housing growth in Surrey it will be necessary to maintain and even exceed the current high levels of housing development. However, this increased capacity is being currently delivered through higher densities, loss of other land uses and is placing increasing stress on infrastructure in the urban areas. There are clearly genuine concerns about the longer term impact this will have on Surrey's towns if this strategy continues.***
- 3.18 ***The issue of intensification in urban areas cannot be divorced from the social and environmental considerations elsewhere. If quality of life within urban areas declines to the point where pressures to increase the release of Green Belt arise, the consequences for the countryside, much of which is of high intrinsic quality, will inevitably be negative. In addition, the existing social and physical infrastructure deficit will be compounded unless adequate resources are directed towards areas with significant growth potential (considered below).***

3.19 ***The Council wish to see the inclusion, in the supporting text to Policy T9, the benefits of the Airtrack Scheme noted as offering great potential to ease congestion in the area (details of which are available on www.airtrack.org).***

4. Legal Issues

4.1 The SEP will form part of the statutory Development Plan for Runnymede as prescribed in the Planning and Compulsory Purchase Act 2004.

5. Council Policy

5.1 The SEP provides the context for spatial planning in the Borough. It goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes that influence service provision within the Borough. The role of the SEP and the LDF will need to be emphasised more in many aspects of Council activity.

6. Sustainability Issues

6.1 The SEP is a fundamental part of the Government's Sustainable Communities Initiative. The Plan will be subject to a thorough Strategic Environmental Assessment and Sustainability Appraisal to ensure that social, economic and environmental issues are considered. The Council has established the Runnymede State Report that sets the context, inter alia, for monitoring the impact of development and this will form a key part of the appraisal process for the Development Plan.

Comment

6.2 ***Attention is directed to page 59 (item 8) of the EPM Sustainability Appraisal that highlights the need for providing community facilities for the existing and new developments be captured in policy guidance.***

7. Conclusions

7.1 The SEP will set the context for spatial development in the South East of England for the period to 2026. This timeframe requires the identification of sufficient 'development opportunities' to provide a 20 year period. This will have a significant impact on LDF's which hitherto (in the context of the Local Plan) have only realistically had to consider a 10 year time span. The implications for spatial planning at the Borough level are therefore considerable and the decisions made now will have significant implications for the next generation of those who live or work in the Borough.

7.2 The timescale for developing the SEP is much shorter than under the previous planning framework and this has given rise to some problems in that the LDF's have to be prepared at the same time as their strategic context (the SEP) is evolving. This has given rise to a number of logistical problems in attempting to develop LDF policy advice (e.g. on housing provision) in the absence of guidance on the scope of development (e.g. on housing numbers).

7.3 ***The 'in tandem' nature of the preparation of the SEP and LDF is giving rise to problems for those non-statutory stakeholders invited to comment on a whole range of policy issues at both the strategic and local level. It is proposed that the Districts assist with the consultation on the housing data during the period September – October 2005. This is the same period that Runnymede will be consulting on the LDF, with***

a focus on housing issues. The potential for consultation fatigue and confusion cannot be under-estimated.

OFFICERS' RECOMMENDATION that -

the comments set out in this report be forwarded to the South East England Regional Assembly as the Council's formal comments on the draft South East Plan.

(TO RESOLVE)

Background Papers

None

COMMENTS ON SOUTH EAST PLAN POLICIES

Policies - Assessment, Consistency and Monitoring

General Comment

The draft Plan is too long, insufficiently focused, and over-prescriptive in places. Some of the policies are little more than statements of objectives which repeat Government guidance. The Plan also acknowledges that some policies have been drafted before the completion of supporting technical studies. This makes it difficult to make meaningful comments and compromises the validity of consulting on them at this stage.

Cross Cutting Policies

Policy CC1: Active Management - While the importance of the need for active land and resource management is accepted, this is more the statement of an objective rather than a policy and does not add anything to Government guidance. It is debatable whether it could be effectively monitored.

Policy CC2: Climate Change - The need to mitigate and adapt to climate change is an important issue, but this is a statement of objectives for other Plan policies and does not add to Government guidance. It is not clear how it would directly translate into an LDF policy.

Policy CC4: Infrastructure and Implementation - The need for adequate and timely supporting infrastructure is supported, but the policy needs to be clarified to ensure that it encompasses infrastructure to support intensification in the urban areas so as to be consistent with the core strategy. Policy CC7 (Urban Focus), paragraph 1.4.5 and Policy H3 (The Location of Housing). In particular, the term 'land release' in the first sentence should be deleted.

The Implementation Plan is a long way from being fully developed and therefore difficult to comment on as to whether it will provide a suitable framework for local policies. However, it is crucial that it deals with delivery mechanisms to support cumulative small-scale development in urban areas, particularly a framework for local planning obligations policies.

Policy CC5: Use of Public Land - Some of this land is in the London Fringe and there is particular concern that this policy appears to treat the release of Government sites of regional significance as being 'outside' the overall spatial strategy. The release of this land needs to be managed and incorporated into the strategy/allocations at both regional and sub-regional level to ensure consistency.

Policy CC6: Inter-Regional Connectivity - It is recognised that the relationship with London is particularly significant, especially for much of Surrey, but as it stands this is more the statement of an objective. It should set out how inter-regional linkages will be addressed.

Policy CC7: Urban Focus - The focus for development on urban areas is supported, but the policy requires clarification. In particular, it should be redrafted so that it is clear that 60% of all new development on previously developed land is not seen as a target for individual Local Planning Authorities. Local Authorities should be seeking to maximise the use of previously developed land and buildings and minimising Greenfield land take.

The policy and supporting text also need to recognise that there should be delivery mechanisms to ensure that infrastructure investment in the urban areas keeps pace with development associated with urban infill/small-scale intensification to be consistent with the core strategy, paragraph 1.4.5 and Policy H3 (The Location of Housing).

There appears to be some inconsistency between the distribution options and this policy and Policy RT4 in relation to the role of transport hubs and interchanges.

Policy CC8: Spatial Emphasis - The identification of the London Fringe sub-region as an area of economic opportunity where planned provision needs to reflect economic potential and the development needs arising from economic expansion is inconsistent with Policy CC9 (Green Belt and Strategic Gaps) and Policy LF1 (Core Strategy) for the London Fringe sub-region. It fails to recognise that development pressures in the London Fringe need to be balanced against Green Belt policy and other important environmental constraints.

There should be a statement about the other parts of the region not identified as part of a sub-region as part of Policy CC8..

Policy CC9: Green Belts and Strategic Gaps - The commitment to retaining and supporting existing Green Belts and to improving their land-use management and access as part of urban/rural fringe improvement initiatives is supported. The draft policy is incomplete as regards strategic gaps and further information is required before comment can be made.

Economy and Tourism Policies

This chapter needs to recognise the relationship between employment and other policy areas and needs to link better with the rest of the Plan. The chapter is unbalanced given the number of tourism policies compared with the number of economic policies.

Policy RE1: Sustainable Economic Development - There is an overlap between this and Policy RE4: Policy RE1 could be incorporated within Policy RE4.

Policy RE4: Supply of Employment Land - The policy and supporting text appear inconsistent with the emphasis in Government advice on redeveloping surplus/unsuitably located employment land for housing. There are also references to allocating extra land which could be in conflict with Green Belt policy and sub-regional policies for the London Fringe.

Housing Policies

In view of the provisions of the recent Housing Act and the draft Circular on Planning for Gypsy and Traveller Sites, there should be references in the Housing chapter as to how the accommodation needs of gypsies and travellers will be assessed and provided for.

Policy H2: Delivering Adequate Levels of Housing - It is not possible to implement the policy as worded, since Local Authorities can rarely control the provision of all necessary supporting infrastructure.

Policy H3: The Location of Housing - The wording of the last paragraph of the policy is not entirely consistent with Policy BE5 (Village Management).

Policy H4: Affordable Housing - There is no reference to re-using surplus/unsuitably located employment land for housing (see above point).

The supporting text states that the cost of housing is a major barrier to continued economic growth and Policy CC8 designates the London Fringe as an area of economic opportunity. The draft Plan identifies Surrey Districts as having some of the largest 'affordability gaps' in the region. Government advice is that the South East Plan should provide the context for the regional housing strategy and that there should be integration between the two. However, the recently published Regional Housing Strategy does not identify Surrey as a priority for funding. There would appear to be significant inconsistencies here! It is critical that the Implementation Plan identifies sufficient funding sources to support the core strategy of the Plan. The Plan should give a definition of 'affordability hotspot' and clarify what is meant by 'a shift in land use from other uses to affordable housing' (para. 5.5). There is potential for the special 'policy initiatives' to conflict with other Plan policies.

Policy H5: Housing Density and Design - The policy should refer to the need for high quality design and for new homes to integrate into their surroundings.

Transport Policies

Policy T4: Regional Hubs - The supporting text refers to hubs as centres of economic activity and transport services that should aspire to become 'living centres' with the hub - usually the town centre - being the prime focus. There appears to be some inconsistency between the 'sharper focus' distribution option which is looking to promote hubs for housing growth that could require Greenfield releases and this Policy and Policy CC7.

The policy does not differentiate between hubs by size. The capability of individual hubs to develop their role needs to be considered at the local level.

Natural Resource Management Policies

Policy NRM1: Sustainable Water Resources and River Quality Management - In addition to 'major new development', clause (ii) should also refer to the need to plan for infrastructure investment (both for upgrading and new) to deal with the pressures arising from cumulative small scale developments in urban areas.

Policy NRM4: Conservation and Improvement of Biodiversity - There needs to be consistency between the policy and supporting text and Policy WCBV5 in relation to the Thames Basin Heath pSPAs.

Policy NRM7: Air Quality - Local Authorities have very little control over low level ozone, which is a region-wide issue. Therefore it is not clear how the policy can be effectively monitored.

Countryside and Landscape Management

Policy C2: Areas of Outstanding Natural Beauty - Legislation indicates that AONBs should be 'conserved and enhanced'. Policy C3: Landscape and Countryside Management refers to 'protect and enhance'. There should be consistency with both policies referring to enhancement.

Management of the Built and Historic Environment Policies

Policy BE3: Managing the Urban Rural Fringe - Clause (iii) could be in conflict with Policy CC9 in areas where the urban/rural fringe is designated Green Belt.

Town Centre Policies

Policy TC1: Development of Regional/Sub-Regional Town Centres - This policy and supporting section should be renamed 'Development of Town Centres' and there should be cross-references/linkage to Policy BE4: The Role of Small Rural Towns ('Market' Towns).

Policy TC2: Regional Network of Town Centres and Policy TC3: Sub-Regional Town Centres - These two policies overlap and should be merged. There is also a need to stress that the scale and nature of new development in a centre needs to be appropriate to its current/future role and function. Therefore, it is suggested that clause (ii) with retail added in and clauses (iii) and (iv) of Policy TC3 replace (or form the basis of revised wording) the paragraphs under the list of town centres in Policy TC2. The meaning of clause (i) of Policy TC3 is unclear and in any case more appropriate for the policy on retail. It could be replaced with wording that refers to the need for a balanced network (which is mentioned several times in the text but not reflected in any policy), but also to the need to ensure that the highest order centres are not undermined to the extent that their ability to perform their role/function is prejudiced. Such a revised clause should also be included in the merged policy.

Bluewater should be separated out from the list of town centres but identified as a regional shopping centre where future development should be consistent with Sub-Regional Policy KTG7 and its supporting text.

Policy TC4: Creating and Supporting Town Centres - In the first sentence, the words 'for town centre uses' should be inserted after 'appropriate sites' and the second sentence of the second paragraph should come at the start of the policy for clarification.

Social, Cultural and Health Policies

Policy S1: Reducing Disparities - This is a statement of intention rather than a policy and it is not clear how it would directly translate into an LDF policy.

Sub- Regional Policies

There is a need for a more consistent treatment of the sub-regions within the framework while the lack of consistency between the options for scales of growth being tested at the regional level and those being tested sub-regionally is not explained and is confusing.

London Fringe - As previously highlighted, there are inconsistencies between Policy LF1 and CC8 and CC9 and between LF7 and RE1 and RE4.

Spatial Options

The technical robustness of the 'sharper focus' distribution option needs to be questioned. It appears to have been derived on the basis of the number of regional hubs and urban areas in a sub-region and does not take full account of urban potential, key strategic environmental constraints such as pSPAs and concerns over delivery of infrastructure. There also appears to be some inconsistency between this distribution option which is looking to promote hubs for housing growth that could require Greenfield releases and Policy T4 and Policy CC7 in the regional policy framework.