

**EAST OF ENGLAND DRAFT PLAN
EXAMINATION IN PUBLIC**

PARTICIPANT'S STATEMENT BY LIVING EAST

Matter 1: Vision, objectives and parameters for the strategy, including the overall levels of growth to be sought

The context for this debate includes the Regional Sustainable Development Framework, the Regional Economic Strategy (2004), the Sustainable Communities Plan and other Government policy and issues raised by the Sustainability Appraisal/Strategic Environmental Assessment. This will be a regional debate with limited sub-regional elements and it is important that, for example, those with an environmental brief confront the economic issues and that those from the development sector contribute to the environmental aspects. Matter 1A will be a relatively short "high level" discussion of the overall vision and approach of the Plan, considering whether its objectives address the right issues, and relate appropriately to the national and inter-regional context. Questions arising from these issues will be debated in the subsequent sub-matters, with attention being given to the linkages and conflicts between them.

Matter 1D: Protection of the Environment and Use of Natural Resources (2000 word limit encompasses combined questions (i)-(iv))

i) Does the Plan take an appropriate strategic approach to protection of the environment and the use of natural resources, and is it sufficiently integrated with the economic and social objectives of the Plan?

1. Living East is greatly concerned over the potential efficacy of the RSS14 in guiding planning in the East of England. A key reason for doubt comes from the complexity of the document. Excluding sub-regional and sub-area policies (which are necessarily separate), the RSS contains 78 separate policies relating to land use in the region. These are made up of a mixture of what we would regard as genuine regional policy, repetitions of national policy, and statements. To minimise the potential for confusion and contradiction, it is vital that the final RSS simplify policies by following a process such as:
 - Create a hierarchy between policy, guidance and other principles (all of which are currently included as 'policy')
 - Remove repetitions of national policy and guidance from all policy statements
 - To ensure the document is properly integrated, augment information held in the Core Spatial Strategy with the key principles from supporting chapters
2. We do not feel that the draft RSS takes a strategic approach to the environment. From a cultural perspective, Living East recognises the environment, encompassing the natural, built and historic environment, as an important driver of the regional economy; supporting quality of life, creating sense of place, attracting investment, forming a central

element of tourism and leisure. As such it is not simply a biological and cultural resource, but a social and economic one, too. By failing to integrate such an interpretation into the core of the strategy, we feel 'environment' is seen as a barrier to economic growth rather an important element in its achievement.

3. Retaining local and regional distinctiveness is important for tourism enterprises and visitor satisfaction. These links and outcomes will only be delivered if strong policies for protection of the historic, built and natural environments are included in the RSS. Similarly, healthy communities need local spaces where people of all ages can take part in sport and active recreation and play. Taking part in cultural activities positively affects health outcomes and any policy relating to health provision should emphasise the need for all development to encourage healthy living and active lifestyles. Rather than identifying the need for infrastructure to treat the unhealthy, innovative new approaches to health provision such as the development of 'healthy living centres' which combine health provision with leisure and physical activity facilities and programmes should be prioritised in land use planning. In addition, encouraging healthy lifestyles through a stronger link between health and access to social, cultural and recreational opportunities.

ii) What are the environmental constraints to growth? Can environmental capacities be identified, for example in relation to water and other resources and flood risk?

4. Environmental constraints to growth can be defined as constraints to growth as being the level beyond which human activity ceases to contribute to quality of life. Attempts to measure this are complex and generally based around the use of multiple indicators, for example the Government's recently revised sustainable development indicators.
5. Environmental constraints are not limited to the provision of primary material to industry and can rarely be measured in absolute terms. The ability of the environment to contribute to quality of life in terms of an inspiring landscape or sense of place are all too often overlooked in favour of more easily quantifiable measures. To do this is to underestimate the cultural significance of the environment. Measuring this significance requires qualitative study at sub-regional and local level and the employment of environmental valuation methodologies together with landscape characterisation.
6. It is also important not to view the environment as simply a barrier to growth. The natural and historic environment is an important economic driver in its own right, for example for the leisure and tourism sectors. Regenerating rural areas will need to build on tourism as the main economic activity and hence require investment in the natural environment.

7. The role of the natural environment can play in achieving the Plan's vision through improving access, improving quality of provision and using the natural resources of the region to encourage higher levels of physical activity.

iii) Does the Plan take adequate account of climate change, both in terms of reducing emissions and adapting to the effects of climate change on the region?

8. Climate change is likely to have a significant negative impact on the East of England. For the cultural sector, this is likely to include loss of high quality landscapes and archaeology, threat of flooding, increased instances of severe weather, heightened weathering of historic artefacts such as ancient buildings, increased insurance costs and a range of other issues. Against this, there may be limited short-term gains such as warmer summers and longer tourism season. The Plan fails to respond to the scale of the challenge for the region in this area.

iv) How should the Plan respond to the issues identified above, and what are the implications of doing so for the economic and other objectives of the Plan?

9. Living East expects the plan to respond to the issues identified above in the following ways:

In order to take a strategic approach to the protection of the environment and natural resources will require the plan to:

- Amendment of SS1 to include an understanding that, by making the East of England a less attractive place to live, work and visit, damage to the natural and historic environment will undermine the economy of the region. This will directly undermine industries such as tourism that directly rely on environmental resources and their interpretation.
- Living East would regard the use of the Government's sustainable development indicators as the best way of measuring the effectiveness of SS1 (Achieving sustainable development). For such a broad policy, it is unacceptable that the RSS currently intends to measure this policy in terms of dwellings adjacent to urban areas. This should also be augmented by qualitative monitoring.
- SS10 (regional economy) should be amended to emphasise the natural and historic environment as key regional strengths that are in need of investment and enhancement.
- The importance of high quality design in new residential areas is already referred to in policy SS16. A new policy should be introduced which identifies links between the conservation of local character and a range of cultural activities, pointing out that these will also improve the performance of the regional economy; and encourage partnership working between local authorities, English Heritage, the East of England Development Agency, and also the other cultural agencies, (including particularly tourism).

- Health, education and social inclusion cannot be addressed solely through sectoral engagement and financial support, as SS12 currently suggests. A re-drafted policy should draw attention to the cultural, sporting, physical and health benefits of investing in a high quality natural environment.
 - Given the likely severity of the impacts of climate change, Living East would expect the RSS to recognise the cultural effects it will have and to include a commitment to reducing emissions of greenhouse gases, including regional emissions monitoring and reduction targets. A statement should be included recognising the impact of increased air travel on climate change.
10. The implications for the economic focus of the strategy should be the imposition of environmental thresholds for all relevant RSS targets. These thresholds need to encompass both physical and cultural environmental limits. Where such limits are exceeded developers must be required to reduce the environmental impacts of their proposals or have that applications refused.