

**STRUCTURE PLAN AND
REGIONAL PLANNING ISSUES PANEL
Wednesday 7 July 2004**

Item No.

7

Members of Panel: M Bayes, R Clements (Sub), A Dodd, D Drake, J Metcalf (Sub), M Saunders, R J Smith, I Simpson, W Storey (Chairman), B A York.

UK Sustainable Development (SD) Strategy Review

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1. Purpose of Report

- 1.1 To inform Members of the UK-wide consultation seeking stakeholders' views on what should be included in the new Sustainable Development (SD) Strategy for the UK, to be produced by 2005, and to seek members' comments on our draft response to the regional consultation to inform our response to the national consultation.

2. Background

National Consultation

- 2.1 The deadline for the national consultation is 31st July 2004.
- 2.2 The consultation is explained as part of a programme to build a UK Strategic Framework for SD to 2020 which aims to provide a consistent approach to SD across the UK.
- 2.3 It is framed as a five year update of the Government's existing SD strategy 'A Better Quality of Life (1999)' but is also prompted by the recent reviews on elements of local SD raised in the Egan report and the Joseph Rowntree Foundation's report, 'Seeing the bigger picture - delivering local sustainable development'.
- 2.4 The UK consultation seeks the views of local authorities in their role as community leaders with a particular emphasis on the duty to prepare a Community Strategy and our role in the delivery of community well-being.
- 2.5 The questions directed specifically at Local Authorities are:

How can we re-energise local delivery and strengthen local leadership for sustainable development?

How could local stakeholders make the most of existing partnership arrangements, strategy requirements, freedoms and flexibilities to improve delivery of sustainable development?

What can be done to build the capacity of local professionals and local communities to deliver sustainable development?

What are the strengths and weaknesses of the current sustainable development indicators themselves and how they are used?

2.6 The consultation pack for HCC includes:

- National Consultation Document
- Local Authority Dialogue Paper (which we are encouraged to use with members and officers)
- Dialogue pack for LSPs including 'toolkit' for engaging the community in issues around SD and the consultation.

2.7 The Local Authority Dialogue Paper explores the issues which affect and are influenced by local authorities. Questions invite feedback on the following areas: local leadership; CPA and audit regimes' the language of SD; how best to evaluate and reward local delivery of SD; tools available to help local authorities deliver SD such as Local Public Service Agreements; sustainability appraisal; reporting mechanisms; training, and funding needed for local delivery of SD.

2.8 An officer/member response is being prepared based on wide consultation with officers, which will then go through the Executive Members for Environment and Partnerships for comment. The consultation will include dialogue with Community Strategy Officers to ascertain what help is needed to integrate SD into Community Strategies. (We are currently engaged in Sustainability Appraisal for the Herts Together strategy as our method of integrating SD).

Regional Consultation

2.9 Regionally, a partnership including Go-East, EERA, EEDA, the East of England Sustainable Development Round Table and the UK Sustainable Development Commission is organising a debate outlining how the proposed national priorities affect the region. Their written consultation ends on 1st July, and the debate takes place on 29th July. John Rumble will be attending from the Forward Planning Unit.

2.10 The national priorities are set out as:

- Climate change and energy
- Sustainable consumption, production and use of natural resources
- Environment and social justice
- Helping communities to help themselves

- 2.11 Under each of the national priority headings, the paper outlines some of the challenges facing the region, including how to manage an extra 500,000 new homes by 2021, how to reconcile economic growth with reduced waste and sustainable use of resources, how to tackle inequalities in health and communities.
- 2.12 Having introduced these topics, the consultation paper then backs off from specific topics to a much broader agenda. It instead asks for feedback on whether the national priorities are the right ones for sustainable development, whether they apply to our region, who should be delivering them and what more government can do to help deliver SD in the region.
- 2.13 The deadline for the regional element of the consultation is 1st July although there will be an opportunity to raise issues at the debate on 29th July. This draft response will also inform our wider response to the national consultation.
- 2.14 The panel is requested to respond to the issues raised in this section of the paper with regard to whether there are any omissions which need to be raised at the 29th July event, and whether the content is appropriate to inform our response to the national consultation.

3. Summary Response to East of England Consultation Questionnaire

- 3.1 We make a general point that it is a pointless task to try and prioritise the national 'priorities' as they are too broad and cross-cutting and are not informed by any sub headings to explain what they cover.
- 3.2 We suggest that sustainable development needs to be looked at through a systematic inclusion of all the pertinent issues, social, economic and environmental.
- 3.3 In response to the poor layout of the strategy consultation and the looseness of the consultation approach, our response suggests an overall framework for the strategy which includes the need to:
- set out specific objectives and priorities for each of the topics.
 - set out and justify the national/regional and local delivery mechanisms that exist within each of the topics – legal, fiscal, policy, and so on.
 - set out clear roles and responsibilities that exist within each topic area.
 - explore whether current delivery mechanisms and roles and responsibilities are satisfactory, whether there any gaps or issues, along with how these should be addressed.
 - if necessary, identify clearly justified priority areas, explaining how in particular these will be tackled.
 - set out a clear list of actions, if necessary within topic-based sub-strategies, upon which consultation is also undertaken.

- review monitoring arrangements and how monitoring should be used to review the Strategy itself.
- consider the role and status of a nationwide package of Regional Sustainability Strategies.

3.4 Our response also sets out the major issues for the region, which are not addressed within the SD strategy papers. (Points **i** to **vii** are taken from our draft response paper).

i. Economic Development

A demand/growth led approach to economic development remains a key theme of national and regional policy. GDP is consistently used as the main measure of economic development. The RES for the East of England is based on a target of being within the top 20 wealthiest European Regions by 2010 (based on GDP). There is very little by way of evidence of alternative mechanisms of achieving sustainable economic development or the sustainability implications of adopting the target-driven approach. The emerging RSS14 simply takes the RES target approach as being the right thing to do – it appears not to be challenging it, testing its sustainability credentials or undertaking a sustainability appraisal of possible alternatives.

The UK SD strategy needs to revisit the country’s approach to economic development, and put in place appropriate delivery mechanisms to ensure that sustainability is put at the heart of economic development, and appropriate ways need to be found to measure economic prosperity. This will be of particular importance to the future of the RDAs.

ii. Climate Change

In the light of the regional work ‘Living with Climate Change in the East of England’ which has just been completed (with HCC as project manager) to look at adaptation for climate change in the region, this section should be informed by some real objectives and timescales.

iii. Infrastructure Provision and Services

Roads, public transport, health, education - These infrastructure and service shortfalls will only be exacerbated if the Region is to accommodate significant additional development over the coming two decades, exacerbated by the Government’s Growth Area proposals as set out in the Sustainable Communities Plan (see below).

iv. Planning for the Region’s development needs

The East of England will need to accommodate a significant amount of development over the coming decades. This raises a range of key sustainability challenges which need to be taken forward through the

preparation of RPG/RSS for the East of England. The Strategy should play an important role in addressing concerns expressed throughout the country and in the East of England about the scale, distribution and form of development.

Scale of development

A key challenge facing the East of England Region is to ensure that decisions about the correct overall scale of development – whether this be housing, business, minerals extraction, waste disposal, airport growth, and so on - that should be planned for, are taken on robust technical information and with the integration of sustainability principles. The County Council has very major concerns relating to how this is being conducted through the preparation of RPG/RSS14.

In the case of meeting housing needs, for example, the County Council is concerned that the approach being adopted is more akin to predict and provide than it is to plan, monitor, manage. Indeed, for proportions of the growth being considered (e.g. in the Sustainable Communities Plan Growth areas – see below), it is not known how housing figures for parts of the region have been arrived at. This is totally unacceptable, particularly given the massive scale of greenfield and Green Belt land that will be lost to accommodate such development.

In the case of economic development, the emerging RPG/RSS14 should be based on an assessment of a range of options on how the Region's economic development can best be achieved to further the aims of sustainability, not on the basis of the growth at all costs approach taken in the RES.

A sustainability appraisal and/or strategic environmental assessment process is required to consider the implications of different overall scales of growth.

Spread of development

A further challenge in meeting development needs is to ensure that having come to a view on the appropriate scale of development, that the spread of that development is achieved that best meets the needs of the whole region. The County Council is concerned that the emerging RPG/RSS14 has not properly considered the sustainability advantages and disadvantages of different options for distributing development across the region. For example, by considering options which divert development pressure away from overheating parts of the region with significant environmental and infrastructure constraints and overall economic buoyancy, to other areas where development pressures and constraints are not such an issue and which are less buoyant economically and are in need of regeneration.

In relation to the London-Stansted-Cambridge-Peterborough Growth Areas which affects Hertfordshire, the County Council is not only concerned about the lack of justification for the overall scale of growth proposed, but also the disappointing lack of consideration of robust options for different distributions of development. There is no overall strategy for the Growth Area within which decisions about distribution of development can be taken.

The options for the distribution of development for the region as a whole and for the Growth Areas within it should be informed by robust technical work and informed by sustainability appraisal and/or strategic environmental assessment techniques. Both of these are currently lacking.

Sustainable Communities Plan - Growth Areas

Given the wide range and scale of the Government's proposals for the Growth Areas within the Sustainable Communities Plan and the lack of public consultation involved in this crucial piece of Government policy, in the case of the London-Stansted-Cambridge-Peterborough Growth Area there has not been a satisfactory explanation of:

- why and how the scale of development proposed is sustainable – the technical justification needs to be transparent
- the justification for their geographic extent of the Growth Area
- how growth proposals fit within an overall strategy for the Growth Area based on sustainability principles which ensure that the scale and distribution of development is in the best interests of the needs of the Growth Area.

Making the development that does take place more sustainable

A further key challenge will be to ensure that the development that does take place is undertaken in as sustainable a manner as possible – by integration of sustainability principles into all aspects of development, from design and architecture, through to materials procurement, construction and in future use. Unless this is seen as a priority, whatever the sustainability credentials of the scale and distribution of development, development will continue to be unsustainable.

Community involvement and participation

The County Council is closely involved in the technical work being undertaken and the processes followed in the preparation of RPG/RSS14 for the East of England. This process will set the agenda for development for up to the next 20 years and beyond. However, the County Council has very real concerns that some of the process underway have negligible public consultation. Whilst this may be one of the consequences of the changing planning regime resulting from

the Planning and Compulsory Purchase Bill, the lack of transparency is not consistent with sustainability principles.

v. Urban and Rural Renaissance

A key challenge for the region is to raise the quality of the region's built environment, both urban and rural, across the board. The use of design and good planning is key to allowing people to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion. Organisations and agencies, along with local communities have a key role to play in the urban and rural renaissance agenda in social, economic and environmental terms. It is vital that the roles and responsibilities of these organisations are clarified and the funding mechanisms and skills required are identified to ensure that urban and rural renaissance objectives are delivered on the ground.

A key challenge is to ensure that the growth aspirations for the region deliver a sustainable pattern of development throughout the eastern region and that the coalescence of existing built up areas does not occur. The design, planning and full integration of new development with the existing urban and rural fabric will be fundamental to the success of the region's growth strategy in sustainability terms. Quality of life within existing urban and rural communities should not be compromised and nor should the regeneration priorities of any one area.

On the issue of regeneration priorities, the key challenge is to ensure that the identification of green field sites does not hamper the delivery of homes on previously developed land in urban areas. Green field sites are inherently easier for the development industry to bring forward than previously developed land. If this occurs this will inevitably undermine attempts to regenerate existing built up urban and rural areas and their renaissance aspirations.

vii. Housing Affordability

The East of England Affordable Housing Study identifies housing affordability as being a key issue throughout the region. Hertfordshire was one of three counties identified as being in greatest need for additional affordable housing. The Study identifies 15 house price 'hot spots' in the region, 9 of which are Hertfordshire districts (all Hertfordshire districts except Stevenage Borough). The variety of mechanisms required to resolve housing affordability issues and the role of various agencies need to be considered through a consultation on a revised consultation exercise along the lines of the overall framework proposed above.

4. Conclusions

4.1 We are generally critical of the lack of substance in both the national and regional consultations and the lack of defined process for putting together the new UK SD Strategy.

4.2 Additional comments in our response to the national consultation concern:

- Lack of consultation with local authorities on key government strategies central to SD – e.g. Sustainable Communities Plan
- Overly UK-centric approach – sustainable development cannot be considered without a global view
- UK national approaches conflict with regional sustainable development objectives – an anomaly exists between government policy and the need to deliver ‘sustainable communities’ locally.
- Communication and education elements of SD are not raised in the consultation.

4.3 The panel is requested to consider the content of our response outlined in this paper and confirm whether this is considered an appropriate response for the national consultation and whether any additions or changes are needed for the wider consultation.

5. Publications referred to in this paper.

A better quality of life: a strategy for sustainable development for the UK, 1999
http://www.sustainable-development.gov.uk/uk_strategy/content.htm

The Egan Review: “Skills for Sustainable Communities”, 2004.
http://www.odpm.gov.uk/stellent/groups/odpm_urbanpolicy/documents/page/odpm_urbpol_028549.hcsp

The Joseph Rowntree Foundation: Seeing the bigger picture ‘Delivering local sustainable development’, 2004.
<http://www.jrf.org.uk/bookshop/eBooks/1859351581.pdf>

‘Taking it on’ National Consultation on developing a new UK Sustainable Development Strategy
<http://www.sustainable-development.gov.uk/taking-it-on/index.htm>

‘Taking it on’ – Regional Dialogue Paper and questionnaire.
http://www.go-east.gov.uk/About_Us/Business_Groups/Environment/SDAT