Item 9

Consultation Draft South East Plan

18 March 2005

KEY ISSUE:

The South East England Regional Assembly has published an initial draft version of the South East Plan for public consultation. Comments have been invited by 15 April 2005.

The Committee are invited to provide comments on the policies and proposals. The views of the Committee will go to the Executive of the County Council when they consider its response to the South East Plan on 29 March 2005.

SUMMARY

The South East Plan (SEP) will comprise the Regional Spatial Strategy for the Region and eventually replace both current Regional Planning Guidance for the South East and the Surrey Structure Plan (and all other Structure Plans in the South East). The scope of the SEP will be much broader than that covered under the current arrangements. It seeks to provide a long-term strategy to 2026 for the Region that goes beyond traditional land-use and transportation boundaries, to cover greater integration with issues such as health, culture and education/skills.

It is the intention of both Government and the South East Regional Assembly (SEERA) that the SEP will play a key role in regional decision making, particularly on housing, transport and economic investment in the region, and will therefore have considerable influence on the Regional Housing, Economic and Transport Strategies and the deliberations of the Regional Boards being set up.

The policies and proposals in the SEP raise a number of key issues in terms of its spatial implications, the broad basis for the housing distribution, the provision of infrastructure and the role of the Regional Hubs.

RECOMMENDATION

That the Local Committee endorses the contents of this report to the Executive and makes such other comments on the SEP to be conveyed to the Executive as it considers appropriate.

INTRODUCTION AND BACKGROUND

1. The SEP will comprise, when approved by the Government, the statutory regional framework for development in the region to 2026, setting out scale, priorities and broad locations for change. It will replace current regional planning guidance and the Structure Plans in the region including the recently adopted Surrey Structure Plan. Together with the emerging Local Development Documents it will comprise the development plan for the area. It should be noted that whilst the SEP is being prepared by SEERA it will ultimately be approved by and comprise the Government's Plan.

2. Although the policies in the SEP cover the whole of the South East, it also proposes sub-regional strategies for a number of areas, three of which affect Surrey – the London Fringe, Western Corridor & Blackwater Valley and Gatwick sub-regions. Reigate & Banstead lies partly within the London Fringe and Gatwick areas. In particular the towns of Reigate and Redhill lie within the London Fringe sub-region.

3. SEERA are preparing the SEP in two stages. This draft (the consultation draft) comprises the first stage. It presents its main guiding principles for comment and seeks views on development options and other issues including housing, the economy, communications and transport, natural resources management, management of the built and historic environment, town centres, the implications (and opportunities) of climate change and social, cultural and health dimensions. The draft presents a range of housing options at the regional and sub-regional levels. It outlines options for how the Region should develop over the next 20 years or so and how each of the sub-regions identified can contribute to that. Regional Hubs (which include Reigate and Redhill) are seen as a focus for future development. It does not propose housing distributions at the District and Borough level. That will form part of a second stage process planned for the coming summer.

4. Both stages will be followed by the submission of the SEP to GOSE who intend to undertake a formal consultation of the whole SEP in spring 2006 with a subsequent public examination in summer 2006 and ultimately the approval of the SEP by ODPM.

KEY ISSUES

Spatial Options

5. The spatial options proposed by SEERA are based on two different patterns of development across the region. The first pattern is based on a continuation of existing policy which aims to reduce development pressure in the hotspots of the region, like Surrey, and boost economic activity and development in the growth and regeneration priority areas. The second pattern promotes a focus on both areas of economic opportunity (i.e. the hotspots) and regeneration. Alongside these two spatial patterns of development are three options for overall housing levels - 25,500, 28,000 and 32,000 dwellings per annum.

6. There is pressure from Government, housing providers and the economic sector for overall levels of new housing to be at the upper end of the range set out in the SEP. For example, the consultation draft Regional Housing Strategy, published the same day as the consultation draft, calls for a level of housing of at least 32,000 dwellings per annum. These pressures relate to the need to tackle the issue of affordable housing, but this cannot be tackled by numbers alone.

7. Both the London Fringe and Western Corridor areas, which cover most of Surrey, are considered to be areas of economic potential and by implication, economic growth. Policies in the consultation draft (CC8 and RE1) propose that planned provision in these areas must reflect potential for and the development needs arising from economic expansion. Under the second spatial option, called sharper focus, housing and other development requirements for Surrey are higher reflecting a greater emphasis on economic growth.

8. Whilst it may be accepted that economic growth is a key part of Surrey's success and ongoing high quality of life, the emphasis on areas of economic potential 'consuming their own smoke' is considered to be seriously flawed for the following reasons:

   - SEERA has defined the areas of economic potential on the basis of past-trend employment. Economic growth is not just about employment growth. In a Surrey context, it is about wealth creation through making the best use of what resources we already have (including land) and encouraging 'smart' growth with investment in value-added sectors of the economy. Furthermore, with the very clear government emphasis now on using employment land for housing, the employment growth forecast in Surrey could not be accommodated within the existing urban areas.

   - Surrey's geographical position – in between London and the other SE Counties – will always generate a considerable amount of commuting and the idealistic view that everyone will live and work in the county is totally unrealistic. Currently, 336,000 people either travel into or out of the County each day for work.

   - 'Sustainability' is not just about locating homes next to jobs. In Surrey and most of the South East, people make decisions about where they live on the basis of a large number of factors such as, access to roads and rail, cost of housing, quality of the environment and access to schools.

   - The environmental implications associated with growth are not adequately addressed in a strategy which is dominated by the outputs from demographic and economic forecasting.

9. Related to this is the issue of whether the London Fringe sub-region is appropriate in terms of its role and geographical definition. When the initial sub-regional study was undertaken by the County Council and reported to SEERA last summer, there was a very clear view that this area should generally cover the area within and adjoining the M25 and should have a policy of containment. As with the definition of Regional Hubs (see below) the sub-region eventually emerged from SEERA, without any justification, as a more extensive area with an emphasis on economic growth, not least because of the inclusion of the three regional hubs in Surrey within it.

10. It is vital therefore that SEERA are reminded of the original reason for the sub-region and emphasise that a) this area is all Green Belt outside the urban areas and b) the urban areas are already experiencing levels of intensification which are not being addressed adequately by infrastructure provision. SEERA must also be reminded about the continuing regional importance of the Green Belt and the need to maintain its integrity.

Housing Distribution

11. The overall housing options have been distributed to each of the sub-regions and the 'other areas' in the Region (i.e. those parts of the region that are not included in any sub-region). For Surrey, the best indication of what this means in terms of numbers is outlined in the following table:

SEERA Proposed Housing Provision Options - SEP Consultation Draft Jan 05

	Continuation of Existing Policy Spatial Option I			**Sharper Focus Spatial Option ii**		
	25,500 dwellings p.a.	**28,000 dwellings p.a.**	**32,000 dwellings p.a.**	**25,500 dwellings p.a**	**28,000 dwellings p.a.**	**32,000 dwellings p.a.**
London Fringe - Surrey	1,400	1,550	1,950	1,850	2,100	2,600
Western Corridor & Blackwater Valley- Surrey	200	250	300	250	300	350
Gatwick Area - Surrey	100	150	150	150	200	200
Rest of Surrey	200	200	300	200	200	200
Total Surrey Annual Housing Provision	**1,900**	**2,150**	**2,700**	**2,450**	**2,800**	**3,350**

12. At this stage in the SEP process the housing numbers have only been distributed as far as the sub-regions but an allocation for each District will be the subject of further consultation later in the year (the stage two process referred to above), following the submission of technical advice from the counties.

13. Before a judgement can be made about whether any of the above levels could be accommodated in a way that is not detrimental to the quality of life for Surrey residents, these need to be put in context. The consultation draft (Policies CC7 and CC9) makes it clear that the Green Belt must be retained and supported and emphasise that the prime focus for development should continue to be the existing urban areas. This means that most of the development in Surrey will be in the urban areas, which reflects current experience where over 90% of new housing is built in these areas. However, there are genuine concerns about the longer-term impact this will have on Surrey's towns if this strategy continues.

14. The independent panel for the Structure Plan EIP concluded…*"…there are well founded concerns about the continuing pressures for development in such a highly urbanised and economically buoyant county, not least because of the very high proportion of remaining land which is covered by Green Belt and/or other environmental restraints. Ultimately, there are limits to how far the pace of development in urban areas can continue without detrimental effects on infrastructure, services and the quality of life, especially in North Surrey."*

15. Each option will therefore have to be carefully tested in terms of environmental and infrastructure capacity.

16. There is some suggestion that the suburbs should contribute a significantly higher rate of development through the provision of higher density development. However, this issue was considered as part of the Structure Plan review and the conclusion was that, whilst some suburban areas could contribute more because of their accessibility to services and public transport, on the whole, most suburban areas have very poor accessibility to public transport. The impact therefore, of actively encouraging increased densities and consequently an increased number of residents in these areas, would increase the overall level of movement by car and would not be sustainable. However, the suburbs are clearly places that people want to live, therefore it is important that we continue to invest in them, but change and more development can only be accepted if it both protects those aspects of suburbia that are valued and brings benefits in terms of co-ordinated improvements to infrastructure and services, for example, if accompanied by a sea change in investment in bus services.

17. The issue of intensification in urban areas cannot be divorced from the 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.

Infrastructure

18. Allied to the issue of urban intensification is the need to support all new development with the infrastructure that communities need. The consultation draft (Policy CC4) recognises the need to support all new development and this was a key issue raised in all of the draft sub-regional strategies. It was also the main issue raised throughout the Structure Plan review process.

19. The scale of the problem 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.

20. 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.

21. 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. There may be some priority given to the Regional hubs, three of which are in Surrey but this may also mean that these areas will be expected to also be a focus for housing and economic growth (see later comments on the Hubs).

Regional Hubs

22. Regional hubs were identified in the Regional Transport Strategy which has been incorporated into the consultation draft. Surrey has three Regional Hubs – Reigate/Redhill, Guildford and Woking. All of these are contained within the London Fringe Sub-Region and are surrounded by Green Belt.

23. The hubs were originally identified as transport hubs based primarily on high public transport accessibility. They are now seen by SEERA more in terms of the relationship between transport accessibility and their function as centres for the promotion of economic growth and housing. For example, one of the key factors built into the housing distribution model used by SEERA was the number of hubs in each sub-region. It is implied that these areas will become a priority in future for transport investment to both address existing problems and improve their overall function as a transport hub.

24. Detailed proposals for each hub are to be prepared as part of the sub-regional strategy process but the consultation draft makes it clear that the expectation is that these areas now have a wider role to play in terms of future development within the region.

25. It is the contention of the County Council that there has been a misuse of the definition of 'Regional Hubs'. The County Council fully supported the promotion of the Hubs in the Regional Transport Strategy. This was subsequently reflected in the Surrey Structure Plan on the clear understanding that these were primarily about transport investment. There is neither an obvious audit trail to show how the definition has changed nor adequate justification of the new interpretation. Accordingly the role of hubs as considered in the consultation draft is STRONGLY OBJECTED TO. If there is to be pressure for these areas to accommodate a greater proportion of new development than others, this must only be promoted if significant improvements to the existing transport infrastructure are made and funding mechanisms are put in place to do this.

LEAD OFFICER: **Catriona Riddell**
TELEPHONE NUMBER: **020 8541 9455**

CONTACT OFFICER: **Les Andrews**
TELEPHONE NUMBER: **020 8541 9523**

BACKGROUND PAPERS: **South East Plan Core Document**
Implementation Plan
Monitoring Section
Initial Sustainability Assessment
