

**HERTFORDSHIRE COUNTY COUNCIL**

**CABINET**

**MONDAY 16 DECEMBER 2002 AT 2.00 P.M.**

**COUNTY COUNCIL (EXTRAORDINARY MEETING)**

**TUESDAY 17 DECEMBER 2002 AT 10.30 A.M.**

**REGIONAL PLANNING GUIDANCE NOTE 14 – OPTIONS  
CONSULTATION DOCUMENT**

Report of the Director of Environment

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<u>Agenda Item No.</u>
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**1. Purpose of report**

- 1.1 To consider the document entitled “East of England – your region ,your choice, your future”, which has been prepared by the East of England Local Government Conference, and to set out a proposed response to this document on behalf of the County Council for Cabinet to agree and County Council to endorse.

**2. Summary**

- 2.1 The East of England Local Government Conference (EELGC) launched its consultation document setting out options for Regional Planning Guidance (RPG14) for the East of England on 20 September. This will be the first RPG prepared for the new East of England Region and will cover the period up to 2021. The period of public consultation ends on Monday 16 December.
- 2.2 The consultation document asks for views on 60 questions relating to the content and proposals in the document. In general terms the questions would appear to provide a satisfactory framework to put forward many of the County Council’s concerns and recommendations. However, given the interdependence of many of the issues and options being considered, it is also proposed that the County Council submits an introductory statement which highlights some overarching issues of concern. It is proposed that this statement be based on the content of Section 4 of this report. Appendix 1, proposed responses to all of the 60 questions
- 2.3 Members will be generally aware of the content of the consultation document through the various member presentations and briefings that have taken place in recent months, including the Joint Member Conference with Districts,

which took place on October 19. This report therefore does not attempt to repeat or summarise the consultation document in any detail.

- 2.4 The Regional Planning Issues Panel has met twice, on 20 November and 3 December, to consider the consultation document and the County Council's possible response to it. The Panel having considered these matters in some detail commends the content of the response as set out in this report.

### **3 Conclusions**

- 3.1 Members will be aware of the importance of Regional Planning Guidance (RPG) in terms of setting the context for all other planning documents prepared by Local Planning Authorities. It will eventually set the overall scale and distribution of development in the region, including the distribution of housing figures to the "sub regions".
- 3.2 In addition, under the proposals to reform the planning system, RPG or its replacement Regional Spatial Strategies will assume even greater status, with local planning authorities having to conform to the policies and proposals within these documents, rather than simply having regard to their content, as is currently the case.
- 3.3 The comments and responses set out in this report represent a cohesive and sustainable approach to development in the region. The consultation document at the moment does not provide the sense of a comprehensive and cohesive approach to planning in the region. This reflects to a large extent the speed at which work is progressing on the RPG in the context of major strategic planning issues such as airport policy and the outcome of Multi Modal Studies still being unresolved. Given these circumstances and the fact that this is a new Region which is quite obviously struggling to understand a number of key planning issues and relationships, it is proposed that the County Council should as part of its response, submit that preparation of the RPG should be delayed.

## **1. Background**

- 1.1 The East of England Local Government Conference (EELGC) launched its consultation document setting out the options for Regional Planning Guidance (RPG14) for the East of England on 20 September. This represents the first major stage in the preparation of Regional Planning Guidance for the new East of England Region. The period of public consultation ends on Monday 16 December.
- 1.2 There have been a number of Member presentations and briefings on the content of the consultation document. The consultation period commenced with Stakeholder briefings by the EELGC in Letchworth. There has also been the joint conference with District Councils, which took place on 19 October, with a view to gaining a better understanding of the content of the consultation document and SERAS, and highlighting common areas of concern.
- 1.3 In terms of formal process, the newly established Regional Planning Issues Panel has met twice, on 20 November and 3 December to consider and discuss a possible response to the consultation document.
- 1.4 The consultation document asks for views on 60 questions, relating to a wide range of issues covered in the consultation document. In general terms it is considered that these questions provide a satisfactory framework for the County Council to make its response. At Appendix 1 of this report can be found the proposed responses to the 60 questions, which have been discussed by the Regional Planning Issues Panel and recommended for endorsement by Cabinet.
- 1.5 Notwithstanding the detailed response to the consultation document's questions, it is considered that the County Council's response should also raise a number of major and overarching issues in the form of an introduction. This approach assists in picking up the interdependence of a number of the key issues and decisions that need to be taken. The lack of clarity about the interrelationships between different issues and topics, is one of the major points of concern about the consultation document. In addition, it enables the County Council to raise the issue of the timetable for the progression of the RPG, which gives cause for concern on a number of grounds and largely explains why at present the consultation document appears confusing or unclear about a number of issues.
- 1.6 It is proposed that the introduction to the County Council's response should raise the following issues as set out below.

*Timetable for Preparation of RPG 14*

- 1.7 The EELGC has not invited responses on the proposed timetable for preparation of RPG14, as set out on page 4 of the consultation document. However HCC objects strongly to the proposed timetable.
- 1.8 The published timetable based on the submission of draft RPG to the Secretary of State in mid 2003 would require the substantive technical work to be accomplished within the next three months. It should be recognised that the East of England is a new Region for the purposes of preparing Regional Planning Guidance. It is therefore essential that fundamental issues and relationships within the region are fully understood before the preparation of the RPG. It is clear from the consultation document that much work still needs to be completed before that understanding is in place.
- 1.9 More specifically, the timetable will not enable consideration of several fundamentally important matters about which key information will not be available or Government decisions not yet made, notably:
- Analysis of full 2001 Census results, especially to inform new demographic and labour market analysis.
  - Forthcoming Government decision on SERAS – now likely to be delayed possibly until early 2004 and which will have fundamental implications for spatial strategy and transportation priorities.
  - A review of the Regional Economic Strategy (RES), especially to reflect the concerns expressed by the Regional Assembly about the flawed technical basis for the growth aspirations in the current RES.
  - Conclusion of London-South Midlands Multi-modal Study – not due until early 2003.
- 1.10 Whilst the County Council (HCC) understands the desirability of producing RPG14 as quickly as possible, it would clearly be unsatisfactory for the content of draft RPG14 to be based on unsubstantiated speculation about the above matters. Consequently to adhere to the current timetable would mean that the EELGC could produce no more than a bland and provisional draft RPG devoid of substantive content on the key issues that all recognise to be most important - and most controversial.
- 1.11 It is true that information and decisions on the above matters should be available in time to inform the public examination into a draft RPG14 if this were to take place in 2004, as currently scheduled. However, this is no reason to press ahead with the current timetable. The preface of PPG11 states that:

*'This PPG ... places greater responsibility on regional planning bodies, working with the Government Offices and regional stakeholders, to **resolve** [emphasis added] planning issues at the regional level through the production of **draft** [emphasis added] RPG. This promotes greater local ownership or regional policies and*

*increases commitment to their implementation through the statutory process’.*

- 1.12 Clearly therefore the Government rightly accepts that the role of the Regional Planning Body – the EELGC – is to exercise its locally representative democratic mandate in trying to resolve key planning issues in preparing **draft** RPG, rather than at the subsequent and democratically much less accountable public examination and modifications stages when local authorities will have much less influence.
- 1.13 Consequently, HCC recommends that the timetable be extended by about 12 months, to allow the full discussion and resolution of the issues listed above.

#### *Population and Housing Growth*

- 1.14 A number of demographic considerations, including the need to take account of the 2001 Census, must be taken into account in deciding on housing requirements. These considerations have been outlined in the response to question 9. If the current timetable for preparing RPG14 is adhered to, then HCC recommends that an initial and provisional average annual rate of housing development in the region as a whole be set somewhere in the range between the lowest scenario (‘C’, about 19,300) and continuation of the rate in existing RPG6/9 (about 20,850). Rounded to the nearest thousand, this equates to an annual rate in the range 19,000 to 21,000. There is no sound technical justification for a higher rate at this stage.

#### *Development for employment growth*

- 1.15 The County Council has already expressed concerns about EEDA’s Regional Economic Strategy (RES)( see response to question 10). HCC recommends that RPG14 should not make land use plans for the level of economic and additional population growth that would be required to achieve the current RES growth aspirations. Instead, further work with EEDA is needed to reformulate the GDP aspirations in the Regional Economic Strategy and recalculate what will be achievable over the whole period of RPG14 to 2021. Recalculation will need to use updated population and other relevant information and have regard to the growth aspirations of adjacent regions. It will be important to plan for a level of net out-commuting to London that will be sufficient to support the Mayor’s plans for economic growth to secure the Capital’s regeneration and renaissance aspirations, and to maintain its status as a competitive World City.

#### *Spatial development strategy and sub-regions*

- 1.16 The four spatial scenarios put forward in the consultation document are not mutually exclusive choices and elements from several will need to be combined. Two fundamental drivers in formulating the strategy should be:
- To support urban renaissance, especially at the regions larger centres – notably Colchester, Ipswich, Bedford, Peterborough and Norwich

- In line with the RPG’s social progress and inclusion principles, give priority to increasing economic performance and prosperity in the currently under-performing and disadvantaged parts of the region.
- 1.17 The difficulties to date in making progress with economic regeneration in under-performing areas, and with wider urban renaissance goals in all the main settlements, can be attributed in large part to a legacy of inadequate Government funding for physical and social infrastructure improvements, and the failure to build the capacity of communities to support regeneration. Whilst the most obvious deficiencies have been in relation to transport, a range of ‘social’ infrastructure such as education & skills facilities to address skills shortages and support entrepreneurship, town centre enhancements and more affordable housing are also crucial in order to help ‘kick start’ inward business investment and faster economic growth. Greatly increased expenditure on infrastructure will be needed to assist the less prosperous areas and all the major centres, particularly up to around 2011, if significant early progress on the social inclusion and urban renaissance aims of RPG14 are not to be frustrated.
- 1.18 Recent experience and current Government spending plans suggest that total public expenditure on infrastructure will continue to fall far short of the sum of local authority aspirations for what is required. This means that there will need to be hard choices about the distribution of funding for infrastructure in the Region. In making those choices, it will be important that the spatial strategy does not drain essential public investment away from less prosperous areas and into in the more economically buoyant parts of the region simply to deal with worsening congestion and other impacts of ‘over heating’ in consequence of unconstrained growth. This would be the unintended but predictable consequence if scenario 3 were to be pursued.
- 1.19 HCC recommends an overall spatial strategy for the region that combines elements principally from scenarios 1,2 and 4 and that can be summarised as follows.
- (a) Focus major economic and housing growth during the early part of the RPG14 period at the main urban areas, especially the larger regional centres identified on Figure 5 of the consultation document, Thames Gateway and in the already defined Priority Areas for Economic Regeneration.
  - (b) Prioritise early Government funding for infrastructure to give adequate support for the focus of major growth in (a) above and possibly other PAERs that might be identified, such as Bedford.
  - (c) Proceed on the basis that the London-Stansted-Cambridge study area is not a functional sub region (paragraph 7.15 of consultation document), and instead identify in RPG14 the Cambridge sub region and the “ Arc Around London”:

- In the Cambridge sub-region, support the current approach and scale of growth being considered through the Cambridge Structure Plan Review. However, RPG14 needs to recognise that further growth in this sub-region after 2016 may be appropriate over and above that for which the current Cambridgeshire Structure Plan Review provides. The scale of any further increase in growth in the longer term, if any, would depend in particular on the Government's decision on the scale of expansion at Stansted Airport. HCC is strongly opposed to further runways at Stansted. (See appended response to the SERAS consultation.) However, if there is to be major expansion at Stansted then it might be necessary to consider whether an appropriate response to the resultant growth pressures should include a new settlement, well located in relation to rail and road links, between Cambridge and Stansted.
  - In the Arc Around London, constrain growth at least until around 2016 to that which can be provided without having to divert resources for essential infrastructure to support (a) & (b) above. RPG14 should adopt an approach to managing development pressures in the Arc similar to that for the 'Western Policy Area' in RPG9. The response to Question 22 outlines what would be involved.
- (d) If - contrary to the view of this Council - the Government's forthcoming decisions on SERAS include additional runway capacity at Stansted Airport, then recognise that major expansion at Harlow may be a sustainable way to accommodate significant extra growth in the longer term close to the Airport. See response to question 21.
- (e) In that part of the Milton Keynes / South Midlands study area within the East of England, take forward the preferred option in the study providing the underlying analysis is sound. This would involve focusing growth on five areas including Bedford and Luton/Dunstable. See response to question 20.
- (f) Recognise that in the longer term the priority for infrastructure investment will probably need to shift away from the currently less prosperous parts of the region to other growth areas as these develop, including new settlements, and to pressured parts of the London Arc.
- (g) Recognise that no major changes to Green Belts are necessary at this stage, except possibly to enable longer term expansion of the Harlow and Luton/Dunstable PAERs, the latter as part of an overall package of growth in the Milton Keynes & South Midlands study area. (See response to Questions 16 and 20.)

*Housing distribution*

- 1.20 Pending reorganisation of the planning system, RPG14 should use existing strategic planning areas for the purpose of sub-regional housing distribution, i.e. structure plan areas as in existing RPG6/9. It would still be possible for RPG14 to indicate approximately the contribution that specific growth areas should make to dwelling provision in each of the counties. The forthcoming legislation to reorganise the planning system may clarify what will be most appropriate sub-regional planning arrangements to apportion county level figures in RPG14 between district and unitary areas. However HCC recommends that, realistically, any move to making the housing distribution on the basis of a complete coverage of differently defined sub-regions will need to await the first review of RPG14.

*Affordable housing*

- 1.21 HCC is extremely concerned that the issue of affordable housing has not been given sufficient weight in the consultation document. It is considered that the targets and approach outlined in the document are inadequate and will be unhelpful to Local Planning Authorities in those parts of the Region affordability problems are reaching critical conditions. HCC recommends that affordable housing targets for the region should be allowed to better reflect local circumstances and housing conditions, within a context of the overall target being far more ambitious.

# Appendix 1

## RESPONSES TO QUESTIONS IN CONSULTATION DOCUMENT

### Chapter 3: Vision, Aims and Objectives

1. Do you agree with RPG14's vision? If not, what changes would you make and why?
2. Do you agree with RPG14's strategic aims? If not, what changes would you make and why?
3. Do you agree with RPG14's objectives? If not, what changes would you make and why?

Hertfordshire County Council (HCC) supports the proposed vision, aims and objectives for RPG14. However it notes that there is no explicit reference to coastal management in response to climate change and rising sea levels – an important issue for the region given its long and in places populous coastline. HCC therefore recommends that objective xii be amended to read '*... whether for transport, utilities including coastal management or social infrastructure ....*'

### Chapter 4: Spatial Strategy for the East of England

4. Do you agree that the key principles from existing RPGs should be continued in RPG14? If not, what changes would you make and why?

The County Council supports most of the key principles set out in paragraphs 4.3 to 4.5 of the consultation document. However the second and third 'bullets' under paragraph 4.7, in relation to economic development, need to more explicitly refer to the need to reduce disparities in economic performance between different parts of the region. This will require an attempt at some degree of planned intervention in the distribution of economic growth, rather than as currently stated simply '*supporting economic growth in areas with strong economic potential*'. HCC therefore **recommends** that the second and third 'bullets' at para 4.7 be replaced with text along the lines of the following, which is based on para 3.5(5) in RPG9:

*'Economic opportunities should be increased by raising skills levels and reducing the disparities between different parts of the Region. In particular, by positive investment strategies for priority areas of economic regeneration and the Thames Gateway, to improve the performance of poorer parts of the Region and by managing the localised impacts of development in economically buoyant areas'.*

**5. Do you agree with the spatial principles suggested for RPG14? If not, what changes would you make and why?**

*HCC supports all of the principles set out in paragraphs 4.8 to 4.17.*

**6. Do you agree that existing RPG policy for the Cambridge sub-region should be continued without major change?**

In the short term, yes but subject to response to question 19 which it may be helpful to repeat here. HCC considers that further growth in this sub-region after 2016 may be appropriate depending in particular on the Government's decision on the scale of growth at Stansted Airport. This might involve another new settlement in the longer term, which is well located in relation to the rail and road network, ideally located between Cambridge and Stansted.

**7. Do you agree that RPG14 should continue existing Thames Gateway policies? If not, how should RPG14 address the Thames Gateway's needs and why?**

**8. Do you agree that the Thames Gateway, especially South Essex, needs significant investment in transport infrastructure? What do you think should be the priorities for future investment?**

Yes to both questions. The response to question 19 emphasises the need for early investment in infrastructure to give priority to improving the economic performance of PAERs and the Thames Gateway. See responses to questions 13 and 40 in relation to a possible lower Thames crossing and other transport priorities of regional significance. Clearly it will be for Essex consultees to consider the detailed local priorities.

General investment in transport infrastructure in the Thames Gateway is not, in general, a significant issue for Hertfordshire provided that there is an appropriate balance between road and rail provision. The Lower Thames Crossing, however, has wider implications. See response to question 13.

## Chapter 5: Major Issues

### *9. How should RPG14 respond to: the overall likely long-term increase in regional population; the apparent increase in the rate of population movement into the East of England from London; the apparent change in the rate of household formation?*

These questions relate to population and household growth, and therefore the key decision on what overall rate of housing development should be set in RPG14 for the region as a whole. Table 2 on page 26 of the consultation document compares the average annual rate of housing provision in the region in existing RPG6/9 with four illustrative housing growth scenarios. One of these scenarios is lower than RPG6/9 and three are higher. The scenarios can be ranked in magnitude of growth rate as follows, beginning with the highest:

D	Assumes that net in-migration in future will continue at the relatively high rate experienced since 1995	27,300
B	Assumes that net in-migration in future will reflect the average during the longer period since 1980	22,800
A	Based on the most recent (1996-based) sub national household projections	21,700
Current RPG6/9	Housing figures were informed by the 1996-based projections but were not based on simple 'predict and provide' calculation	20,850
C	As for Scenario B, but assuming a lower rate of household growth relative to population, i.e. a large average household size	19,300

Ideally, decisions on housing requirements should be informed by new ONS sub-national population and corresponding ODPM household projections to 2031 based on the results of the 2001 Census. However, these projections are not expected to be produced until late 2004. This is too late to inform preparation of draft RPG14 if the current timescale is not extended, as HCC recommends. If draft RPG is to be prepared by mid 2003, then it is necessary to consider the existing and very inconclusive evidence as to whether the rate of housing development in RPG14 should be set initially higher, lower or about the same as in existing RPG6/9.

A higher rate of provision in RPG14 might be considered for the following main reasons:

- i) Preparation of existing RPG6/9 was informed primarily by the 1992/93 and (in the later stages) 1996-based population and household projections. However the 1996 population projections have now been superseded by higher 1998 and 2000-based ONS national projections. The increase is due mainly to an assumption of higher net international migration into the UK than in the 1996-based projections.
- ii) London's draft Spatial Development Strategy sets an ambitious target to accommodate most of its projected increase in population within the Capital, with no significant increase in out-migration from London to surrounding areas. However, the net outflow may be higher if either international

migration through London increases further, and/or London's housing targets as part of urban renaissance are not achieved.

- iii) The Government recognises that housing supply is an important factor in supporting the economy, especially in maintaining labour supply (para 8.2 of RPG9). An increase in the rate of housing development might be proposed to meet the high economic growth aspirations in the East of England Regional Development Agency's current Regional Economic Strategy.
- iv) Some have suggested that the shortage of affordable housing, already acute in many parts of the region, is due mainly to demand outstripping supply which is fuelling growth in house prices/rents relative to earnings.

However, any increase on the current rate of provision in RPG6/9 (i.e. scenarios A, B and D) may be questioned for the following main reasons:

- (a) Scenario D assumes the pattern of migration into the region will reflect the higher rates experienced in the late 1990s. This reflects the particularly high level of international migration mainly via London since 1998. This may not continue. Until new national household projections are published – and accepted at the political level - it will be more prudent to assume that average migration into the region to 2021 will reflect the long run trend from 1981 to 2000 (Scenario B) rather than the higher rate experienced in the shorter period since 1995 (Scenario D). On this basis the highest rate of housing provision, under Scenario D, is much too high.
- (b) The 2001 Census population is the basis for the 2001 mid-year estimate of a total population in the region of 5,395,000. This is directly comparable and less than the projected population in 2001 in the ONS 1996-based national projections (5,448,000 on which, significantly, the 1996 household projections were based) and 2000-based short term national projections (5,496,000). It is understood that ONS ascribes the differences mainly to errors in assumptions about international migration and will be making downward revisions to previous estimates of net migration and population all the way back to 1981. On the basis of the new population figures it seems that, contrary to expectations in some quarters, the next set of national household projections may be no higher and may even be lower than the 1996-based household projections. This would be due to both a lower base population figure from 2001 onwards than previously supposed and a lower trend in population growth. The latter consideration implies that, other considerations such as migration and life expectancy apart, housing growth Scenarios A and B are both too high.
- (c) The rate of provision calculated for Scenario C is the lowest of the scenarios and is lower than in current RPG6/9. This is based on making the assumption of a long term 'sea change' in the relationship between population and household growth. The 'apparent change' in the rate of household formation referred to in question 9 was based on research recently

commissioned by EELGC<sup>1</sup>. That work assumed the latest population estimates and projections to be robust, but that assumption is now questionable given the lower than expected 2001 Census population. An indisputable fact remains that, at the national level of analysis, the 1996-based household projections were lower than the earlier 1992-based projections mainly because of a downward revision to earlier assumptions about the rate at which separate single person households would form. (More people are cohabiting than was previously supposed.) It is therefore entirely plausible that the forthcoming 2002-based household projections will reflect a further, albeit probably small, downward revision to the calculation of household formation relative to population.

- (d) The most recent data on dwelling vacancy suggests that the assumption, in all the scenario calculations, of an average 3% vacancy rate (in line with current Government aspirations) may be too high. In Hertfordshire the vacancy rate has now reduced to only 2.2% but it remains higher in other parts of the region. Achievement of a region-wide reduction of just 0.5% in the vacancy rate in the total dwelling stock between 2001 and 2021 would reduce the need for additional dwellings under any of the scenarios A to D by about 700<sup>2</sup> dwellings per annum.
- (e) As regards housing capacity in London, there is no evidence that the Mayor's aspirations for housing provision as part of urban renaissance will not be achieved. Moreover future housing pressure in the Capital may be less than currently supposed given that ONS now accepts that it has systematically over-estimated net in-migration since 1981 and may be expected to adjust its projection of migration accordingly.
- (f) As regards labour supply, any boost to housing provision intended to increase the availability of labour within the region would need to be consistent with other regions being able to retain sufficient labour to achieve their economic growth aspirations. Urban renaissance and social inclusion objectives in less prosperous regions are unlikely to be assisted by net movements of skilled labour towards relatively more prosperous regions such as the East of England.
- (g) As regards house prices and affordability, there is recognition that factors other than supply are playing an important role in driving up housing costs. For example, a recent study by the Bank for International Settlements concludes that the most significant factors in house prices have been rising national income, declining share prices (making property appear a relatively better investment) and stable low interest rates (making larger mortgages more affordable). Similarly the Halifax in its most recent survey of house prices points to the important role of low interest rates and low unemployment in

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<sup>1</sup> *The official 1996-based projections of population and households in the East of England Region: Appraisal and Analysis* by Alan Holmans, Cambridge Centre for Housing and Planning Research, May 2002

<sup>2</sup> 0.5% of a minimum total dwelling stock in 2021 of about 2,700,000 is about 13,500. This equates to 675 per annum over a 20 year period.

pushing up house prices. Consequently it is questionable what impact even a big increase in annual house building over and above what is already being planned would have on prices and rents. Governments cannot make developers build houses. If developers were to respond to higher planned housing figures mainly by increasing supply in the more economically buoyant regions – such as the East of England, then any theoretical reduction in prices due to increased supply might be offset by price competition as a result of higher house building inducing higher in-migration.

- (h) Finally, it is questionable whether house builders could necessarily implement a significant increase in house building, at least in the period to 2011, due to skills shortages in the construction industry and uncertainty about whether the current strength of the housing market will persist. Any loss of market confidence could have disproportionately serious consequences for achieving planned development in relatively less buoyant areas of the Region (as has happened in Kent in recent years including much of Thames Gateway).

Paragraph 8.3 in RPG9 and the Deputy Prime Minister's statements on 18 July and 31 October may be interpreted to imply a Government view that RPG 14 and revised RPG9 will need to set a higher level of housing provision than in existing RPG6/9. However the above considerations (a) to (h), especially the new Census population figures, mean that the Government will surely wish to reconsider whether a higher overall rate of growth is now necessary. The Deputy Prime Minister's intention to see accelerated development in the potential growth areas appears primarily to redress an emerging region-wide shortfall in meeting the existing provisions of RPG6/9. Emerging plans for the growth areas will doubtless have ramifications for the distribution and timing of development across the regions, but this does not imply that the overall rate of development in the East of England should necessarily increase.

In view of considerations (a) to (h) above, if the current timetable for preparing RPG14 is adhered to then HCC recommends that an initial and provisional average annual rate of housing development in the region as a whole be set somewhere in the range between the lowest scenario (C, about 19,300) and continuation of the rate in existing RPG6/9 (about 20,850). Rounded to the nearest thousand, this equates to an annual rate in the range **19,000 to 21,000**. There is no sound technical justification for a higher rate at this stage.

2002-based ONS household projections will not be available in time to inform the public examination if this is held in early 2004. However, at that stage should be possible to consider whether the provisional rate in draft RPG needs to be amended either upwards or downwards to take account of the following:

- Interim 2001-based national-level population projections that are due to be published soon by the Government Actuary's Department – the figures may indicate to what extent the next sub-national population and household projections will be influenced by reduced migration assumptions;
- 2001 Census data on factors other than population that influence household projections (e.g. marital status and household characteristics) ;

- Scope to bring down the regional average vacancy rate closer to the level already observed in Hertfordshire.

It may also be possible to inform the public examination by updating the figures for Scenarios A to D to reflect revised assumptions on the above matters (albeit not based on new ONS projections). Whatever rate is set in RPG14 will need to be reviewed regularly in line with the ‘plan, monitor and manage’ approach.

#### *Employment generating development*

The issue of how much growth in employment generating development will be required is considered in responding to questions 10 and 11. However, in relation to question 9 it is important to stress that additional employment development should be in line with an assessment of growth in the labour force based on the same population assumptions that inform housing requirements. A higher level of employment development, for example to achieve particular economic growth aspirations, should only be contemplated if major changes in inter-regional commuting flows are considered realistic and planned in agreement with adjacent regions, notably Greater London. See response to questions 10 and 11.

**10. How should RPG14 respond to the RES aspiration that the region should reach 20th place in the rankings of EU regions by 2010?**

*HCC has already expressed grave reservations to EEDA about both the appropriateness and the realism of this aspiration. In essence:*

- i) The Regional Economic Strategy (RES) rightly includes a number of aspirations and the relative importance of this particular aspiration in relation to GDP growth should not be over-emphasised in formulating RPG14. In particular, RPG14 must have regard to RES aspirations in regard to social inclusion and improving economic performance in the less prosperous parts of the region.*
- ii) The RES/GDP sub-regional studies recently completed on behalf of EEDA and its partners clearly indicate that the aspiration that the region should reach 20th place in the rankings of EU regions by 2010 is unattainable.*
- iii) The GDP aspiration has, in any case, been calculated on an inappropriate basis, namely employment-based rather than residence-based GDP. This fails to recognise the inter-dependence of the region with London and the income earned in London by commuters resident in the East of England. A residence-based calculation would be more appropriate and would result in the Region being ranked higher in GDP compared with other regions. In consequence the scale of further economic growth needed to rise higher would be more realistic.*
- iv) The regional development agencies need to liaise more closely to avoid the absurdity implicit in too many regions aspiring to achieve too much relative to other parts of the EU. Paragraphs 4.41-42 of the sustainability appraisal of the consultation document comment that:*

*‘The East Midlands Regional Economic Strategy sets the aim to be a top 20 region (undefined) in Europe by 2010, the south East Regional Economic Strategy target is to be a top 10 Region, and London is envisaging considerable growth (both in population and economically) over the same period. ...The competition between regions is already beginning to show in the tensions between the economic targets being set and the ability of the regions to deliver them sustainably. There appears to be little integration between neighbouring regions as to how the pursuit of these targets will affect one another.....’*

*HCC therefore recommends that RPG14 should not plan for the level of economic and additional population growth that would be required to achieve the current RES growth aspirations. Instead, further work with EEDA is needed to reformulate the RES GDP aspirations and recalculate what will be achievable over the longer, more realistic period of the RPG14 to 2021. Recalculation will need to use updated population and other relevant information and have regard to the growth aspirations of adjacent regions. It will be important to plan for a level of net out-commuting to London that will be sufficient to support the Mayor’s plans for economic growth to secure the Capital’s regeneration and renaissance aspirations, and to maintain its*

*status as a competitive World City. In addition far greater emphasis should be placed on meeting the growth aspirations for the Region through increasing productivity rather than increasing the workforce by encouraging in-migration.*

*The project board for the RES/GDP sub-regional studies has already agreed that more detailed analysis may be necessary at sub regional level, and this should be used to further inform RPG.*

***11. How should RPG14 respond to economic growth pressures in Hertfordshire and south-west Essex?***

***15. How should RPG14 respond to the spatial, economic and other relationships between the East of England and Greater London?***

The issues raised by questions 11 and 15 overlap and so it makes sense to respond to them together. Related transportation issues are covered by the response to question 22. See also the response to question 21 on the London-Stansfeld-Cambridge study. HCC considers that:

- i) RPG14 needs to recognise the role of the Counties which surround London in supplying skilled labour, to enable London to maintain and develop its status and success as a World City. This is likely to require existing net commuting flows into London to stay at current levels or even to increase, with consequent implications for the scale of labour supply in the ‘commuter belt’.
- ii) For reasons identified in the response to question 19, RPG14 should recognise an “ Arc Around London”, which in the East of England comprises most of Hertfordshire and South West Essex. The Arc would exclude PAERs and its central section would extend up to the Cambridge sub-region. Early growth (e.g. up to around 2016) in the Arc would be constrained to that which can be achieved without having to divert resources for essential infrastructure to support the successful implementation of policies for the PAERs, Thames Gateway and main urban centres in the Region.
- iii) Within the “Arc Around London”, RPG14 should take an approach to managing development pressures similar to that for the ‘Western Policy Area’ in RPG9 (Policy RE8, on page 44). Within the constraints on the overall scale of development imposed by (ii) above, such an approach would involve developing positive strategies for areas in the Arc where congestion or labour or land shortages are constraining economic growth. It will be important to continue to accommodate ‘footloose’ inward investment in activities that have a particular reason to locate in the Arc (for example to strengthen already established knowledge-based clusters) and so which would be difficult to encourage to locate in other parts of the region instead.

***12. Do you agree that road-user charging is, in the end, inevitable? If not, how should RPG14 respond to traffic growth, congestion and environmental problems on the strategic and local road networks?***

Road-user charging on parts of the network is likely to have major traffic displacement effects, some of which may even run counter to the desire to reduce traffic levels. The alternative is to have charging on the whole network which could prove prohibitively expensive to introduce and be likely to require decisions at a national level. Charging also has an impact on social inclusion issues, and the ability to apply universal charging to a region as diverse as the East of England has to be questioned, particularly in respect of rural areas where alternatives are more limited.

A clearer view on whether road-user charging is inevitable will only be possible once the impacts of the forthcoming London project are known. In the meantime, the range of measures such as investing in and promoting alternatives to the car, parking policies and land use planning need to be employed.

***13. How should RPG14 address the Lower Thames Crossing issue? What balance should be struck between regional and national issues?***

As noted in the text of the consultation document, the construction of Lower Thames Crossing for road traffic is likely to increase demand and lead to pressures to upgrade existing roads or develop new routes to create what in effect would be an outer orbital road route. Such developments are likely to be counter to, in whole or parts, the future road network strategy for Hertfordshire, and would require a major rethink to the regional road hierarchy as set out in Section 10 of the consultation document.

The alternative of a rail crossing may also lead to pressures for an orbital rail route. This would have benefits for addressing the east-west passenger transport movements in the south of the region, but there would still be major environmental impacts of providing new infrastructure.

***14. What role should gateways have in spatial strategy, in relation to, for example: economic growth, sustainable transport, other centres of economic activity i.e. major cities and towns?***

The gateways have the potential to support and develop HCC's preferred spatial strategy for the Region. Given that many of the major gateways, particularly the ports such as Harwich and Felixstowe are located in peripheral areas which are in need of regeneration, policies to maximise the economic and social benefit of investment in these areas should be developed. This will assist in achieving the balanced approach to growth across the Region which HCC supports.

It should also be noted that the gateways will need to have appropriate transport links, and therefore should be part of the network of transport nodes identified in Section 10.

***16. What approach should RPG14 adopt on green belt in relation to other issues discussed in the spatial strategy?***

*Hertfordshire is the most highly constrained county in the Region in terms of the extent of the Green Belt. All but one of its 29 main settlements are tightly circumscribed by inner Green Belt boundaries. It is vital that Green Belts continue to be accorded the highest level of protection in RPG14. This is not only to protect accessible and highly valued countryside near towns but, arguably more important still, to assist in concentrating development within existing urban areas in line with urban renaissance - the basic strategy in both national and regional planning policy.*

*HCC supports the EELGC's initial view (paragraph 5.57 of consultation document) that there is no need for a wholesale review of Green Belts, but that RPG14 should be ready to recommend a limited review if it is shown necessary in specific areas to support major strategic policy proposals. However this will only be the case where sub-regional dwelling requirements are such that a significant scale of green field development will be necessary and strategic scale Green Belt releases would be the most sustainable approach.*

It would then be for structure plans – or any replacement sub-regional planning arrangements to identify the general location and scale of releases to be made in local plans, in the public knowledge that such controversial decisions are what the Government intends.

Apart from at Cambridge, RPG14 may need to identify a need for limited reviews to the Green Belt as part of a wider package of measures to promote economic growth and regeneration of Priority Areas for Economic Development, notably Luton/Dunstable and possibly Harlow. See response to question 22.

***17. How should RPG14 address possible long-term climate changes?***

***18. How should RPG14 address water resource issues in the region?***

HCC does not consider that it has the necessary information to comment on these questions at present. It is understood that a Regional Climate Change Study has been commissioned and once this study is available HCC will be in a better position to respond to these points. In addition it is understood that the Environment Agency are carrying out work to assess the impact on the water environment of the various growth options, spatial strategies and sub regional proposals, and this work should be used to inform the next stage of RPG preparation.

## Chapter 6: Spatial Scenarios

### **19. Which spatial scenario offers the best basis for RPG14 spatial strategy? Which elements of the scenario, if any, would you leave out and which elements of other scenarios, if any, would you add to it?**

The consultation document puts forward four possible spatial strategies:

- 1 Continuation of the existing regional policies
- 2 Building on the strengths of key regional centres
- 3 Building on regional strengths
- 4 New settlement (or settlements as a prime location of growth)

*The formulation of these possible strategies has been valuable in promoting fresh thinking. However, as stated at paragraph 6.2 of the Options Consultation Document they are not mutually exclusive choices and Hertfordshire County Council considers that what goes into the final RPG14 will need to be a blend of several ‘scenarios’. Rather than comment on these scenarios in turn, it is considered more helpful to identify fundamental issues and how these should shape formulation of a durable spatial strategy.*

Whilst the East of England is one of the more prosperous regions of England, income per capita, employment rate and other indicators of social equity and inclusion are not evenly distributed across the region. Much of Hertfordshire, West Essex, the Cambridge sub region and parts of the other counties have buoyant economies, but other areas are under-performing in terms of the social progress and inclusion principles on page 19 of the consultation document. The under-performing areas comprise the Essex part of Thames Gateway, the various priority areas for economic regeneration listed at paragraph 8.14 of the consultation document and arguably other areas where the economy is under-performing, such as Bedford.

Moreover, as noted in paragraph 4.14 of the consultation document, the self sustaining urban renaissance of the regions larger centres – notably Colchester, Ipswich, Bedford, Peterborough and Norwich - *‘requires a strong local economy ..... and sustained investment in the urban realm, local transport facilities and services available to the population. Urban renaissance principles must be applied to all the region’s urban areas, not just those seen as regeneration priorities.’*

The difficulties to date in making progress with economic regeneration in under-performing areas, and with wider urban renaissance in the other main settlements can be attributed in large part to a legacy of inadequate Government funding for physical and social infrastructure improvements, and the failure to build the capacity of communities to support regeneration. Whilst the most obvious deficiencies have been in relation to transport, a range of ‘social’ infrastructure such as education & skills facilities to address skills shortages and support entrepreneurship, town centre enhancements and more affordable housing are also crucial in order to help ‘kick start’ inward business investment and faster economic growth. Greatly increased expenditure on infrastructure will be needed to assist the less prosperous areas and all

the major centres, particularly up to around 2011, if significant early progress on the social inclusion and urban renaissance aims of RPG14 are not to be frustrated. Achieving an effective balance in this investment is critical for a successful spatial strategy for the Region.

Recent experience and current Government spending plans suggest that total public expenditure on infrastructure will continue to fall far short of the sum of local authority aspirations for what is required. This means that there will need to be hard choices about the distribution of funding for infrastructure. In making those choices, it will be important that the spatial strategy does not drain essential public investment away from less prosperous areas and into in the more economically buoyant parts of the region simply to deal with worsening congestion and other impacts of 'over heating' in consequence of unconstrained growth. Hertfordshire County Council is concerned that this would be the unintended but predictable consequence if scenario 3 were to be pursued, so it is important to expand on this concern here.

Scenario 3 is entitled 'building on regional strengths', but could equally be dubbed 'support faster growth in what are already the more successful areas to fulfil EEDA's current growth aspirations'. This scenario would involve a significant acceleration of economic development and a correspondingly much larger proportion of regional housing provision in what the consultation document terms the 'Arc Around London', i.e. much of Hertfordshire and parts of South West Essex. Under this scenario, growth in these areas would be needed early, i.e. in the period before 2016 when the need for infrastructure improvements in less prosperous parts of the region will be crucial.

Scenario 3 would require a step increase in the share of overall Government expenditure on infrastructure in the Region that is directed to the Arc Around London. The increase would be needed just to prevent a worsening of existing transport congestion in what is already the most congested part of the region. For example action would be needed to lift capacity constraints on the M25 by 2011, which is not currently being promoted by the Government, and to prevent gridlock on many stretches of the road and rail network close to London.

An example of how congestion is already frustrating current economic development aspirations is provided at Leavesden near Watford. Here, a major 'knowledge-based' business park proposal in line with the County's economic development strategy was at risk and due to Highway Agency objections in regard to access, notably in relation to capacity constraints on the adjacent A405 east-west trunk route. Such cases do not bode well for further economic growth under scenario 3 unless the rest of the region is prepared to relinquish a significant part of its claim on infrastructure spending.

Moreover, businesses in Hertfordshire have identified the shortage of affordable and key worker housing as a particularly serious constraint on maintaining, let alone increasing, economic performance. In consequence a larger share of Housing Corporation funding would need to be directed to the Arc Around London if faster economic growth in the part of the region were to become policy.

The above concerns about scenario 3 are highlighted in the summary of the sustainability appraisal of scenarios at Table 4 of the consultation document.

HCC recommends an overall spatial strategy for the region that combines elements primarily from scenarios 1, 2 and 4, that can be summarised as follows. This summary complements the more specific comments on other major issues and particular sub-regions (questions 20 to 22).

- (a) Focus major economic and housing growth during the early part of the RPG14 period at the main urban areas, especially the larger regional centres identified on Figure 5 of the consultation document, Thames Gateway and in the already defined Priority Areas for Economic Regeneration such as The Lea Valley.
- (b) Prioritise early Government funding for infrastructure to give adequate support for the focus of major growth in (a) above and possibly other PAERs that might be identified such as Bedford, whilst meeting priority investment needs in the rest of the Region.
- (c) Proceed on the basis that the London-Stansted-Cambridge study area is not a functional sub region (paragraph 7.15 of consultation document), and instead identify in RPG14 the Cambridge sub region and a ‘Arc Around London’:
  - In the Cambridge sub-region, support current approach and scale of growth being considered through the Cambridge Structure Plan Review. However, RPG14 needs to recognise that further growth in this sub-region after 2016 may be appropriate over and above that for which the current Cambridgeshire Structure Plan Review provides. The scale of any further increase in growth in the longer term, if any, would depend in particular on the Government’s decision on the scale of expansion at Stansted Airport. Major expansion could be linked for example to a new settlement, well located in relation to rail and road links, between Cambridge and Stansted.
  - In the Arc Around London, constrain growth at least until around 2016 to that which can be provided without having to divert resources for essential infrastructure to support (a) & (b) above. RPG14 should adopt an approach to managing development pressures similar to that for the ‘Western Policy Area’ in RPG9. The response to Question 22 outlines what would be involved.
- (d) Depending on the Government’s forthcoming decisions on Stansted Airport, recognise that major expansion at Harlow may a sustainable way to accommodate significant extra growth in the longer term close to Stansted if (contrary to the view of this Council) additional runway capacity is built there. See response to question 21.

- (e) In that part of the Milton Keynes / South Midlands study areas in the region, take forward the preferred option in the study - providing the underlying analysis is sound - which involves focusing growth on five areas including Bedford and Luton/Dunstable.
- (f) Recognise that in the longer term the priority for infrastructure investment will probably need to shift away from the currently less prosperous parts of the region to other growth areas as these develop, including new settlements, and to pressured parts of the Arc Around London
- (g) RPG14 should not identify any major changes to Green Belts as necessary at this stage, except possibly to enable longer term expansion of the Harlow and Luton/Dunstable PAERs, the latter as part of an overall package of growth in the Milton Keynes & South Midlands study area. (See response to Questions 16 and 20.)

## **Chapter 7: Sub-Regions**

### ***20. How should RPG14 address the issues emerging from the Milton Keynes and South Midlands study?***

The study concludes that the study area, which spans three regions, has considerable potential for sustainable economic growth over the next 30 years. It puts forward a preferred option that focuses growth on five areas which include Bedford and Luton/Dunstable on the edge of Hertfordshire. One of the reasons for focusing growth at these areas is that the study concludes that at low growth levels these relatively weak local economies would continue to decline, whilst at higher growth levels they have more chance of regeneration. If this is correct, then HCC considers the preferred option to be acceptable in principle given the key strategic concerns raised in responding to question 19. However HCC would expect its relevant transportation priorities to be taken into account when detailed proposals are prepared for this part of the region.

### ***21. How should RPG14 address the issues emerging from the London-Stansted-Cambridge study?***

HCC agrees with the EELGC's initial view (paragraph 7.15 of consultation document) that the London-Stansted-Cambridge study area is not a functional sub region – it has links and connections to areas outside it, many of which are stronger than those within.

HCC recommends (in responding to question 19) that instead RPG14 should identify separately the Cambridge sub region and an “Arc Around London” sub-region comprising most of Hertfordshire and South West Essex, excluding the PAERs. The central section of the Arc would extend up to the Cambridge sub-region so as to avoid any ‘policy vacuum’ between these areas.

Whereas the Milton Keynes / South Midlands study puts forward a preferred growth option, the London-Stansted-Cambridge study does not. Instead the latter study goes only so far as to examine issues arising from combinations of three speculative growth scenarios and four possible spatial patterns. The lack of clear recommendations in the study is disappointing but not surprising given that whatever decision the Government reaches on the level of expansion of Stansted Airport will have profound ramifications for the scale and distribution of growth in the study area.

In response to question 9, HCC recommends that the overall rate of housing growth in the region should be set initially at about the current rate in RPG6/9. This does not of itself imply that the rate of growth in the study area should necessarily remain unchanged from present rates (corresponding to the lowest of the growth scenarios examined). However continuation of about the current rate in the study area is probably the right stance for draft RPG14. A significant increase in growth could be considered at the public examination stage if, contrary to the views HCC (see appended response on SERAS), the Government decides on developing further runway capacity at Stansted.

As paragraph 4.31 of the sustainability appraisal of the consultation document notes:

*‘Since the ability to attract businesses for which good air communications matter is one of the main justifications for airport expansion, it would seem perverse not to take advantage of this. Businesses prevented from locating near an expanded Stansted Airport will not necessarily locate elsewhere in the Eastern Region.’*

Consequently if a major expansion of Stansted Airport is announced it would be appropriate for the public examination to consider how best to respond to the consequent economic and housing growth pressures in a way that supports rather than hinders key planning priorities. HCC recommends that RPG14 should respond to major airport expansion by seeking:

- In the short and longer term, to direct economic growth pressures and locate additional housing needs arising so as to benefit regeneration of PAERs closest to the Airport, notably Harlow and the Lee Valley (mainly in London);
- In the longer term, after about 2016, possibly to direct some of the airport related growth to a new settlement between Stansted and Cambridge where the proximity of the Airport would support the continuing success of key economic sectors & clusters in that part of the region. See response to question 19.

One of the key findings of the London-Stansted-Cambridge study is to identify Harlow as a potential focus for major growth. The study states *‘that the long term development of Harlow plays a significant role in each spatial pattern: it is therefore a key location of future consideration and development’*.

A” Harlow Options Study” is already underway. This study will need to appraise all the options for major expansion into the Green Belt in Essex and/or northwards into Hertfordshire. The disadvantage with expansion north into Hertfordshire is that this area is increasingly noisy due to being under one of the main inward flight paths into Stansted Airport. An alternative of major expansion southwards might be combined with development of an entirely new town centre to the south of the existing centre at what would be a more central location for a greatly expanded settlement. Clearly any expansion would need to be planned in conjunction with investment to remedy deficiencies in transport infrastructure, notably east – west links in the road network.

**22. How should RPG14 address development pressures, regeneration needs, transport and other infrastructure constraints, and development constraints, in the Arc around London?**

See response to questions 11, 15 and, in relation to Harlow, 21.

**23. Do you agree the Peterborough-Huntingdon and the Fens could be recognised as a sub-regional focus in RPG14? What advantages or disadvantages would you see in such designation?**

- 24. Do you agree that Norwich could be recognised as a sub-regional focus in RPG14? What advantages or disadvantages would you see in such designation?**
- 25. Do you agree that Great Yarmouth and Lowestoft could be recognised as a sub-regional focus in RPG14? What advantages or disadvantages would you see in such designation?**
- 26. Should RPG14 support development of Great Yarmouth 'Eastport'?**
- 27. Would there be advantages in proposing any joint policies for Norwich and Great Yarmouth and Lowestoft sub-regions?**
- 28. Do you agree that the Haven Gateway could be identified as a sub-regional focus in RPG14? What advantages or disadvantages would you see in such designation?**

HCC has no specific comments on questions 23 to 28. However, as set out in the response to Question 19, HCC's preferred approach to the Spatial Strategy, which attempts to achieve a balance of growth across the Region, would point to some of the above locations being appropriate for designations which made them the focus for development within their sub regional area. Similarly, such designations may assist in supporting the direction of physical and social infrastructure investment in these locations, which will be required to achieve such a balance.

- 29. Should any further sub-regions be included in RPG14, either in place of or in addition to those identified above? Do the 'economic arcs' merit inclusion in RPG14?**

The effectiveness and clarity of RPG14 will not be well served by identification of many sub regions. For example it will be confusing if areas identified on an economic basis (such as in EEDA's recent study dated July 2002) overlap with areas identified to meet other planning objectives - such as the suggested sub-regions in the Regional Housing Statement (page 70 of the consultation document), together with other areas which have been identified as Sub Regions for spatial planning purposes ( such as London – Stansted – Cambridge)

As outlined in response to Question 31, HCC is in any event concerned about the economic sub regions which are set out in the Consultation Document. It is HCC's view that the economic arcs defined through the Bone Wells Study better reflect the economic interrelationships in the Region

## **Chapter 8: Economic Development**

***Q 30 Are there any specific policies or issues concerning the economy you consider must be included or discussed in RPG14 ?***

Yes, the overriding issue should be that economic development should be undertaken in a sustainable form. The Region's economy should mirror Hertfordshire's in that the push should be towards an economic future that is knowledge based and environmentally sensitive. The future prosperity of the region is dependent upon furthering the economy while preserving quality of life.

London is by far the most significant driver on the economy of Hertfordshire, not Cambridge. 25% of Hertfordshire's workforce are employed in London. The GDP of our residents is significantly higher than GDP of our workforce due to the London effect. The Bone Wells study produced for EEDA confirms this picture.

Manufacturing Productivity is high in Hertfordshire and above the region's average. The Hertfordshire Local Economy Assessment 2002 produced by BSL Ltd for the Hertfordshire Prosperity Forum demonstrates this fact.

Strategic Employment sites where development is encouraged could be identified in the region but these should be in the most sustainable locations and developed in the most sustainable way possible.

It must also be stressed that in the Hertfordshire context, the issue of the provision of sufficient affordable housing is a critical issue in terms of safeguarding future prosperity and economic growth. This is an issue which is already placing many sectors of the economy in the County under stress in terms of recruiting and retaining an effective workforce. Unless it is adequately addressed it will certainly have a serious impact on the economy of a number of areas in the Region.

### ***31. How could support for business clusters be best achieved by RPG?***

HCC would support the nine priority sectors that have been identified in the draft RPG 14. We would also support the various "emerging" and "maturing" clusters that have been identified.

HCC did have concerns with the research that was undertaken by EEDA on Clusters and sub regions owing to very little consultation with the sub regional economic partnerships.

It is important that the advanced engineering cluster recognises the importance of defence and aerospace in Hertfordshire, as illustrated by global companies such as MBDA and Astrium Space. This was overlooked in the SQW research.

Clusters need to be given the space to grow and a link should be made to any strategic employment sites above. There are pan-regional issues, in Hertfordshire's case the Structure Plan and RPG14 needs to reflect the "Technopole" type influences of London and Cambridge. For example in the case of Hertfordshire's film cluster the

influences of the film sector and clusters in both London and Buckinghamshire are all part of the same cluster as Hertfordshire's. Similarly the bio-science cluster around Cambridge extends into Hertfordshire through Royston to Stevenage (Glaxo Smith Kline's research campus) as does the bio-science cluster of North London extend into SW Herts.

The "arcs" suggested in the sub-regional Bone Wells study better reflect the economic regions than those suggested within the RPG options document which in our view are artificial. This document seems to have been avoided in the draft RPG14.

*The "arcs" are far more important to Hertfordshire than the sub- regions of the M11/A1 and the West Herts areas that were identified in the EEDA /SQW report, which HCC does not recognise and which in its view has no justification. The ripple effect emanating from London, which affects the whole of the county, is by far the most dominant sub regional influence on Hertfordshire.*

**32. Should Priority Areas for Regeneration be defined by reference to all factors ( i.e. social, environmental etc) or only economic ones?**

Priority areas should reflect all three themes. This would reflect our own five year Economic Development Strategy 2000-2005. The challenge for the region should be to build prosperity, combat poverty and build stronger communities in a socially, economically and environmentally sustainable manner. This reflects Government advice and should assist Community Planning and the production of Community Strategies.

We in particular support the Priority Area for Economic Regeneration as it effects the Lee Valley. [This was an issue where HCC successfully lobbied SERPLAN to extend the PAER into Hertfordshire as part of RPG9]. Two of Hertfordshire's Key Employment Sites are located in Broxbourne.

**33. How should RPG 14 address economic development needs in rural areas, villages or smaller market towns?**

RPG should encourage new business development and start ups in rural areas and policies should enable farms to diversify where appropriate. Re-use of rural buildings should be encouraged where appropriate.

There should be a balance between the built and natural environment. Reference should be made to the Rural White Paper. Although not significant in terms of GVA, whole communities remain rural with poor access to services. The links between settlements are therefore crucial.

The successful East Hertfordshire European AGRE project could provide some concrete examples of good practice.

In overall terms there is a need for the RPG to better address rural issues and provide an adequate strategic planning framework for the rural areas of the Region. Given the importance of the rural areas in terms of the land area of the Region, RPG will need to be far more balanced in terms of its policy content, than is currently indicated by the Options Consultation Document.

**34. Do you agree that defining sub-regions could assist RPG14 in: guiding housing development to the correct broad locations; enabling housing supply to be monitored and managed in line with changing conditions? If not, what alternative approach would you recommend, and why?**

HCC agrees with EELGC's initial view (para 9.5 of consultation document) that the most appropriate approach is to require county and unitary councils to work with districts to define sub-regions. However, HCC considers that neither the areas suggested in the Regional Housing Statement (Figure 11 in consultation document) nor the type of economic sub-regions as suggested in the East of England Economic Planning Sub-Regions Study (Figure 10) represent logical and durable sub-regional divisions for the purpose of planning and managing housing supply. The fact that EEDA and the Housing Corporation have put forward such differing understandings of sub-regional geography underlines the difficulty in trying to reach any lasting consensus on this matter.

HCC recommends that, pending reorganisation of the planning system, RPG14 should use existing strategic planning areas for the purpose of sub-regional housing distribution, i.e. structure plan areas as in existing RPG6/9. It will still be possible for RPG14 to indicate approximately the contribution that specific growth areas should make to dwelling provision in each of the counties.

It is to be hoped that the forthcoming legislation to modernise the planning system will clarify what will be most appropriate sub-regional planning arrangements to apportion county level figures in RPG14 between district and unitary areas.

Realistically, any move to making the housing distribution on the basis of a complete coverage of differently defined sub-regions will need to await the first review of RPG14.

**35. Do you agree with the suggestions for increasing the proportion of development coming forward on previously developed land? If not, what targets do you suggest and how could they be achieved?**

Paragraph 9.11 of the consultation document puts forward draft targets for how much housing can be provided on previously developed land, as follows:

Luton, Essex/Southend/Thurrock, Hertfordshire and Peterborough – 70%  
Bedfordshire, Cambridgeshire, Norfolk and Suffolk – 55%

What will be realistic in percentage terms will depend on the scale of overall housing provision to be planned and its sub-regional distribution. Consequently it will be necessary to decide on these matters before percentage targets for development on previously developed land can be set. If, as HCC recommends, the overall requirement is set no higher than the level in existing RPG6/9 (question 9) and if the

distribution reflects HCC's recommendations in response to question 19, then the percentage targets at paragraph 9.11 of the consultation document seem reasonable.

However, if development scenario 3 were to be pursued, then the much higher housing numbers in Hertfordshire would mean that the percentage target would need to be set much lower than 70% - probably comparable to the suggested 55% for most other parts of the region.

***36. What should RPG14 do to foster the achievement of higher targets, for example on design, density and re-use of land / buildings (bearing in mind that RPG must focus on strategic issues and not try to dictate detailed, local implementation)?***

#### *Design*

Housing design is not a matter that can usefully be addressed in RPG.

#### *Development density*

Likewise RPG is not the appropriate vehicle for indicating how higher densities can be achieved without compromising on quality of housing. However it will be appropriate to set a target average development density for the region as a whole and to monitor this closely. To set differing targets depending on the accessibility and other characteristics of sites may be overly complex to monitor in practice, but warrants further study.

The Deputy Prime Minister indicated in his statement on 31 October that he intends to take steps to ensure that future housing developments in the South East (which presumably includes the East of England) will be at over 30 homes per hectare. However this average is already being exceeded in Hertfordshire. HCC recommends that the target to be set in RPG14 should be much more challenging, say an average density of at least 40 dwellings per hectare. However, it should be acknowledged that residential density does need to be appropriate to the surroundings of a particular development, rather than simply being a blanket target. Monitoring over a period of years would then indicate to what extent the target is being achieved in different parts of the region, the reasons for differences and what aspects of good practice in design in some areas might be practised more widely.

#### *Use of previously developed land*

RPG14 can only indirectly influence the proportion of homes provided on previously developed land, including conversion of existing buildings. However that indirect influence is important – through adopting a spatial strategy that focuses primarily on supporting regeneration in existing urban areas across the region. For the reasons outlined in response to question 19, it will be particularly important to prioritise infrastructure investment to support regeneration in the PAERs and Thames Gateway,

where so much of the potential on previously developed has proved much more difficult to realise to date.

***37. What targets should RPG14 set for affordable housing provision? Would the definition of sub-areas assist provision? If so, what sub-areas should be used and what should the targets be?***

HCC is concerned that the issue of affordable housing appears to be given insufficient importance as an issue in the Consultation Document. Affordability is a critical issue affecting the economy of the Region in high growth areas such as Hertfordshire. It must also be acknowledged that the Arc Around London suffers particular problems generated by high house prices driven by the demands of London commuters. In short, the suggested minimum targets appear to be unambitious and will be unhelpful in supporting Local Planning Authorities pursuing policies to meet their local needs.

A region-wide target appears contrary to Government policy in revised PPG3, which states at paragraph 12 that:

*‘Estimates for affordable housing set out in RPG should be regarded as indicative and should not be presented as targets or quotas for local planning authorities to achieve....’*

However HCC does not agree with that aspect of current Government policy and hopes that this will change when a new ‘Planning Policy Statement’ on housing is issued. It supports the EELGC’s initial view (paragraph 9.21 of consultation document) that a region wide target should be set for development of affordable housing, and that local targets should be justified by local housing needs studies. Such studies are the responsibility of district and unitary councils in their capacity as local housing and planning authorities. Consequently it is difficult to envisage any practicable sub-areas for which to set targets other than groupings of adjacent districts and/or unitaries, by agreement of the councils involved and on the basis of using similar methodologies to assess needs.

It will be important to frame the overall target and any sub-regional targets in such a way as to be readily monitored. For this and other reasons HCC recommends that different targets are set for different categories of affordable and key worker housing. Some categories are likely to prove easier to monitor than others. The EELGC and the Housing Corporation will need to liaise on how categories should be defined.

## Chapter 10: Transport

### ***Q.38 Do you think that the emphasis should be more on Transport option A or option B?***

The base position is in accordance with HCC's own transport strategies.

Option A raises concerns about the development of new transport links and fostering development in areas that would be inappropriate. However, the element which provides for improved east-west links in the north of the region will have benefits for Hertfordshire by removing through traffic on congested road and rail links.

Option B creates a shift in emphasis to urban areas to the detriment of rural areas. Whilst the further shift of transport sources from the strategic to the local is supported, the policy towards the management of road networks, especially in urban areas, could lead to problems where it is difficult to provide alternative means of transport.

### ***Do you consider this relevant in all parts of the region?***

The emphasis on developing alternatives to the car are more important in the heavily congested south of the region, and the Option A element of improving the reliability and capacity of rail links to London are also more important in the south where the links with London are much stronger.

And for all the spatial options?

No comment

### **Q 39 Do you agree with these transport objectives?**

The transport objectives generally accord with the County Council's transport objectives as set out in the Local Transport Plan.

### ***Q 40 Do you consider that the road and rail networks adequately identify links of national and regional significance? If not, what changes would you wish to see – and why?***

There is concern that the road hierarchy does not reflect either the Trans European Network or the existing Primary Route Network. It is identified that Categories A-C should carry any significant movements by heavy vehicles, but there are parts of Hertfordshire's Primary Route Network (PRN, to which HGVs are directed) which are not included within these categories.

The definition of the A1 as a regional rather than a national link could have implications for the priority for improvement works to address the severe congestion problems.

Roads which are on HCC's PRN but are not included in the regional road hierarchy are:

- A602 Ware to Stevenage

Roads which are included on the regional road hierarchy but are not included on HCC's PRN are:

- A505 Baldock to Luton
- A1081 St Albans to Luton

The regional rail hierarchy generally seems appropriate it that it identifies all of the main lines in Hertfordshire as strategic national links. However, the Metropolitan line to Watford is not shown at all, which is contrary to the County Council's position of promoting the Croxley Rail Link.

***What parts of the network require significant investment to enable them to fulfil their role in the hierarchy?***

At Q 19 we stress need to prioritise infrastructure investment to support PAERs and larger centres

***Q.41 should key regional transport nodes (e.g. Bedford, Cambridge, Luton, Stansted, Stevenage, Thames Gateway and Watford) be the focus for improved network and interchange possibilities?***

Assuming that the transport nodes across the region are appropriate (and Hertfordshire supports the identification of Watford and Stevenage as the two principal nodes for the county), it is appropriate that these nodes are the focus for transport improvements. This also applies to links from outside the region (e.g. Croxley Rail Link and Crossrail in the case of Watford).

However, the nodes should not be used to justify new links which will have significant adverse environmental impacts. For example, the classification of Stevenage as a regional node could lead to pressure for a new link from the east.

***Q. 42 What type of management should take place on the strategic rail and road networks? Where should this be concentrated?***

The management focus should be on the non-strategic network to prevent adverse environmental impact on local communities, and to help ensure that through and HGV traffic is concentrated on the strategic network.

Measures such as bus and high occupancy vehicle lanes may be appropriate on strategic roads, but any such facilities should come from new provision rather than by re-allocating existing road space.

***Q. 43 Should RPG14 set maximum levels of parking provision for non-residential developments lower than those set out in PPG13 where there is (or could be) good public transport accessibility levels (e.g. in town centres)? If so, do you think 70% of the maximum level would be appropriate?***

The maximum levels should be those set out in PPG13. There will be certain circumstances, such as locations where there is high passenger transport accessibility, where it will be appropriate to have lower standards. The procedures for determining the parking standards which accord with any given set of circumstances should be set at local authority level.

***Q. 44 Under what circumstances could workplace parking charges and/or congestion charging be introduced in the region's main urban areas?***

The introduction of either charging method could have significant impacts for the displacement of traffic, particularly in the south of the region where there is a much denser pattern of settlements. The implications of the London congestion charging scheme should be carefully studied before any decisions are made on the suitability of charging in the East of England. See also reference to congestion charging in response to Q15

***Q. 45 Are there any areas where there is a particular need for improvement in the provision of strategic rail and/or bus/coach services?***

The County Council's Rail Prospectus identifies the need for improvement on all rail lines in Hertfordshire. The County Council supports the following projects which will have significant benefits for rail services in the County:

- Thameslink 2000
- Croxley Rail Link
- East West Rail Project
- Channel Tunnel Rail Link
- CrossRail
- Airtrack
- West Coast Route Modernisation
- East Coast Route Upgrade
- West Anglia Route Modernisation

In general there is a need to provide additional capacity on services in the south of the region to meet the Ten Year Plan overcrowding targets as well as the anticipated growth.

There is a need to improve strategic coach links in the county, but there is no detail at present on how this could be achieved.

***Q.46 Should the RTS identify where local public transport investment should be targeted? If so, how should it be targeted? To achieve modal shift? To guarantee a minimum service provision where commercial services are not viable?***

The conditions for local public transport will vary considerably across the region, and therefore it is more appropriate that decisions for investment are made at individual authority level.

***Q. 47 Do you consider that the identification of public transport nodes as locations for regional or sub-regional development is a helpful approach?***

The identification of transport nodes should be one of many factors in determining whether a location is suitable for regional or sub-regional development. However, strategic scale development should not be channelled to such locations merely because they are a defined node; other planning considerations such as the Green Belt will also be important.

***Q.48 What rail and road freight improvements do you consider are required? Where should strategic freight interchange be encouraged?***

For rail in particular, the requirement is to provide freight routes which remove the need to travel via North London for e.g. transit from the Haven ports to the Midlands. This would provide for further passenger capacity on the congested railways in the south of the region. The County Council therefore supports the proposed improvements to the Felixstowe – Nuneaton freight route.

***Q. 49 How far should environmental, safety, social inclusion and quality of life impacts of strategic transport policy proposals determine whether and how proposals are implemented?***

The County Council accords the highest priority to transport safety, but the other factors should also be important in taking transport decisions. However, the economic and transport factors must not be regulated to secondary considerations. It will be impossible to have a definitive statement on the weight of each factor as each proposals will need to be considered on the local circumstances.

***Q50. Do you consider that the proposed targets adequately reflect the transport objectives?***

Objective (h) to improve safety and security is only covered by a contextual indicator without a target. This does not adequately reflect the importance of improving road safety (or indeed for other modes of transport).

The “reducing the need to travel” element of objective (b) is not covered by the indicators – these concentrate on the access element. A target relating to average journey length would be more appropriate.

## Chapter 11: Environment

### ***51. How should RPG14 set guidance for Flood Risk Assessment at a strategic level?***

At present the environment agency is developing and promoting the use of strategic flood risk assessment as part of its input to the development plan process. It is the County Councils view that the use of this approach should be incorporated into the final guidance presented in RPG14.

In addition the findings of the current research being undertaken by the Regional Sustainability Round Table on the impacts of climate change on the East of England should be incorporated into any policy dealing with management of flood risk.

### ***52. How should regional policy encourage greater energy efficiency? How best should regional policy encourage the achievement of renewable energy generation targets? Should RPG14 set county-levels for renewable energy, or should they be set on some other basis (e.g. regional, sub-regional)? Should RPG14 include policies for non-renewable energy generating capacity and energy distribution networks? If so, what approach should be taken?***

Energy efficiency is quite rightly a matter that should be dealt with in supporting sustainable development and given that the overall aims and objectives of RPG14 as set out in the consultation document purport to follow support this, then some reflection of the need to promote greater energy efficiency needs to be incorporated into RPG14. However, much of the opportunity to improve energy efficiency comes about as a result of development. As such it is the County Councils view that the emphasis on encouraging energy efficiency should be incorporated into an overarching policy which sets out the main sustainability principles for new development within the region.

At present the adopted County Structure Plan for Hertfordshire contains support for renewable energy generation in general terms. However such general support is not sufficient to prompt this sort of development coming forward. It is the County Councils view that a more pro-active approach to bring forward renewable energy development needs to take place and that it is appropriate for this to be reflected in the final policy guidance provided within RPG14.

If renewable energy targets are to be met then these need to be established at the closest level to that where the decision on this sort of development needs to be made. With this in mind HCC would support RPG14 setting county targets for renewable energy generation and would ask that any final policy encourages the translation of these targets down to the District Level.

If as a result of the deliberations of the various task groups working on the development of RPG14 the need for non-renewable energy generation facilities is identified and they are of a size that has regional significance then it is right this need should be identified. It is also appropriate that the principles guiding this form of

development should be set out and included in policy guidance. However, it would be inappropriate to pre-judge the results of any local debate on the more detailed element of planning policy associated with this form of development.

***53. What are the most important coastal management issues to be resolved and what are the key elements of a vision for the future planning of the Region's coast to be incorporated in RPG?***

HCC does not have a view on this issue.

***54. All elements of the built and archaeological heritage are important, but which are particularly significant to the region and how can RPG ensure that they are conserved and enhanced?***

HCC recommends that the terminology in relation to the 'built environment and archaeology' should be clarified - Government guidance promotes the use of the term 'historic environment'. The use of characterisation to identify those elements of the historic environment of greatest importance should be promoted through the policies in the RPG.

***55. Do you agree with the policy approaches suggested above for the management of land, air and water quality? If not, what policies should be pursued? Are there other issues that RPG should address?***

HCC recommends that the following in relation to the management of land air and water quality:

- RPG14 should promote through its policies 'Visual Impact Assessment' - as a tool for assessing the impact of development proposals.
- RPG14 should provide appropriate policy protection and recognition of protected landscapes (e.g. Areas of Outstanding Natural Beauty and The Broads). Not only should they be protected from inappropriate development and considered as part of the assessment of the spatial scenarios, they should also be promoted as focuses for economic development and rural revival.
- RPG14 must afford proper protection to locally important, non-statutory nature conservation designations - we support any policy developments in this area.
- RPG14 should deal with air quality issues as part of its approach to the sources of this pollution e.g.: transport and development rather than as an issue in its own right. Principles aimed at minimising the impact of transport and development on air quality should be incorporated into a policy setting out the overarching principles for the sustainable development of the region as a whole.
- In relation to the management of water quality and water resources careful consideration needs to be given to the spatial implications arising out of the availability of water resources across the region. Over abstraction of water

resources in particular localities may lead to significant quality problems and where possible the final spatial strategy for the region should seek to avoid the over development of areas where this may become an issue.

## Chapter 12: Culture

### ***56. What weight should RPG14 give to culture as a component of regional planning policies?***

The cultural sector plays an important role in people's lives. RPG14 should therefore give considerable weight to the planning implications of the Regional Cultural Strategy and individual County Cultural Strategies (such as 'Enjoy!' in the case of Hertfordshire). It is important that facilities provision keeps pace with development and that adequate sites are reserved to meet the needs of cultural activities. RPG should explicitly recognise the value that all culture brings economically to the Region.

### ***57. How should RPG14 address existing deficiencies in cultural provision, and the need to ensure proper co-ordination of community and cultural provision in association with new development?***

HCC would support that whether we are undertaking regeneration schemes or new build developments, creative and imaginative design is essential if we are to gain maximum cultural benefit from buildings and their settings and from open and landscaped places. We must seek to maximise planning gain from proposed new developments.

HCC supports the view that areas for cultural facilities should be considered in planning developments. The development of cultural centres should be encouraged as an integral part of major developments.

### ***58. Should RPG14 make any specific strategic proposals? If so, which proposals justify inclusion in the RPG and why?***

At this stage there do not appear to be any proposals of strategic importance in Hertfordshire that would warrant identification in RPG.

## Chapter 13: Minerals

**59. Is the present approach to re-use and recycling of aggregates sufficient? Could further measures be taken to increase the supply from this source, particularly in the context of measures to increase the re-use of previously used land?**

The draft policies relating to minerals for inclusion in the new RPG14 do offer a sound basis to developing further the re-use and recycling of aggregates. In parallel to the preparation of this RPG, there is an expectation of much lower supply guidance from the Office of the Deputy Prime Minister concerning aggregates including sand and gravel. Should this revised supply guidance more closely reflect present levels of supply, it will become a key policy driver to help ensure that any increase in demand, in future years, is met by alternatives to land won minerals.

This strategic approach has been carried forward into the First Deposit Draft of the Hertfordshire Minerals Local Plan Review September 2002. The proposed policies for RPG14 chapter 13 on Minerals will provide a sound framework to support the policies of the Mineral Local Plan, both as it progresses through its preparation and subsequently when used for development control purposes.

## Chapter 14: Waste

***60. How should RPG14 incorporate the principles of the Regional Waste Management Strategy (RWMS)? How can we ensure that new facilities can be developed in the right locations without adverse impact on new or existing development, and without inhibiting the region's ability to ensure proper, sustainable treatment of waste? Are there any conflicts with other aspects of regional strategy? If so, how can they be resolved?***

The purpose of the Regional Waste Management Strategy is to give guidance on the land use planning aspects of waste management. It does this by considering the regions needs for waste disposal, by all methods, and then considering the provision of sufficient facilities to accommodate this waste disposal need. A role of Waste Local Plans, prepared by the County Councils within the Region, is to translate these strategies into more detailed frameworks for the planning control of waste disposal related development.

The Eastern Region Waste management Strategy has a number of key principles that will impact upon land use planning for each County in the region. Importantly, the Strategy envisages that counties should make provision in their Waste Plans for self sufficiency for their county area as the starting point. In other words, local planning authorities should plan for facilities to enable all waste streams for all arisings of that county to be dealt within the county boundary. However in circumstances where there is a clear mutual benefit for shared facilities, boundaries should not prevent good practice. Indeed for some special waste streams, regional facilities may be the only practical option

However, to secure the alternatives to landfill, it is vital for new businesses to establish and become viable in the longer term. Although securing the development of new and expanding waste businesses will involve developing a mature market for recycled waste (which can be influenced by collection practices of collection authorities and businesses), the Waste Strategy advises that Waste Local Plans should ensure that sites are identified for these new waste sites. This will reduce the planning hurdles, contributing to a pro-active approach to securing the development of waste related businesses.

However this goal is the major challenge facing land use planning for waste. Waste handling, including final disposal, has always been perceived as a 'bad neighbour' activity and finding suitable sites with willing land owners is very difficult.

This is clearly recognised in the question posed in the draft RPG14, which questions how we can ensure that new facilities are developed in the right locations without adverse impact on new or existing development.

HCC's current waste local Plan identified many sites for waste facilities. However a good proportion of these have not come forward for waste disposal/handling/reduction facilities. The Waste Local Plan is the final stage in developing the policy framework for securing the delivery of land for waste facilities. A key issue will be to evaluate why some sites have not come forward and will form an important part of the initial stages in reviewing the Adopted Waste Local Plan.

Over time, as higher level policy drivers, such as EU and then UK government strategies bring greater and greater pressure, these will bring more impetus to bringing about the supply of land. As presently drafted both the draft Regional Waste Management Strategy and the draft RPG14 will provide a sound framework for land use planning at the Waste Local Plan level. It is important therefore for the RPG to adopt the Waste Management Strategy as a key instrument of justification for the land use strategies and policies it