

**STRUCTURE PLAN AND
REGIONAL PLANNING ISSUES PANEL
MONDAY 22nd NOVEMBER 2004**

Item No.

5

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.

**SUB REGIONAL PLANNING: MILTON KEYNES AND SOUTH
MIDLANDS SUB-REGIONAL STRATEGY, SECRETARY OF STATE'S
PROPOSED CHANGES**

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1. Purpose of Report

- 1.1 To seek the Panel's views on the Secretary of State's (SoS's) 'Proposed Changes' to the Milton Keynes and South Midlands Sub-Regional Strategy which are currently subject to public consultation.

2. Background

- 2.1 Regional Planning Guidance for the South East (RPG9) identifies the general area of Milton Keynes and the South Midlands (MKSM) as one of four major growth areas in the wider South East. RPG9 proposed undertaking a sub-regional study to investigate what the nature, possible extent and location of future growth might be. Subsequently, the Government's Sustainable Communities Plan emerged as the major driver of the MKSM Strategy.
- 2.2 A MKSM Study was commissioned in July 2001. Three growth sub-areas were identified - Bedfordshire and Luton, Milton Keynes and Aylesbury Vale and Northamptonshire. The final report, published in September 2002, concluded that the study area has considerable potential for sustainable economic growth over the next 30 years that would be of benefit locally and nationally. It also concluded that the preferred option would focus growth on the six settlements of Northampton, Milton Keynes, Bedford, Luton/Dunstable/Houghton Regis and Kettering/Wellingborough/Corby. Given the study area straddled the three counties of Buckinghamshire, Bedfordshire and Northamptonshire and not Hertfordshire, the County Council, whilst aware of the study, was not involved.
- 2.3 Consultants then carried out growth area assessments for each of the potential growth locations to recommend housing figures for the sub-

regions. It was at this stage that the growth assessment of the Luton/Dunstable/Houghton Regis conurbation began to raise matters outside the geographic boundary of the SRS and introducing proposals within Hertfordshire, in North Hertfordshire District. North Hertfordshire District Council and the County Council then actively engaged in the latter stages of the Strategy preparation process.

- 2.4 The MKSM Study and separate growth location studies informed the preparation of a draft SRS which was published for consultation in July 2003. The Strategy sought to provide a long term spatial vision for the Sub Region up to 2031 and was comprised of two parts:
- Part A an over-arching strategy for the whole of the sub-region.
 - Part B containing three separate statements containing specific guidance for each of three Sub-Areas (Bedfordshire and Luton, Milton Keynes and Aylesbury Vale and Northamptonshire) – the scale, location and timing of development, associated transport, employment and social infrastructure, and the delivery mechanisms needed to meet the Government's vision of sustainable communities.
- 2.5 The draft Sub-Regional Strategy was subject to an Examination in Public in March/April 2004 chaired by a Panel appointed by the Government. The County Council's response¹ to the consultation on draft SRS and views presented to the EIP related generally to Part A of the SRS and that part of the Part B statement relating to Bedfordshire and Luton having most implications for Hertfordshire – i.e. growth proposals associated with the Luton/Dunstable/Houghton Regis (LDHR) conurbation.
- 2.6 The EIP Panel reported on its recommendations in August 2004 and the SoS has recently issued for consultation his 'Proposed Changes' to the SRS in response to these. The consultation ends on 23rd December 2004 and the County Council's response will be considered by Cabinet on 13th December 2004. This report presents some initial officer views on the potential implications of the SoS's Proposed Changes.
- 2.7 Changes to planning legislation mean that, when ultimately adopted by the Secretary of State, any Sub-Regional Strategy (SRS) for the MKSM Growth Area would comprise part of the statutory development plan (in lieu of 'abolished' Structure Plans) in providing the strategic planning framework within which local planning would take place. As such, the SRS would comprise Alterations to the Regional Spatial Strategy for the East of England, East Midlands and the South East of England. Being ahead of the production of the Regional Spatial Strategy for the

¹ HCC Cabinet 13th October 2003 – 'Sub Regional Planning: Milton Keynes and South Midlands Sub-Regional Strategy, Consultation Draft, July 2003' and subsequent letter from the Director of Environment dated 14th October 2003.

East of England as a whole, the SRS would represent the first element of the spatial strategy for the East of England to be put in place.

- 2.8 A copy of the EIP Panel Report and the SoS's Proposed Changes are available in the Members' Room.

3. The EIP Panel Recommendations and the SoS Proposed Changes

- 3.1 The EIP Panel came to a significant package of conclusions and recommendations on a wide range of matters – not only on the approach and content of the SRS, but also process issues such as the manner in which the SRS has been prepared, the adequacy of democratic processes and public involvement and how the SRS should move forward in terms of delivery.

- 3.2 In taking forward the Panel's recommendations, the SoS's Proposed Changes effectively represent a re-write of the SRS, though the general thrust of the growth proposals remain as contained within the 2003 consultation draft. However, the EIP Panel's conclusions also touch upon some significant and potentially sensitive issues for the SoS and the Regional Assemblies other than the content of the SRS, which the SoS's Proposed Changes themselves cannot address.

- 3.3 Some of the key recommendations of the Panel are summarised below, along with how they have been handled in the SoS's Proposed Changes. Where appropriate, reference is also made to those matters upon which the County Council has previously expressed views, either in response to the consultation on the draft SRS or in evidence and representations to the EIP.

The justification for the geographic extent of the Growth Area

- 3.4 The Panel concludes that *'The area chosen for the Sub-Region was somewhat arbitrary, and perhaps this was inevitable when trying to define a growth area'*. The Panel also notes *'the lack of homogeneity or a common sense of place across the area'* and that *'There does not appear to have been any evaluation to seek a more rational or functional area definition'*. The County Council's response to EERA's 'request for advice' in relation to the emerging RSS14 raises similar concerns regarding the lack of a transparent basis for defining the geographic extent of the London-Stansted-Cambridge Growth Area, which was subsequently extended to Peterborough (and at the same time to Stevenage).
- 3.5 Whilst clearly expressing some reservations regarding the extent of the growth area and hence the SRS itself, the Panel's overall conclusion is that there is a case that the MKSM Sub-Region is a suitable area for a strategy, *'although it was by no means the only option'*.

Scale of growth

- 3.6 The scale of growth proposed within the draft SRS was in line with the high growth scenario considered by the MKSM Study. In response to consultation on the draft SRS, the County Council called for a re-evaluation of the assumptions behind the preferred 'high growth' spatial strategy in light of the separate growth assessments for the sub areas of the region, within which there were indications that in some areas lower growth might be more appropriate. However, the Panel has concluded that the scale of growth proposed within the draft SRS is commensurate with both the likely actual future needs of the Sub-Regional Area as well as meeting the Government's aspirations for growth. It also concludes that there is justification and a necessity for a strategy to provide for significant growth in the Sub-Region and ensure that this is delivered in a sustainable way.
- 3.7 The SoS's Proposed Changes provide, within Strategic Policy 1, for 169,800 dwellings in the period to 2021 at the six growth locations [26,300 of which would come forward in the urban areas of LDHR (with Leighton Linlade)]. This is broadly in line with the recommendations of the EIP Panel.

Scale and balance of homes/jobs within the Luton/Dunstable/Houghton Regis and Leighton Linlade area (within the 'Statement for Bedfordshire and Luton' within the East of England Region)

- 3.8 The Panel has concluded that a substantial proportion of the draft SRS proposals for LDHR to 2021 would cater for internally-generated needs arising from factors such as the conurbation's relatively young age structure. Recently the growth pressures have been increasingly diverted north, often with weaker sustainability credentials, because the restrictive nature of the tight Green Belt around LDHR has not made it possible to meet them in or around the urban area. The Panel concludes that this should not continue. The Panel also considered whether or not to include Leighton Linlade (LL) as an urban area towards which growth should be directed in addition to the LDHR conurbation, which the draft SRS did not provide for. The Panel concludes that it should.
- 3.9 The consequence of this is that Dunstable and Houghton Regis, together with Leighton-Linslade should accept 90% of the growth allocated to South Bedfordshire District in the SRS. This raises the figure for LDHR (with LL) from 20,500 dwellings in draft SRS to 26,300 dwellings in the Proposed Changes, which reflect the Panel's recommendations. This increases the amount of development that will need to be provided on the periphery of LDHR and LL and therefore potentially impacts upon Hertfordshire.

Timescale – Growth to 2021/2031

- 3.10 The draft SRS contained indicative levels of growth for the SRS area for the period 2001-2031, but only identified totals to be provided specifically within the six growth sub-areas for the period to 2021. The SoS's Proposed Changes contain specific housing growth figures for each of the growth sub-regions to 2031 as *'uncommitted planning assumptions purely for the purpose of Green Belt reviews'* and subject to testing through LDD processes and subject to future review. The total figure for the six growth locations is 103,000 dwellings for the period 2021-2031, 15,400 of which are identified for LDHR conurbation and LL. This has potential implications for Green Belt reviews around the LDHR conurbation within North Hertfordshire.
- 3.11 Whilst the EIP Panel and the Proposed Changes retain the high growth scenario, it is clear that the SRS is extremely challenging and complex, will require significant resources and delivery mechanisms and monitoring. The form the draft SRS takes and whether it is desirable and achievable will be tested through LDD processes, with community and stakeholder involvement. That very testing process may have implications for the SRS. Reflecting this uncertainty, the EIP Panel has recommended a 5-yearly review of the SRS (there is a commitment in the SoS's Proposed Changes to review, but not 5-yearly). Even though the Proposed Changes acknowledge that the figure to 2031 *'are without commitment at this stage and will be subject to future review'* it could be viewed that planning for Green Belt releases for as long a timeframe as 2031 is premature.

Urban regeneration and greenfield development - a spatial strategy relying heavily on urban extensions

- 3.12 In its response to the consultation on the draft SRS and in representations to the EIP, the County Council welcomed the overall focus for urban regeneration and renaissance but expressed concerns that the spatial strategy relied too heavily on greenfield and Green Belt peripheral development to achieve the growth aspirations of the SRS. With regard specifically to Luton, the County Council advised that there has not been a satisfactorily robust assessment of the potential for regeneration within Luton, particularly with regard to that which might be forthcoming from land currently within employment use.
- 3.13 The Panel has concluded that the principle of maximising the use of previously developed land was not expressed clearly enough in the draft SRS and has recommended appropriate wording with Strategic Policy 3 to this effect (*'maximising the contribution of previously developed land to the Sub-Region's growth'*). The Panel has also concluded that recycling of employment land in the LDHR conurbation is likely to continue and that a more interventionist approach be taken to the active management and recycling of all categories of previously

developed land to help drive up supply. The Panel has recommended similar wording in relation to maximising opportunities for recycling redundant and under-used land in the LDHR/LL growth location. These have been integrated into the SoS's proposed Changes.

3.14 However, the Panel has also concluded that *'Sustainable urban extensions will not be sustainable unless the urban areas to which they relate also maximise their potential. The two elements need to be planned and managed in a complementary way.....This does not mean.....that all previously developed sites must be developed before any greenfield sites are considered: brownfield opportunities, like those on greenfield land, arise at different times and may take time to bring forward, because of infrastructure or other constraints. The obvious conclusion is that plans need to establish a synergy between greenfield and PDL sites and ensure that development is managed accordingly'*. In relation specifically to the LDHR conurbation, the Panel concluded that *'Although every effort needs to be made to maximise the use of previously-developed land within the built-up area of LDHR it is clear that a substantial amount of development on greenfield land will be necessary if the proposals for growth are to proceed'*.

3.15 It seems clear that the Panel expects development needs to be managed so as to ensure that the use of previously developed land is maximised. However, this will be entirely dependent upon how effective this management is. A number of the Panel's recommendations seek to ensure that this management exercise does not draw the focus away from urban regeneration initiatives. Indeed, the Panel notes that *'Infrastructure constraints are likely to prevent much progress being made in implementing urban extensions in the immediate future.....we consider it imperative that efforts are focused initially on beginning to upgrade the image of the whole urban area. This will be the major challenge for the proposed UDC and its partners over the next five years or so and will require the deployment of substantial resources'*. Nevertheless, there are examples of subtle changes or additions to the Panel's recommendations within the SoS Proposed Changes which seem to place a greater focus on the delivery of greenfield extensions.

3.16 Lord Rooker has recently written to local authorities affected by growth proposals at LDHR/LL referring to technical work to explore opportunities for regeneration and Green Belt releases for urban extensions (see paragraphs 3.37-3.43 below).

SRS 'straying' beyond its geographic scope into Hertfordshire

3.17 The draft RSS identified land (at Cockernhoe in North Hertfordshire) within Hertfordshire as a housing reserve site. In its response to the draft SRS consultation and in representations to the EIP, the County Council questioned the legitimacy of a process that sought to identify a

site for development outside the geographic extent of the SRS. It also identified a range of reasons why the Cockernhoe site did not represent a sustainable location for an urban extension to Luton.

- 3.18 The Panel has not recommended that the Cockernhoe site or any other specific site around the LDHR conurbation or LL be identified for peripheral development. It is of the view that the complexity of the matters would go far beyond the scope of the information available to it, the time available to examine it, or the proper context for community involvement in site-specific planning. It is of the view that resolution could only be achieved through an appropriate LDD or joint LDDs. The Panel has recommended an *'arc of search for urban extensions and safeguarded land beyond the present Green Belt boundary from west of Dunstable to south of Luton'*, which of course incorporates land on the periphery of Luton within North Hertfordshire. This potentially has greater consequences than the reserve site proposed within the consultation draft of the RSS, particularly when coupled with the commitment in the SoS's Proposed Changes for Green Belt reviews to 2031.
- 3.19 Whilst the SoS's Proposed Changes accept the thrust of the Panel's recommendations, it has sought to focus the area of search *'from west of Dunstable to the A6 in the north; and to the east and south east of Luton, south of the A505'*. In doing so it seeks to exclude some areas around the periphery of the conurbation which the Panel was clearly of the view should at least be considered, even if subsequently discounted. The view could be taken that the whole of the periphery of LDHR/LL should be included in any review.

Sustainability

- 3.20 The Panel considers that the growth strategy cannot simply be about building more houses and that the linkage between housing, economic growth and employment needs to be made much more explicit and have made recommendations too this effect.
- 3.21 The Panel also recognises that the SRS must be much more explicit about ensuring that development that takes place is truly sustainable - *'The MKSM strategy will achieve its purpose if the places it creates are exemplary, and if the rate of change it brings about means a rate of improvement, solving problems rather than creating them.'* The Panel has made a range of recommendations which seek to ensure which it considers *'will strengthen and improve the SRS, and help to ensure that sustainable development takes place'*.
- 3.22 On the whole, the SoS's Proposed Changes reflect the Panel's recommendations. However, there are a number of instances where the Panel's recommendations have not been taken forward by the SoS. For example, the Panel recommended that the SRS should provide for sub-regional implementation and guidance documents, to include,

amongst other matters ‘*Guidance for consistent application of available best practice standards on the creation of sustainable communities*’, prepared under the auspices of the Inter-Regional Board. This recommendation is not integrated into the Proposed Changes.

Infrastructure requirements of the SRS

- 3.23 In responding to the SRS the County Council raised concerns regarding the requirement to ensure that growth is coupled with appropriate commitment to infrastructure provision and management. The EIP Panel has come to a number of conclusions relating to infrastructure provision, whether it be social, green or transport/utility-based, all of which support the desirability of growth and infrastructure progressing hand in hand. The Panel has recommended a range of changes to provide the critical assurance sought by very many of the participants in return for their acceptance of the Strategy that resources will be made available to meet the Government’s stated commitment to ‘no infrastructure, no growth’. On the whole, these have been incorporated into the Proposed Modifications.
- 3.24 In responding to the consultation on the draft SRS, the County Council advised that the M1 is already one of the most congested roads in the country and plans to widen sections of it seek to increase its capacity to tackle severe existing congestion issues. The County Council considered it to be crucial that future growth in the sub region does not compromise the benefits sought by widening the M1 and other key schemes. The County Council’s concerns regarding the links between growth and transport infrastructure are also being picked up in a study just commissioned jointly by GO-East and the Highways Agency. The purpose of this study is to ensure that the potential for the northward expansion of the LDHR conurbation and options for northern bypass routes do not come forward with potentially conflicting proposals.
- 3.25 In responding to the draft RSS, the County Council expressed concerns that the spatial strategy included proposals for an eastern Luton Airport bypass as proposed in SERAS. The County Council advised that such a proposal has no status and would only potentially be required in the event of significant increases in capacity at Luton Airport and that beyond the scale envisaged in the growth strategy. The County Council advised that not only would the eastern airport bypass have no value in improving the accessibility of the proposed reserve housing development site in Hertfordshire (see above), the Luton East Circular proposals would provide adequate road capacity to meet the future needs of the airport, raising doubts over the need for an eastern airport bypass in the first place. Whilst the Panel recommendations retain provision for an eastern Luton Airport Bypass, it does not feature explicitly within the SoS’s Proposed Changes.

Luton Airport

- 3.26 The EIP Panel concluded that it would not be advisable to increase the quantity of growth to be planned for at LDHR purely on the basis of possible airport growth scenario to 2030 at Luton Airport associated with the Government's Airports White Paper. This is because the airport is heavily dependent on low cost (no frills) airline operations. Accordingly, the EIP Panel makes no specific recommendations in tying growth directly to the airport, though it does include proposals for an eastern Luton Airport bypass (see paragraph 3.25 above).
- 3.27 The SoS's Proposed Changes include text not proposed by the EIP Panel which identifies:
- Luton Airport as a key driver of the economic development of the Luton Dunstable conurbation
 - the imminent preparation of a master plan for the Airport's growth
 - the requirement for LDDs to implement the SRS to consider the possibility of urban extensions to the east and south east of Luton
 - that any transport proposals and development proposals will need to cater both for the urban extensions and for the growth of the airport.

Affordable housing

- 3.28 The EIP Panel has recognised the importance of affordable housing provision and given consideration to matters such as targets and funding. On the whole, the Panel has recommended strengthening the SRS statement on affordable housing, but feels that targets need to be set locally based on local assessments and that funding is a matter outside the remit of the SRS itself. In relation to funding, however, the Panel does recommend that the SRS should resolve whether the SRS depends on a substantial additional injection of public funding for affordable housing or not. The SoS's Proposed Changes do not provide clarity on this matter.

SRS Preparation

- 3.29 The Panel has made a number of observations relating to the manner in which the SRS was prepared. For example:

'The speed at which the exercise had to be done meant that consultants played a major part in making the proposals. More time in the preparation would have enabled a better and more consistent document to be pulled together. It would have enabled a more participatory process, and greater ownership of the strategy by the people and organisations who will have to implement it.'

'Whilst we appreciate the urgency with which the growth areas need to be approached, there really is a danger of more haste-less speed.'

- 3.30 The Panel clearly had concerns that the speed at which the Government Offices and the Regional Assemblies are preparing SRS is potentially compromising its quality. The over-reliance on consultants studies and their outputs, rather than the development of an SRS by the responsible bodies informed by relevant and necessary consultants studies, is a matter of particular concern and raises questions about the ability of those bodies, as currently resourced, to perform their functions.
- 3.31 Encouragingly, the Panel concludes that *'We believe there are important lessons to be learned from the MKSM Examination which may help to improve the effectiveness of the system'*. Unfortunately, however, the concerns of the Panel have resonance with a number of those raised by the County Council in its response to EERA's 'request for advice' from s4(4) authorities in relation to the preparation of RSS14. That response questions the quality of a number of consultancy studies and the transparency with which they have been used to prepare the draft RSS and the danger that speed is potentially compromising quality and process.

Democracy/community involvement

- 3.32 One of the major concerns expressed by the County Council in responding to the consultation on the draft SRS and in evidence to the EIP was the lack of involvement of local authorities and communities in Hertfordshire in an SRS process which contained specific proposals within the County.
- 3.33 The Panel has raised some fundamental concerns in relation to the *'community involvement deficit'* in the way the Strategy had evolved and considers that it is essential from here on that local communities, and the local planning authorities that represent them, are fully engaged in the process. It is of the view that the Strategy needs to be effective, adaptable and inclusive. The Panel noted that *'Despite the controversial nature of the SRS, many of the Examination sessions were sparsely attended by the general public. A concerted effort needs to be made to ensure thorough community involvement in RSS, not only to meet new statutory requirements, but also to ensure that the decisions that are made have public confidence and support, without which they will prove difficult to implement'*.
- 3.34 In addition, the Panel were concerned that *'the Government Offices appeared to be slow to recognise that it is incumbent on the Secretary of State, as the decision making authority, to consider all the representations made, including all those not relating directly to the matters selected for Examination which are the focus of the report (in this his role is analogous to that of a County Council preparing to adopt its Structure Plan). No doubt this is now being done. For the future, whether it is seen as a task for Government Offices or to be delegated to Regional Assemblies, we recommend that sufficient resources for*

processing the consultation response are identified at an early stage and programmed into the process in a timely way. We also consider that it would be highly desirable for outputs from the database, including summaries of the responses, to be made available to participants and the public. Given the increasing reliance being placed on electronic communication we believe this could be of immense help, particularly to small organisations, in preparing their case for the Examination. It could also be of help in improving transparency and public involvement'.

- 3.35 There is currently no evidence that the Government Offices/Regional Assemblies have considered all the representations made to the draft SRS. In its Schedule of Proposed Changes there are no references to changes which have been made in response to representations made to the draft SRS. All changes seem to reflect recommendations of the EIP Panel or new text introduced by the SoS.
- 3.36 The Panel points to a number of its recommendations which seek to resolve the democratic/public involvement inadequacies of the SRS process. For example in relation to urban regeneration and the scale and location of greenfield and Green Belt releases, the Panel recommend that decisions be made through the preparation of LDDs at the local level and involving local communities. It also seeks to clarify the role of consultancy studies in the process, some of which identified particular possible development locations. The Panel concludes that it should be made clear that these studies have *'not predetermined local spatial issues, and have no formal planning status. The counterpart to this is that we make various recommendations about the role of LDDs or other local planning initiatives in implementing the strategy. This will ensure local ownership and community involvement and proper representation of development interests in the detailed choices that have to be made about development'.*

Resources/Effective Delivery

- 3.37 The EIP Panel recognised the importance of LDDs in delivering the SRS, the timetable for which *'will be challenging, considering the magnitude, complexity and no doubt controversial nature of some of the LDDs that will need to be prepared'.* The Panel *'strongly recommended that the ODPM and the Inter-Regional Board consider ways of supporting and supplementing the resources of the relevant local planning authorities to enable them to achieve the necessary high quality of output in the limited time that will be available'.* The SoS changes do include a commitment to the preparation of LDDs and to funding, though no reference is made to supporting and supplementing the resources of local authorities.
- 3.38 The Proposed Changes also state that where LDVs are established to deal with cross-boundary issues, it would make sense to tie LDD preparation in with the boundaries of LDVs and there should be a

presumption in favour of Joint LDDs. One of the candidates for this approach is in relation to LDHR and LL, to include Luton, South Bedfordshire and North Hertfordshire (to plan for LDHR and LL), together with Aylesbury Vale (in respect of LL).

- 3.39 The EIP Panel consider that appropriate partnerships would be key elements in the successful delivery of the Strategy but did not see it as being within its remit to comment on different types of Local Delivery Vehicle. The need and arrangements for any necessary joint working will need to be considered by the local authorities affected by the Strategy proposals for LDHR and LL.
- 3.40 In relation to LDHR/LL, the EIP Panel concluded that it is *'imperative that efforts are focused initially on beginning to upgrade the image of the whole urban area. This will be the major challenge for the proposed UDC and its partners over the next five years or so and will require the deployment of substantial resources'*. Despite this, Lord Rooker is of the view that until more is known about the locations and timing of growth in the LDHR conurbation he will not be in a position to take a final decision about whether and when to establish a UDC for the area.
- 3.41 Lord Rooker has recently written (8th November 2004) to local authorities affected by growth proposals associated with LDHR/LL. He has indicated a willingness to fund a study to explore urban capacity issues within the conurbation, options for peripheral Green Belt releases for urban extensions and the type of local delivery vehicle that may be required. He is also prepared to contribute up to £50,000 in 2004/05 and up to £100,000 in 2005/06 towards the costs of a joint unit and a joint planning committee of local authorities to 'drive forward the assessment of growth options, prepare Local Development Documents and enhance delivery capacity'.
- 3.42 North Hertfordshire District Council Cabinet is to receive (23rd November 2004) a report on the SRS within which reference is made to the District's approach to joint working. The Council has already agreed that it should be involved in all aspects of relevant technical work, but would not be prepared to commit at this stage to any political involvement, such as agreeing to joint LDD work and to taking part in a UDC. As the proposed ODPM/GO-East Study is of a technical nature, the officer recommendation to North Hertfordshire District Council's Cabinet is that the Council should play a full part in it, subject to the steering authorities having the ability to control the direction of the study and that involvement would not represent a commitment to joint LDDs or a UDC at this stage.
- 3.43 The County Council has previously supported active participation in any LDV, including an Urban Development Corporation, if the MKSM process ultimately identified proposals in Hertfordshire. Now that EIP process is complete, The County Council will need to review its position

in light of the closure of the EIP and the report of the Panel, the SoS's Proposed Changes and Lord Rooker's recent letter.

Review timetable and approach

- 3.44 The EIP Panel concluded that given the unusually long-term inter-regional strategy to 2031, the SRS needs to have a clear focus which can be pursued with commitment and persistence by the various bodies set up to implement it. This is not likely to be achieved unless it is contained within a single, unified and regularly reviewed format (rather than through Alterations to three separate RSSs). The Panel recommended wording proposed a review every 5 years. In the Proposed Changes, the SoS has not committed to a five-yearly rolling programme of review.

4. Conclusions

- 4.1 In light of the above, there are a range of matters upon which the Panel may wish to express a view. These might include:
- continued concerns relating to the justification for the geographic extent of the Growth Area.
 - the scale of growth proposed within the Growth Area.
 - the balance between urban regeneration and greenfield/Green Belt development.
 - whether the Green Belt Review around LDHR should encompass the whole of the perimeter of the conurbation.
 - the wisdom of providing for Green Belt releases to 2031 at this stage.
 - a reiteration of the County Council's concerns relating to growth and infrastructure provision.
 - clarification on the extent to which the SRS is reliant upon public funding for affordable housing provision.
 - concerns relating to the manner in which the SRS and the Proposed Modifications have been prepared, for example in relation to over-reliance on consultancy studies and lack of transparent consideration of responses made by consultees on the draft SRS.
 - the requirement to redress the lack of democratic/community involvement to date in taking the SRS forward.
 - the desirability of an early review of the SRS given the current uncertainty in relation to deliverability.
 - the need for effective delivery mechanisms accompanied by a significant commitment of Government resources.
 - the extent to which the County Council should become involved in technical work or formal joint working arrangements on joint committees/LDVs.
- 4.2 Officers are currently in the process of drafting a report to be considered by Cabinet on 13th December. Panel's views are sought on

the EIP Panel Report, the SoS's Proposed Changes and any of the issues raised in this report.