

Policy paper – East of England Plan

About Sustainability East

Sustainability East is an independent body whose aims are to promote sustainable development (SD) in the East of England by bringing together people with relevant experience and expertise from across the region and across disciplines to explore issues, challenge current practice, raise awareness, change perceptions, and act as “critical friend” to regional bodies in the integration of economic, environmental and social policies.

This is Sustainability East’s view on the East of England Plan published May 2008. This note reflects our collective view, but not necessarily that of all the organisations from which our members are drawn.

What is the issue?

The East of England Plan or 'RSS' sets out the regional strategy for planning and development in the East of England to the year 2021. It covers economic development, housing, the environment, transport, waste management, culture, sport and recreation and more.

Sustainability East believes the RSS has a key role in contributing to the sustainable development of the region. In the particular we welcome:

- a greater emphasis on reducing carbon emissions with requirements to develop regional targets for the carbon performance in new development and major schemes to source their energy for decentralised renewable or low carbon supplies.
- objectives for improved water efficiency and reducing per capita consumption rates
- provision of more green infrastructure with networks of multifunctional green space as the basis for sustainable growth
- commitment to eliminating landfill of untreated waste by 2021
- greater protection for European and internationally protected wildlife sites
- recognition of the need to align jobs with housing
- focus on skills to bring people out of poverty

Nevertheless, we retain serious concerns about whether the levels of growth and development proposed in the East of England Plan can be delivered in a genuinely sustainable way.

We are concerned about impacts on:

Environmental limits

Development on the scale set out in the East of England Plan could exceed the region’s environmental limits. However, we recognise that understanding of what is meant by limits, thresholds and capacity, remains unclear, and how to measure them even less so. There is now an urgent need to determine what environmental limits mean in practice, and be clear how they should inform decision-making at both the strategic and local level.

We note that the housing numbers in the Plan are set as minima not maxima. We are concerned that environmental impacts of exceeding these figures remain unclear.

Quality of life

We are concerned that the rate and intensity of economic and housing development which the region faces is damaging to the environment and threatening to many aspects of quality of life; for example: irreversible damage to landscapes; wildlife habitats; rural tranquillity; water resources; air quality; recreational opportunities; and the character of historic cities, villages and towns. Traffic would also increase, worsening already bad congestion and contributing to climate change.

Last year, the Sustainable Development Commission (SDC) reported that a rush to meet housing targets could result in developments without vital services, public transport green spaces or a sense of community¹. Using examples of developments in Cambridgeshire, amongst others, the report identified areas for improvement including: better coordination of public funding so that transport, schools and health services are provided on time; high-quality community gardens, parks and sports areas should be integral to the design of new communities; and involvement of residents in shaping developments and planning their future, to foster a greater sense of community. Furthermore, it will be vital that jobs and housing growth are realistically geared to each other to avoid fuelling of unsustainable commuting trends.

Built environment

Buildings should enable all people to live well, within environmental limits. They should reduce whole life carbon and materials costs by enabling resource efficient operation (energy, waste, water). They should provide environments that contribute to physical and mental health, be designed to be flexible and adaptable to future uses, and, be resilient to cope with local effects of climate change.

We support initiatives to improve the environmental performance of new housing. We are also pleased that the Plan accepts that environmental infrastructure needs have to be integrated into new housing. However, the current 6-star standard for sustainable homes (the highest sustainability rating possible under the voluntary Code for Sustainable Homes) should be mandatory for all new housing. This will require significant investment in the technology, infrastructure and knowledge needed to support its delivery as well as a mechanism to ensure the standards are applied.

There is also still a need to improve the environmental performance of existing homes and new non-residential buildings. Reusing and refurbishing existing and empty properties could actually save more carbon dioxide than constructing new ones².

Infrastructure

We have doubts whether the infrastructure required to support the scale of the growth set out in the Plan can be delivered. Substantial investment will be required for sustainable transport, renewable energy, flood risk management, waste management, water supply and all the other essential elements of well planned and sustainable development. Furthermore all civil engineering and public realm projects in the region should attain high environmental and social performance in project specification, design and construction.

It is our view that growth should be phased and, if necessary, restricted to ensure timely provision of infrastructure and services to support sustainable communities.

Natural environment

The Plan contains good policies for enhancement of nature and landscape, and the creation of much needed green infrastructure. However, we are concerned about adverse impacts on sites which represent areas of the highest value for natural habitats and species of plants and animals.

¹ Sustainable Development Commission, 2007, "Building Houses or Creating Communities?", May, 2007, URL: http://www.sd-commission.org.uk/publications/downloads/SDC_SCP_report_2007.pdf

² Empty Homes Agency charity, 2008, 'New Tricks With Old Bricks', March, 2008, URL: <http://www.emptyhomes.com/documents/publications/reports/New%20Tricks%20With%20Old%20Bricks%20-%20final%2012-03-081.pdf>

Climate change

We are pleased that the East of England Plan recognises that for the East of England, the combination of vulnerability to the effects of climate change and the level of development with its potential contribution to emissions means that addressing climate change is particularly urgent and challenging. We welcome policies for low carbon development, renewable energy and resource efficiency as well as policies for coastal development, water resources and green infrastructure to help address the impacts of climate change. However, we urgently need to understand what the proposed levels of growth mean in terms of climate change emissions for the region to determine where cuts must be made and how. Regional climate change target must include CO₂, methane, NOX and ozone emissions.

We must also incorporate resilience to climate change in decision-making so we will be better prepared for the future. It is essential that those who have a leading role to play in these decisions fully understand the implications of climate change and respond to the challenges it poses.

Sustainability East recommendations for action:

Regional decision makers

- Carry out further investigation on environmental limits in the East of England, taking forward previous work by EERA and East of England Environment Forum on environmental capacity and limits. This will include building an evidence base on the condition of the environment and developing scientific tools for analysing the changes in the environment that are likely to result from different amounts and types of development and climate change impacts
- Ensure timely provision of infrastructure and services to support sustainable communities
- Set regional targets for reduction in methane, nitrous oxide and ozone emissions

Local Authorities and Local Delivery Vehicles

- Learn lessons from previous attempts to create sustainable communities and apply to future developments
- Embed sustainable development principles in Local Area Agreements and Multi Area Agreements
- Incorporate Code for Sustainable Homes 6-star standard into Development Plan Documents

What is Sustainability East doing?

Sustainability East acts as the focal point for promoting the principles of sustainable development across the region and in coordinating and delivering where necessary, relevant initiatives and programmes to support sustainable growth.

Through delivery of our strategic plan we will be contributing to the evidence base through our work in 4 areas; embedding sustainable development principles in decision making, challenging and informing current assumptions to help create the right growth in the right way, promoting the effective management of resources and championing the rights of all communities to have a voice in their sustainable future (read our strategic plan at www.sustainabilityeast.org.uk)

Sustainability East firmly believes that sustainable development should be at the heart of the forthcoming Single Integrated Regional Strategy. Indeed, we are currently working with regional partners to look at how best to embed sustainable development in the transition to new regional arrangements under the Sub-National Review.