

Draft Regional Planning Guidance For The South East:

The Government's Proposed Changes

The SERPLAN Response

1. Introduction

- 1.1 At the end of March the Government published its proposed changes to the Draft Regional Planning Guidance produced by SERPLAN. The proposed Guidance covers the period up to 2016 and will supersede RPG9, published in 1994, which covered the period up to 2011. The Government invited SERPLAN, among other interested parties, to respond to its proposed changes by the end of the consultation period which it set at 19 June.
- 1.2 SERPLAN's response sets out the headline issues, arising from the proposed changes, to which SERPLAN is drawing particular attention. It also proposes in **Annex A** a number of detailed changes to policies and to the accompanying text which SERPLAN considers the minimum necessary to produce a comprehensive and effective spatial planning strategy for the region, along the lines set out in Draft PPG11.
- 1.3 SERPLAN's original draft, *A Sustainable Development Strategy for the South East SERP500*, contained essentially three categories of policy:
 - (i) those applying to local authorities in their land-use planning function;
 - (ii) those applying to local authorities in their wider capacity and to other organisations and interests with a regional role (including Government); and
 - (iii) a number of policies advocating changes to overall government policy which would have an effect on successful implementation of Regional Planning Guidance.
- 1.4 This response continues to press for wider policy changes to government policy which SERPLAN considers it necessary for Government to introduce in order to create the favourable context in which Regional Planning Guidance will be able to achieve its objectives. But these are not generally included in the detailed policy changes set out in Annex A, which are proposed for inclusion in final RPG. An exception is the Housing Chapter where the policy changes are crucial to achieving a higher level of housing provision within the urban areas.

2. Key Issues Arising

- 2.1 It is SERPLAN's view that while the Government has clearly adopted much of SERPLAN's general vision and approach, there are a number of serious omissions, the most important of which is the Government's discarding of the wider policy framework proposed by SERPLAN. The Government's new Draft Regional Planning Guidance

(the Proposed Changes) is focussed on providing guidance for the production of development plans and local transport plans, and contains only land-use policies. It is not therefore a broadly based, sustainable development strategy as put forward in SERP 500.

- 2.2 This goes back on the Government's own proposals for Regional Planning Guidance in the future as set out in *Draft PPG11 Regional Planning*, published last year. That proposed the 'adoption of a "spatial" strategy which extends beyond land use issues', and also indicated that 'in future RPG will also have a broader spatial role informing other strategies and programmes'. It is regrettable, therefore, that Government has not seized the opportunity presented by SERPLAN to achieve a horizontal, joined-up approach across government and other agencies.
- 2.3 This is the more surprising in that the new planning arrangements for London are predicated on a spatial planning rather than a purely land use basis. The fact that a similar approach has not been adopted for ROSE merely adds to the complexity of the relationships between London and the surrounding regions.
- 2.4 The Proposed Changes are also stronger in their presentation of good intentions than in setting out the means and policies whereby these are to be implemented. The Government has failed to give local authorities the tools to carry out the job it is asking of them, particularly in relation to housing type and tenure issues and the whole question of affordability. Similarly, in relation to wider housing issues, the Government has not acknowledged that existing mechanisms are inadequate to deliver the urban component of housing provision on the scale desired.
- 2.5 A key role of Regional Planning Guidance should be to set out a clear spatial framework for the longer term. The Proposed Changes lack both spatial content and clarity. There is confusion between the policy areas identified, particularly as regards the so called 'western arc', but also in relation to identification of the Priority Areas for Economic Regeneration (PAERs). This confusion of definition and failure to draw together the spatial content, when coupled with the shortcomings in economic policy, (see para. 2.6 below) results in a far from adequate context for spatial planning. SERPLAN put forward specific policies for each of the identified PAERs and the Areas of Economic Pressure. The Core Strategy was also expressed in spatial terms as it related to the countryside/rural areas/urban areas and the pattern of development generally. By contrast, the Government's proposed guidance is not South East specific.
- 2.6 The changes proposed by Government broadly endorse the spatial approach to economic rebalancing of the region proposed by SERPLAN, which is welcomed as far as it goes. What is of particular concern, however, is the watering-down of the policy thrust towards the Priority Areas for Economic Regeneration. SERP 500 promoted the PAERs as regional priorities for both public and private investment, but also as opportunities for inward investment. This lack of strategic support is compounded by the characterisation, in the Proposed Changes, of the PAERs as areas with economic difficulties rather than with economic potential.
- 2.7 The Government's proposals for housing provision as put forward in the Proposed Changes purport to be based on 'Plan, Monitor and Manage'. However, as set out in policies H1 and H2, local planning authorities are required to make provision for the period 1996-2016 at a predetermined, average annual rate of 43,000 dwellings per annum. This figure is to be reviewed after five years, but it is difficult to see how these arrangements differ from those previously in force, described as 'predict and provide'.
- 2.8 The annual rate put forward by Government, without technical justification, is higher than the level of provision proposed by SERPLAN and higher than the rate currently

being achieved of 39-40,000 dwellings per annum. The Government argues that the higher rate could be accommodated within the same 'footprint', or land-take, as that proposed by SERPLAN, but it has not responded positively to SERPLAN's request for the necessary mechanisms to be made available to achieve a higher urban component, even within the overall figures proposed by SERPLAN.

- 2.9 It is not possible to determine precisely at this stage what the full potential is to increase urban capacity within the region, although it is a key plank of SERPLAN's policy of urban renaissance to achieve an increase. Such an approach must, of necessity, be incremental and cannot be achieved overnight. To avoid further damaging and unsustainable greenfield encroachment in the South East requires a broad policy approach as advocated by SERPLAN, on a true P-M-M basis, and a recognition by Government of the role which it has to play in relation to mechanisms and resources to meet housing needs in the South East.
- 2.10 The Chapter on Transport is entitled a Regional Transport Strategy, but the Government acknowledges that it is an interim statement and will be subject to an early review. The Strategy as set out in the Proposed Changes, however, pays no attention to critical matters like congestion. Draft PPG11 sees the key to a successful Regional Transport Strategy as being the development of an overall demand management approach set within a spatial and sustainable strategy. The Strategy as presented takes no view of demand management, and the programme of transport projects does not support any spatial strategy, being in the main the current construction programme and commitments. The policies as set out in the Proposed Changes also downplay the role of transport providers in delivering the new facilities and services that the South East requires.
- 2.11 SERPLAN's consideration of the Proposed Changes has been handicapped by the absence of a Sustainability Appraisal. This document was promised at the launch of the consultation period, but had not appeared by the beginning of June. The lack of a published Appraisal has made the evaluation of the overall strategy and the individual policies and proposals put forward in the Proposed Changes more difficult and has made it necessary for SERPLAN, and other consultees, to draw their own conclusions as to the Government's appreciation of the sustainability implications and its justification of what is proposed. SERPLAN sees this as a particular issue in relation to newly proposed development such as that in the Potential Growth Areas. SERPLAN's own treatment of the question of new or expanded settlements makes it clear that such programme should be conceived firmly within the context of sustainable development and particularly only after full account has been taken of the capacity of urban areas (paras. 3.5.41 – 3.5.46 of SERP 500). A sustainability appraisal should have addressed the need for 'Potential Growth Areas' as well as the suitability of the particular locations identified before any such proposals were put forward. It should be made available to justify the choices made.
- 2.12 The following sections of this document set out SERPLAN's views on the key issues and provide the overall justification for SERPLAN's response. **Annex A**, as already referred to in paragraph 1.2, sets out SERPLAN's detailed criticisms of the Government's proposed changes and puts forward specific amendments primarily to policies, but also to the supporting text. **Annex B** reproduces, with amendments, Table 2.1 from SERP500 which sets out the additional measures which SERPLAN considers should be introduced to implement successfully the policies for housing provision and urban concentration and renaissance. **Annex C** contains the format for a table which should be introduced to Chapter 13, setting out, for each RPG policy, the complementary, non-land use measures that are available now and by whom they should be implemented.

Finally, **Annex D** sets out the format for a monitoring framework, which should replace the table in Policy MON1.

3. Scope: Land-Use RPG or Sustainable Development Strategy

- 3.1 Sustainable development cannot be achieved by the land use planning system acting alone. It is critically important that all decision makers contribute to the process. The statutory planning system is but one of the delivery mechanisms required in a co-ordinated approach to spatial planning in the region. Urban renaissance, for example, requires a co-ordinated approach by all relevant agencies - a fact highlighted by the Urban Task Force. Public transport is only going to become a realistic alternative through large scale private investment. The roles of individuals and organisations therefore need to be clear, as does the relationship between the different strategies and delivery mechanisms operating within the region.
- 3.2 SERP 500 set out in some detail the expected contributions of these other bodies and mechanisms, including central government, and called for new mechanisms where these were needed. This was done both in individual policies and a table in the chapter on Implementation. Many regional partners indicated that they found this helpful. This approach is consistent with the concept of spatial strategies developing throughout Europe and is reflected in guidance given by the Government in draft PPG11, which says 'in future RPG will have a broader spatial role informing other strategies and programmes'.
- 3.3 The Proposed Changes adopt a restricted 'land-use' role. The detailed policies are directed solely to development planning and transport planning – the other categories of policy included in SERP 500 are omitted. The Proposed Changes do not properly address the relationship between the RPG and the RDA Regional Economic Strategies (although para 1.3 of the Proposed Changes states that the RPG provides the spatial framework for other strategies and programmes including the RES, the document fails to reflect this). The Proposed Changes fail to draw connections or even cross refer in the policies to the activity of other partners.
- 3.4 The Government may argue that, since the Sustainable Development Frameworks (being prepared by the Regional Assemblies) will provide the overall context within which all the regional strategies and programmes will nest, the RPG can be restricted to land use matters. The SDFs, however, will simply be frameworks and will not have effect on any statutory mechanisms of implementation as does RPG. Besides, providing context is very different from detailing how strategies and mechanisms are to mesh to greatest effect. The Government's approach will, therefore, lose much of the opportunity which the planning system provides to guide and influence others in the achievement of the objectives which Government has set out for the region. RPG should place greater emphasis on the need for the co-ordinated delivery of a range of services, as well as land use planning, to achieve its objectives. It should clearly state which these are, and where they are significant. A joined up policy approach is especially vital to the achievement of an urban renaissance on which so much of the Government's housing policies depend.

Summary:

SERPLAN is pressing for:

- (i) The re-introduction of the key linkages that need to be made with the actions of regional partners.**
- (ii) The re-introduction of the wider-ranging, non land-use policies contained in SERP 500 to establish RPG as the spatial strategy for the region.**

4. Implementation and Mechanisms

- 4.1 The Proposed Changes are, regrettably, stronger in their presentation of good intentions than in setting out the means whereby these are to be implemented. The passage headed "Implementation" in Chapter 13 amounts to three short paragraphs. Aside from the question of partnership action, addressed above, significant improvements to the treatment of this issue are required in a number of areas.
- 4.2 First, RPG should identify the mechanisms, which are to be used to achieve its objectives. SERPLAN has argued that existing mechanisms are inadequate in important areas, but no acknowledgement of this is made in the Proposed Changes. The Government has not responded positively to SERPLAN's request that it should consider:
- (i) strengthening the powers of local authorities to specify the range, type and tenure of all dwellings, in particular those provided to meet local needs;
 - (ii) measures to make the best and most efficient use of the existing housing stock;
 - (iii) equalisation of VAT to put refurbishment and conversion of existing buildings on a par with new buildings;
 - (iv) enhanced compulsory purchase powers for local authorities; and
 - (v) comprehensive measures to discourage greenfield development and to encourage the re-use of brownfield sites.
- 4.3 SERPLAN should continue to press for these and the other mechanisms it has identified as being needed.
- 4.4 Second, there is no indication that the resources necessary to achieve the objectives of the RPG will be forthcoming or, more realistically, what priorities should be set given the inevitable shortfall of resources. Where priorities are set, as for investment in regional transport, the linkages with the locational strategy for development appear tenuous. In other areas, for instance in achieving improvements in urban quality, there is no real indication of what is practically possible or where efforts should be concentrated. RPG should provide greater clarity on the availability of resources and the consequences thereof.
- 4.5 Third, the role of targets is badly underplayed in the Proposed Changes. The policy on monitoring sets out a range of "potential targets and aspects for which regional targets should be defined". Many of these targets and indicators are generic rather than closely defined and, as acknowledged, require further work. It is regrettable that the targets (with a very few exceptions) do not appear in policies or the supporting text, where they would provide a focus for action. They lose much of their impact in being confined to a table at the back of the

document. The importance of targets as "headlines" has been ignored (c.f. SERP 500 and the national sustainable development strategy).

- 4.6 Finally, arrangements for monitoring the successful implementation of RPG need to be sharpened considerably. SERP 500 included a clear monitoring framework listing indicators and targets explicitly linked to the sustainability objectives, to relevant policies and to data sources. This has been set aside for a table setting out thirty-five "potential indicators and types of indicator" as "the basis for a future monitoring system". SERPLAN and its successors are required to agree with the relevant Government Offices the design and organisation of the monitoring system and pattern of reporting. No deadline for this agreement is set. This approach does not appear consistent with the statement in draft PPG11 that "Before issuing RPG the Secretary of State will expect to see details of the proposed monitoring arrangements".

Summary:

SERPLAN is pressing for:

- (i) Clearer statements on the mechanisms and resources necessary, and likely to be available, to implement RPG.**
- (ii) The incorporation of targets in policy and supporting text.**
- (iii) The incorporation of a clear monitoring framework in RPG.**

5. Clarity of Spatial Framework

- 5.1 The key role of Regional Planning Guidance is to set out a clear spatial framework for the region for the long term (15-20 years). The Panel Report into the Public Examination highlighted the view of business, development interests, investors and transport operators of the importance of clarity (para 13.10, p 110).
- 5.2 The Proposed Changes lack both spatial content and clarity.
- 5.3 There is potential for much confusion in the "policy" areas identified.
- (i) The core strategy map indicates a Western Arc, the Thames Gateway and Priority Areas for Economic Regeneration (some not adequately reflecting the descriptions in the text). The map also shows three sub regions which are described under the Western Arc heading in chapter 12 (Western Wedge, The Blackwater Valley and the Crawley/Gatwick/M23 area). Despite being under the Western Arc heading they extend well beyond its (notional) boundaries. In addition there are references to "hotspots" both within and outside the Western Arc (although the relevant policy is confined to the Western Arc).
 - (ii) Green Belt. The policy states that there is no regional case for reviewing the Green Belt boundaries (E2), but in a number of the sub regions the possible need for revision is identified.
 - (iii) Thames Gateway. Despite the Secretary of State being minded to adopt the boundary extension which SERPLAN proposed, it is suggested that there should be no update or review of RPG9A the Thames Gateway Planning Framework.

- (iv) Potential Growth Areas. The nature, scale and potential of each of these areas is very different. Rightly the study proposals vary, but, given their differences, unnecessary confusion may be caused by classifying all of them under the same heading.

None of the sub regions identified have policies relating to them. Even the broad policy areas (the Western Arc, the Thames Gateway and the PAERs) only have economic policies (RE8, RE6 and RE7 respectively), and are not directly reflected in any of the remaining policy areas (housing, transport, etc.). Policies and text regarding other spatial areas (rural areas, urban areas, London and Rural Development Areas) occur in a number of places in the document, but are not drawn together.

- 5.4 This confusion of definition and failure to draw together the spatial content, when coupled with the shortcomings in economic policy, in relation to the PAERs in particular (see section 6 below), results in a far from adequate spatial context for planning. The bulk of the proposed guidance is not South East specific.

Summary:

In response to the lack of a clear spatial framework in the Government's draft, SERPLAN proposes:

- i) Changes to the areas identified in order to increase clarity. For instance the extension of the Western Arc to include the Western Wedge and Crawley/Gatwick/M23.**
- ii) A review of the Thames Gateway Framework (RPG9A).**
- iii) An expansion of the sub-regional areas chapter to highlight potential opportunities in the PAERs and to indicate specific policy intentions in the sub-regions.**

6 Maximising the Region's Economic Potential

- 6.1 The Government's Proposed Changes can be regarded as broadly endorsing the spatial economic strategy embodied in SERP 500 – a selective approach to economic development in the area to the west and south of London (renamed the Western Arc) and the identification of the Priority Areas for Economic Regeneration – and are to be welcomed in this respect. The 'Proposed Changes' approach to the 'Western Arc' in the form of Policy RE8 requires some modification, particularly to reinstate strategic support for what has been recast as essentially the domain of local policy-making, and amendments are set out in Annex A. Of more fundamental concern is the treatment in the Proposed Changes of the PAERs.
- 6.2 SERP 500 provided comprehensive coverage of the PAERs. It set out clearly the rationale for their designation and provided the appropriate economic strategy (Policies RR5 and ES3). Together these policies promoted the PAERs as regional priorities for
- (i) the receipt of funds for infrastructure, development and environmental improvement;
 - (ii) for transport investment that will improve local accessibility; and
 - (iii) as opportunities for inward investment.
- 6.3 This regional emphasis was given further weight by the SERP 500 policies on transport investment which gave priority in public funding to developments within the PAERs (Policy ST6). The Spatial Implications Chapter of SERP 500 set out the key features of each of the PAERs, taking pains to draw out in a positive way the economic opportunities that they offer,

and identified the particular policy approaches that are most likely to release the economic potential of each of the areas for their own benefit and to raise the overall capacity of the region to absorb economic growth.

- 6.4 The treatment of the PAERs in the Proposed Changes is significantly different. Thames Gateway has a special policy of its own and is therefore treated separately from the other identified PAERs - Policy RE6. (The approach to the development of Thames Gateway is dealt with in Section 5 of this report.) The development of the remaining PAERs (with the inclusion of Harlow and reduced coverage of the South Coast) is primarily addressed in Policy RE7 of the Proposed Changes. In that the policy points relate only to development plan activity, the PAER policy is essentially local rather than strategic. It thus offers none of the regional support provided by SERP 500. Even the lower case text which refers to the activities of the RDAs and the Learning and Skills Councils is devoid of any flavour of prioritisation. Similarly, while the proposed changes refer to priorities for investment in transport infrastructure including links between the PAERs and other parts of the region, it fails to provide prioritisation for investment *within* the PAERs (para. 9.41). Moreover, it includes a counterbalancing priority for proposals which facilitate access to the 'areas of
- 6.5 The general lack of regional strategic support for the PAERs is compounded by the descriptions in Chapter 12. The portraits of the individual PAERs appear to serve no purpose other than unjustifiably to characterise them as areas in economic difficulties and hence lacking in economic potential. In summary, the approach to the PAERs in the Proposed Changes falls far short of the clear prioritisation afforded by SERP 500. It is only with clear messages about regional priorities, to the development industry and to the economic implementation agencies such as the RDAs and the Learning and Skills Councils, that the undoubted potential of the PAERs will be released. SERPLAN regards the amendments that it is proposing to policies RE6 and RE7, and to the treatment of the PAERs in Chapter 12, as the minimum necessary to reflect the role of development in the PAERs in expanding and enhancing the region's economic capacity.

Summary:

In response to the lack of regional priority afforded to the PAERs, SERPLAN is proposing:

- i) A re-drafted Chapter 12 with the aim of promoting the potential of the PAERs.**
- ii) Changes to make good the inadequacies of the policies described, particularly as these apply to the prioritisation of the PAERs.**

7. Provision of Housing including Affordable Housing

[To be completed based on Conference's decisions relating to MPG advice on the overall level of housing provision (as set out in SERP565)]

8. Transport Deliverability and Demand Management

- 8.1 The Chapter in the Proposed Changes is entitled a Regional Transport Strategy. The Government, however, acknowledges that this is an interim position and should be subject to an early review.
- 8.2 Nonetheless, the Strategy set out at this stage could be more wide ranging in its policies. A Regional Transport Strategy according to draft PPG11 should be an action plan and provide a strategic steer on the role and future development of transport within the region, including immediate priorities. The Strategy does not do this: it pays little or no attention to critical matters like congestion, pollution, road safety and maintenance of the existing transport fabric, despite their prominence in the Transport White Paper. Yet it is by tackling those matters that improved accessibility for all can be secured, with consequent benefits to the economy and to the environment.
- 8.3 Of critical importance to improved transport is the role of the transport industry itself. Here the policies seem to downplay their role in delivering many of the new facilities and services that the South East requires. Many transport organisations e.g. Railtrack, the Shadow Strategic Rail Authority are preparing plans of their own. As noted in Section 3 above, such organisations should be seen as partners in furthering the needs of the South East and be clearly associated with the development of transport policies and priorities through Regional Planning Guidance.
- 8.4 Draft PPG11 sees the key to a successful Regional Transport Strategy as being the development of an overall demand management approach set within a spatial and sustainable strategy. Instead the Strategy as presented takes a narrow view of demand management, concentrating almost exclusively on travel plans and maximum parking standards. There is no reference in policy to transport assessments, a central feature of draft PPG13, for all new developments; nor are there any policy references to the obligations placed upon Local Authorities to produce traffic reduction targets. The deletion of Policy ST8 without any commensurate replacement sends the wrong signal about the role of demand management for future travel.
- 8.5 The programme of transport projects does not support any spatial strategy, being in the main the current construction programme or commitments to studies. Regional priorities for investment are very generalised. There is little attempt to link or guide investment priorities, either locationally or in timing, with the distribution of development. Areas like Thames Gateway and the Priority Areas for Economic Regeneration (PAERs) are given no real priority and schemes like Cross-Rail are not mentioned at all.

Summary:

SERPLAN proposes that Transport policies should be expanded to reflect:

- i) The important role outside transport organisations have in delivering transport improvements.**
- ii) The wider role of demand management in tackling issues like congestion, pollution and safety.**
- iii) The need to link transport improvements more clearly with the spatial strategy.**

