

**EAST OF ENGLAND PLAN – CONSULTATION ON THE
DRAFT REGIONAL SPATIAL STRATEGY FOR THE EAST OF ENGLAND
(Report by Head of Planning Services)**

1. INTRODUCTION

- 1.1 This report sets out the most significant elements of the East of England Plan (draft revision to the Regional Spatial Strategy for the East of England) issued for consultation in December 2004 and seeks approval for the content of representations to be made to the Regional Assembly.

2. BACKGROUND

- 2.1 The draft East of England Plan was submitted to ODPM on 25 November 2004. The letter accompanying the submission stated that the Regional Assembly did not believe it would be possible to deliver increased growth rates without significant investment in infrastructure. Following announcement in early December of the outcomes of the government's spending review for 2005-08 the Regional Assembly voted on 10 December 2004 to suspend its endorsement of the draft East of England Plan pending a re-examination of the government's willingness to provide adequate financial support for the infrastructure necessary to service the anticipated level of growth. However, the Regional Assembly reiterated its commitment to the public consultation on the draft East of England Plan to gauge the response to the development proposals.
- 2.2 The consultation is due to close on 16 March 2005. Permission has been sought to submit our representations on 18 March to follow the decisions made by this meeting. An examination in public is scheduled to start on 13 September 2005 with final approval anticipated by autumn 2006.

3. EAST OF ENGLAND PLAN PROPOSALS

- 3.1 The key strategy of the East of England Plan proposes –
- ◆ Employment led growth based on key economic sectors and cluster development.
 - ◆ A stronger focus on regeneration of lagging areas.
 - ◆ A 15% increase in future housing provision.
 - ◆ A doubling of affordable housing output.
 - ◆ A proactive approach to implementation.
 - ◆ A regional transport strategy pursuing a more sustainable approach to future transportation planning.
- 3.2 The Plan proposes a total of 478,000 additional dwellings in the region for the period 2001-2021, equating to 23,900 per year. Of these 89,300 are allocated to Cambridgeshire and Peterborough of which 11,200 are allocated to Huntingdonshire, equating to 560 per

year. To put this in context the 1995 Cambridgeshire Structure Plan allocated 820 dwellings per year to Huntingdonshire for 1991-2006. Some 9,684 dwellings have been completed in the district between 1991 and March 2004, with 2,344 outstanding permissions and 2,848 dwellings allocated as at March 2004.

- 3.3 Two particular points of controversy have arisen during the preparation of the Plan. Firstly, whether an additional 18,000 dwellings requested by the Government could be added to increase the total allocation to 496,000. Detailed studies were made investigating the potential for additional growth in the London-Stansted-Cambridge-Peterborough corridor to increase the contribution to the Sustainable Communities Plan. Secondly, the Aviation White Paper's proposal for a second runway at Stansted Airport. The Regional Assembly decided to not incorporate the additional 18,000 dwellings as they were not convinced of either the need for them, or that they could be provided in a sustainable manner. The Assembly also remain unconvinced of the economic benefit of a second runway at Stansted and consider the environmental impacts to be unacceptable.

4. SUGGESTED REPRESENTATIONS

- 4.1 Representations need to be made to the Regional Assembly on issues concerning the Plan as a whole and on specific points within the document. The Plan is heavily premised on the need for the Government to ensure that the step change in growth and housing numbers for the region as a whole is fully underpinned by infrastructure provision. Although the Plan itself is not concerned with the financial aspects of ensuring the implementation of its strategy, it would seem reasonable to make representations concerning the necessity of adequate financial support for such infrastructure provision. Otherwise the step change in housing provision may not be possible which could result in increased pressures for growth in Huntingdonshire resulting from diversion of growth from more congested areas, or increased housing shortages.

- 4.2 Other issues concerning the Plan as a whole on which representations need to be made include –

- ◆ The excessive length of the document.
- ◆ Frequent and unnecessary repetition of PPG and PPS guidance.
- ◆ Difficulty of navigation of the Plan.
- ◆ Lack of a cohesive approach to the sub-regional elements, including significant repetition of strategic approaches in each section that could be addressed once in chapter 4.

- 4.3 More specific issues of concern within the document include –

- ◆ Inconsistency between policy H1 which gives housing numbers for each district and policy CSR2 which gives the scale of housing provision and distribution in the Cambridge sub-region.

CSR2 should be amended to allocate dwelling numbers to specific districts to facilitate implementation.

- ◆ In policy SS13 affordable housing should respond to local needs levels, not set a minimum figure.
- ◆ Para 5.114 expresses the expectation that employment development will also be expected to contribute towards affordable housing. Objection should be raised to this as it is inappropriate in many parts of the region which already struggle to attract employment growth. The Plan should be altered to suggest that this only be applied in areas where there is both high demand for employment development and shortages of affordable housing.
- ◆ Policy E2 allocates job growth targets, including 500 jobs to the 'rest of Cambs'. These should be redirected to the two sub-regions within the county as the only areas left outside these two sub regions are Littleport, Kimbolton, Buckden and Ellington, where clearly employment growth of this scale is inappropriate.
- ◆ Policy E2 sets targets for growth in jobs rather than the amount of employment land to be allocated. An additional supporting section is required distinguishing between employment targets and employment land release.
- ◆ Paragraph 6.19 concludes with the statement that "where a need is identified, readily available serviced strategic employment sites solely for warehousing and distribution will also be proposed". This requires amending not only to refer to 'need' but also where such development can contribute to a sustainable pattern of distribution.
- ◆ Policy H2 considers affordable housing and mix of housing types. It contains no reference to a requirement for Local Development documents to assess the need and provision of gypsy and travellers sites.
- ◆ Paragraph 5.112 refers to the redevelopment of Alconbury Airfield for significant employment use and comments that it may be suitable for the successful relocation of aircraft maintenance facilities from Cambridge Airport. Whilst it is recognised that this is one of the options under consideration it is by no means clear that this would be the most appropriate option (or even available) or what the implications would be if this were to become the preferred option. Strong reservations should be expressed and appropriate changes sought to the text of RPS.

4.4 A number of elements within the Plan are worthy of specific support, these include –

- ◆ Policy SS2 which sets out the strategy of urban concentration to 2021. It advocates an early review of the Plan; this review should go further than the suggested consideration of a major new settlement.
- ◆ Policy H1 which sets out the level of housing provision. The targets for the local area strongly focus on Cambridge city and South Cambridgeshire to try to provide more homes in close

proximity to employment concentrations to reduce commuting levels.

- ◆ CSR1 which sets out the location of housing and related development in the Cambridge sub-region contains a specific reference to the reuse of Alconbury Airfield for employment and flexibility to modify the sequence of land search to ensure a sustainable pattern of development in the vicinity, if required.

5. RECOMMENDATION

- 5.1 That the Cabinet agree that representations be made to the Regional Assembly based on the general and specific points raised above.

BACKGROUND PAPERS

East of England Plan - Draft revision to the Regional Spatial Strategy for the East of England (2004)

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