

Summary

The plans. The South East Plan was approved in 2009 after six years of development and a public inquiry over five months. The South East Regional Economic Strategy was written by the former South East Economic Development Agency. They together form the South East Regional Strategy, which will be revoked, subject to the results of the strategic environmental assessment (SEA).

The SEA. The Coalition Agreement included an intention to “rapidly abolish regional spatial strategies.” It was not to be. The first attempt at abolition in 2010 was scuppered by Cala Homes, which wanted to build on Barton Farm outside Winchester. Although the government won the case at appeal, it had by then agreed to a ‘voluntary’ strategic environmental assessment. That assessment, published in October 2011, was universally judged to be inadequate. An unrelated ruling in the European Court of Justice in March 2012 made it clear, if there was any remaining doubt, that a full scale environmental assessment is required. Simply put, if an strategic environmental assessment is needed to get a plan in place, it is also needed to revoke it.

Revocation. The communities department published the assessment for the revocation of the East of England Plan in July, followed in September by the SEA for the York and Humberside Plan. The SEA for the South East Plan was issued on 10 October (consultation closes on 6 December 2012) [1]. The communities department has confirmed that it does not yet have a date in mind for the actual abolition of the SEP.

The conclusion. The SEA says that revocation will not make a great deal of difference to the population, health and the environment of the South East. There are some negative effects. Lower levels of affordable housing and less brownfield development are among them. But the effect of abolishing the SEP is drowned out by the broader changes in planning policy and government housing strategies, and by the continuing recession.

Policies

Green belt reviews. One of the most controversial SEP policies promoted reviews of the green belts around Oxford and Guildford. This policy was subject to a number of legal actions, including a successful challenge by CPRE Oxfordshire [2]. A consent order was issued deleting sections relating to the green belt south of Oxford, but the SEP text was not changed due to the change of government. Mike Tyce of CPRE Oxon says: “Although this has meant that the text of the SEP has been left unaltered, Inspectors into both the City and South Oxfordshire Core Strategies have accepted my description [of the policy relating to] Grenoble Road as a dead parrot.” The SEA notes that the Oxford City and South Oxfordshire core strategies do not mention a green belt review and concludes: “revocation of the South East Plan is likely to lead to a lessening of the pressure on the Oxford Green Belt to the south of the city compared to retention” [p186]. The SEA concludes: “Pressure for review of [green belt] boundaries will be reduced following revocation” [p86].

Brownfield. “The removal of the specific target [for brownfield development] could reduce the amount of brownfield land reused for development and lead to an increase in development on greenfield sites” [p86]. There is uncertainty whether suburban renewal and intensification will proceed at the same pace as under the SEP, potentially leading to greenfield loss [D237].



Did the South East Plan Matter?

Hundreds of people from CPRE, the environmental and planning communities were sucked in to the six year development of the South East Plan. Now it is set to be revoked. Will its abolition matter?

Not much it seems. If the plan is kept in place there will be positive and negative effects for population, health and the environment. If the plan is abolished, those positive and negative effects are largely the same.

In 1,374 pages of tortuous text worthy of Sir Humphrey, the strategic environmental assessment assures us that the revocation will have almost no impact. So why did we go through that long, convoluting and conflict-ridden process? There is nothing much in the South East Plan that could not have been achieved by councils in isolation, in cooperation or under national policy statements. Did we really need six years and that interminable inquiry in Reading to tell councils that they need to plan to build?

The South East Plan came at a huge cost. Planners were diverted from getting local plans into place. They had to struggle to make those plans fit the South East Plan – often against councillors’ and residents’ wishes. The planning system inevitably became bogged down. The strategic environmental assessment suggests that 47 of 68 local authorities in the South East now have plans that are out of date. That total would be a lot less if vast resources had not been dragged into regional planning. Officials and councillors were forced to look away from their local communities toward Guildford. One Oxford planner told me a few years ago that: “we [Oxfordshire] are just a cog in the wheel of the bigger south east planning system.” Maybe, but it was a wheel that turned excruciatingly slowly.

The opportunity cost of the South East Plan is now clear. Too many local plans are not up-to-date. Too many councils have been left vulnerable to the presumption in favour of sustainable development. Come April Fool’s day next year, when the NPPF comes into full force, the penalties of concentrating on regional strategies at the expense of local plans will become all too apparent.

Andy Boddington

My thanks to Mike Tyce for his briefing on the Oxford green belt and giving me the opportunity to mention a dead parrot in an eBulletin for the first time. Numbers written [p##] are page numbers in the main report [3]. Numbers prefixed by D, refer to Appendix D.

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Housing. In the short to medium term, abolition is expected to lead to fewer houses and fewer affordable homes being completed in the 47 local authorities that adopted a local plan prior to the SEP coming into force. Somewhat inconsistently, the SEA also says: “The application of the NPPF’s presumption in favour of sustainable development and its policies to boost the supply of housing will help where local plans or policies are absent, silent or out of date” [p178]. In plainer English, a free-for-all could follow the abolition of SEP in 47 council areas that lack an up-to-date local plan and that development might lead to damage to the environment.

Development. The assumption throughout the SEA is that a similar level of development in the South East will proceed with or without the plan. The SEP would have led to “significant negative effects in relation to water resources, material assets, climate change and air quality arising from development associated with housing, employment provision and airport development.” After abolition: “a locally-led approach could ensure that the adverse effects are more effectively mitigated” [pxiii]. The SEA is uncertain what impact revocation will have on town centres due to uncertainty over where development and urban intensification will be located [p99].

Environment and heritage. Abolition will have no overall effect as the NPPF and the Natural Environment White Paper will protect the environment. Revocation will be “significantly positive” for cultural heritage, as the NPPF and national policies are stronger than those in the SEP.

Areas of Outstanding Natural Beauty. The SEA notes that that coastal AONBs are nationally protected only to the high water mark. The SEP had “encouraged planning authorities to work to protect nationally designated landscapes to the low water mark. . . Following revocation it is uncertain whether this objective would be given priority by planning authorities” [p255].

Thames. Coordination of policies in the River Thames Corridor is threatened in the short term under the NPPF, which treats all the policies separately. “There may be a short delay in achieving the co-ordinated improvements in landscape, cultural heritage, material assets and soil” [D233]. Abolition is unlikely to have any effect on the Thames Basin Heaths Special Protection Area [D127].

Water. Water scarcity features prominently. “As the South East is one of the driest and most densely populated region in the UK, new development could create significant shortfall in terms of water supply and demand, and population increases coupled with climate change may place further pressure on water resources. . . Areas likely to be significantly affected include South Hampshire, London Fringe, Western Corridor and Blackwater Valley, and Milton Keynes and Aylesbury Vale. However the effects are likely to be minimised as far as possible through the operation of the region’s water companies and [the] NPPF” [p178].

Renewable energy. Revocation will mean that air quality may not be improved, climate change emissions may not be reduced and climate change targets may not be met. However, “potential adverse landscape effects” from larger wind farms and “minor negative effects on a small proportion of the population from noise and shadow” are not now expected to occur [D142]. “Some 26 local plans adopted before the SEP was adopted do not contain policies on renewable energy and for these authorities there is a clear policy gap” [D149].

Transport. The SEA recognises that the SEP was destined to have negative impact on air and noise pollution. Abolishing the SEP will not make any difference [p93].

Waste and minerals. Following revocation, the South East may not be self-sufficient in waste management, local authorities may decline to process their apportionment of London’s waste, and regionally significant waste facilities may not be built [p97]. The mineral policies of the NPPF are more sustainable than those of the SEP, so abolition will be positive [p97].

Sub-regions

Sub-regions were areas targeted for development in the SEP. The SEA says that revocation will not remove the need for growth or for new homes in the sub-regions. It puts a strong emphasis on local enterprise partnerships delivering development, especially across local authority boundaries. All sub-regions will experience short to medium term uncertainty while local plans are completed.

South Hampshire. Local enterprise partnerships, PUSH and the duty to cooperate will ensure development is delivered. Abolition will however lead to “more greenfield development. The extent to which this would affect biodiversity, landscape and soil will depend on [its] eventual location, scale and nature” [p151].

East Kent and Ashford. Revocation will make little difference but “there are . . . likely to be minor negative, neutral and uncertain effects. . . given the impacts of new development some of which will be located in large urban extensions on greenfield land” [p103].

Kent Thames Gateway. Without SEP, “there remains uncertainty regarding the extent to which individual authorities would seek to set levels of development which comply with the SEP [and] there may be uncertainty in the short term. . . The effect of this would be to delay the significant positive benefits to the population and any adverse impacts associated with development” [p104].

Western Corridor and Blackwater Valley. “Ultimately, the environmental effects will depend on the quantum of housing delivered. . . the location and other factors such as their design. Much of the NPPF seeks to mitigate as far as possible adverse effects on the environment” [p105].

Central Oxfordshire. “Revocation of the SEP is likely to lead to a lessening of the pressure on the Oxford Green Belt to the south of the city compared to retention.” The saved Structure Plan policy regarding the development of land at RAF Upper Heyford will be retained to safeguard the site and its heritage value until the Proposed Submission draft Cherwell Local Plan . . . is adopted” [p106].

Milton Keynes and Aylesbury Vale. “In the short to medium term following revocation, there is likelihood that the dwellings delivered will not meet the South East Plan’s housing figures” [p106].

Gatwick. The SEP anticipates that to “deliver the level of growth there would need to be sustainable urban extensions for Crawley, Horsham, East Grinstead and Burgess Hill. It is now less certain, given the varying status of the relevant local authority plans whether development will be located in this way” [107].

Sussex Coast, London Fringe, Isle of Wight and ‘areas outside the sub regions’. “The effects of revocation are largely the same as retention.”