

Public Consultation on the Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy (RSS) for the East of England

To: **Cambridgeshire Horizons Board**

Date: **2 March 2007**

From: **Director for Development**

Purpose: **To consider the consultation from Government on the Proposed Changes to the Draft Regional Spatial Strategy for the East of England**

Recommendation: **The Board is asked to:**

- i) Note the key points of the Proposed Changes to the RSS.**
- ii) Approve a proposed consultation response to Government relating to the Proposed Changes as set out in this report. (Draft response to be tabled)**

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1 INTRODUCTION

- 1.1 The Regional Spatial Strategy (RSS) for the East of England will set out the formal statutory guide for development in the region until 2021. It relates to housing, economic development, the environment, transport, sport and recreation and waste.
- 1.2 The Secretary of State is carrying out a public consultation on the Government's Proposed Changes to the draft RSS for the East of England. Comments must be submitted by 9th March 2007. The East of England Regional Assembly is considering the Government's Proposed Changes and has already raised strong objections. The Assembly is due to meet on 8th March to consider these matters further.
- 1.3 The local authorities in the Cambridge Sub Region are responding separately to the consultation. However, it is anticipated that a combined response setting out the key issues will also be sent.
- 1.4 The Secretary of State is expected to publish the final RSS in mid 2007. Once approved, the RSS will provide a regional planning framework for districts to produce their Local Development Documents, which must be in general conformity with the RSS. Previous regional planning guidance and the Structure Plan will be superseded by the finalised RSS.

2 BACKGROUND

- 2.1 The East of England Regional Assembly (EERA) is the Regional Planning Body (RPB) for the East of England. EERA published the draft RSS for public consultation in December 2004. A copy of the document can be viewed at:
<http://www.eera.gov.uk/category.asp?cat=452>
- 2.2 Following this consultation, an Examination In Public (EiP) was held from November 2005 to March 2006 to test the soundness of the Draft RSS. The Report of the Independent Panel was published in June 2006. This report made recommendations as to how the Draft RSS might be improved. This document can be viewed at:
http://www.eera.gov.uk/Documents/About%20EERA/Policy/Planning%20and%20Transport/EiP%20Report/East_of_England_Plan_Examin1.pdf
- 2.3 After the EiP the Government is required to publish and consult on any "Proposed Changes" to the draft RSS and provide the reasons for these changes. The Government published the "Proposed Changes" document for a 12-week period of public consultation, which started from 19th December 2006. This document can be viewed at:
http://www.go-east.gov.uk/goeast/planning/regional_planning/?a=42496

- 2.4 EERA will be consulting in the next few months on both an Implementation Framework and Monitoring Framework, which will support the delivery of the RSS. The final versions of these documents will be published with the final version of the RSS.
- 2.5 Once approved, the finalised RSS will replace existing Regional Planning Guidance for East Anglia to 2016 (RPG6) and the Cambridgeshire & Peterborough Structure Plan 2003. However, some policies of the current Structure Plan will be saved as part of the finalised RSS process. The precise policies will need to be determined by the Structure Plan Authorities and EERA. Ultimately, these policies will also be superseded by the Cambridgeshire Core Strategies Development Plan Documents that are adopted by Local Planning Authorities (LPAs).

3 Government's Proposed Changes to the Draft RSS

- 3.1 A summary of the main changes as they relate to Cambridgeshire is shown in **Appendix A**. The respective housing provision and job growth targets set out in the Structure Plan, Draft RSS and Government's Proposed Changes to RSS are summarised in a table in **Appendix B**.
- 3.2 For the most part the Government has agreed to the Plan as it affects Cambridgeshire. The significant issues relating to Cambridgeshire Horizons are discussed below.
- 3.3 Definition of Sub Region
 - 3.3.1 The proposed changes reinstate the Structure Plan definition of the Cambridge Sub Region to include the four market towns outside of Cambridgeshire of Newmarket, Haverhill, Saffron Walden and Royston. Although this approach clearly makes sense in terms of economic activity and travel to work areas, it remains unclear how sub-regional planning policies covering this wider area involving two four county councils and nine district councils will be developed and delivered.
- 3.4 Housing Targets
 - 3.4.1 The allocation of new dwellings to Cambridgeshire has been increased by 5,200 dwellings, of which 4,300 are allocated to Cambridge and a further 900 to Fenland. A further change is that Local Planning Authorities (LPAs) will be expected to plan to exceed RSS housing levels to 2021, as targets are to be treated as a "minimum" figure with no upper limit and no allowance permitted for windfall housing sites. Government also asserts that LPAs should plan to apply the same high growth rates up to 2031, although growth levels for that period have not been determined or tested.
- 3.5 There is concern that the extra 4,300 dwellings [29% above the draft RSS target for Cambridge City) can be delivered in the plan period. It could be seen to be unrealistic to apply such untested levels of growth for the period beyond 2021 without first considering whether such levels of growth can be accommodated. While no review of the Green Belt is advocated at this stage,

the Government is suggesting that a further review of the Cambridge Green Belt may be necessary as part of the forthcoming RSS review due to start later this year. References to Cambridge as a “compact City” have been deleted.

3.6 These changes will have major implications for infrastructure provision. It is therefore important to plan for long term growth (i.e. through the Long Term Delivery Plan currently being prepared), but also to consider very carefully the deliverability of infrastructure for higher growth levels.

3.7 Affordable housing

3.7.1 The Proposed Changes remove the requirement for 40% affordable housing for developments in the Cambridge Sub Region. Instead a figure of 35% is proposed as a target for the region, with no provision for minima proportion or sub regional variation. The RSS review will need to be informed by the Sub Regional Housing Market Assessment currently being undertaken.

3.8 Transport and Other Infrastructure

3.8.1 The RSS identifies the Cambridge area as one of the areas which will come under increasing transport pressure as a result of the strategy. The Proposed Changes state that such areas should be subject to further studies, although no assurances are given over future infrastructure funding or provision. Clearly, the future development of the Transport Innovation Fund (TIF), applied to Cambridgeshire, will have a major impact on addressing concerns relating to transport in the Cambridge area.

3.8.2 It should also be recognised that there are other areas of infrastructure that are subject to similar challenges, in particular the provision of health and social care services. High levels of growth and demographic changes will place increased burdens on local authorities and agencies.

3.9 Implementation

3.9.1 Proposals for high level regional coordinating arrangements for implementation have been endorsed. A new policy IMP1, identifies the importance of coordination across private, public and voluntary sectors through regional arrangements, local authority’s early preparation of LDDs and the work of Local Delivery Vehicles. The recognition of the role of LDVs is to be welcomes.

4. **CONCLUSION**

4.1 The Proposed Changes set out further challenges to the Sub Region, which added to the delivery challenges already faced, are causing considerable concern amongst the relevant local authorities. The Horizons Board is asked to consider the issues raised with regard to implementation and to advise on a response to the consultation along the lines set out in this report.