

**This is COVER's response to EERA's consultation on extending the East of England Plan to 2031.** COVER is a representative body for the Voluntary and Community Sector in the East of England. Our Vision is of a just and inclusive society for the region that recognises and supports the value, and values, of the community and voluntary sector. Our Mission is to increase voluntary and community sector regional influence, activity and recognition.

This response attempts to summarise the key issues coming out of this consultation that are particularly relevant to the Voluntary and Community Sector (VCS). Individual VCS organisations and local partnerships would have additional comments to make according to their understanding of local needs and priorities: these are not summarized here. It is likely that some of our members and partners will be responding separately to this consultation.

Any queries about this consultation response can be directed to:

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## Extending the East of England Plan to 2031

COVER appreciates the need to extend the current plan so that it covers the period to 2031, as required by government. We recognise that there are many complex and sensitive issues surrounding this consultation, and know that developing the updated plan will be a controversial process. We also recognise that these four scenarios have been proposed for the purposes of consultation only, and the Assembly is open to further suggestions.

In order to be able to respond to this consultation effectively, we first considered what the relevant priorities of the VCS for the region are. This list is not exhaustive: there are many issues which the VCS is concerned with! But there are four main themes.

- **Social and economic inclusion**, which in this context is encouraged by improving housing affordability; regeneration of struggling areas; improving accessibility through good transport and social infrastructure investment; investing in community development; and considering the needs of all the different areas in the region: rural and urban, near and far from London, coastal and inland, accessible and not accessible, robust economies and less robust economies

- **Community cohesion**, which in this context is encouraged by development of mixed communities, and investing in community development and social infrastructure
- **Health and wellbeing**, which in this context is encouraged by creating pleasant environments, improving accessibility, both in terms of transport and social infrastructure, and investing in community development
- **Environmental responsibility**, which in this context is encouraged by considering transportation implications, considering the best approach for coastal areas, protecting our areas of natural beauty, and biodiversity

Each of the proposals were then compared against these priorities, as far as possible with the information provided.

### Do you think we've chosen the right growth scenarios to consider?

For the purposes of consultation with the region, the scenarios make sense: they offer a range of alternatives, covering many of the issues that the region will be concerned with for discussion. None of the proposals suggest radical change from the current plan, and we understand that the current review is a refresh rather than a re-write. However, it would have been interesting to consider some entirely different scenarios, involving development of different areas of the region, some of which feel that they have the capacity.

### Do you have any comments on the four growth scenarios?

#### Scenario 1: Roll forward

Growth at major centres can mean that regeneration needs are neglected, and existing urban deprivation issues exacerbated, but this option at least puts some focus on weaker economic areas. Keeping development to existing urban areas could contribute to improving urban communities and health and wellbeing, by focussing resources there. However developing new urban communities and large increases in housing in some areas will require a high level of attention to be paid to community cohesion and social infrastructure, arguably more than an organic increase in all areas would.

This option may have the least impact on affordability of homes. It could contribute to increasing isolation of communities in rural areas and further from London by concentrating development in urban centres.

This option has arguably the least climate change impacts and emissions contributions. It may have less flood risk than the other options, and maximise brownfield use. On the other hand it may worsen air quality in urban centres.

#### Scenario 2: Growth according to capacity

It is unlikely that this option would significantly affect housing affordability in the region. Creating new settlements can be particularly challenging for developing sustainable communities; additional investment into this aspect would be needed.

Concentrating a large amount of growth onto Chelmsford above economic trends could put undue stress on the local area, with negative implications for all the above indicators.

By concentrating growth on urban areas accessibility could be improved, but emerging living environments would be predominantly urban. New settlements would need to be well

supported with infrastructure to assist with accessibility. Rural areas would still be in danger of neglect under the plan.

This option is less good for the environment than Scenario 1, but much better than Scenario 4. Commuting implications could be worsened.

### **Scenario 3: Growth according to economic strength**

By focussing growth on areas of demand for additional workers it may be easier to create sustainable communities. This scenario could contribute to improving the affordability of housing around London.

This option is likely to benefit the regional economy as a whole, but it would focus on the existing economic base rather than diversification, which may not improve economic inclusion, and could contribute to increasing isolation of some areas.

There are some urban areas near London where growth would be focussed that are already struggling with community cohesion, and creating healthy communities. Continuing to build homes in those areas may put undue stress on them.

Substantially developing more rural areas in the south of the region could significantly change their character, and thereby damage community strength in smaller settlements.

This option is also less good for the environment than Scenario 1: roll forward, but much better than Scenario 4 and high growth. Rural areas in the south of the region could suffer from the growth.

### **Scenario 4: Demographic projections**

This scenario is interesting because it provides for growth in areas not currently covered by the plan, in the farther flung parts of the region including Norfolk and Suffolk. Some of these areas are in danger of decline under the current plan, because they are more economically and spatially remote. This scenario could help tackle rural deprivation and the position in some of the coastal towns. By developing housing across the region it could be more likely to tackle localised housing need.

Option 4 has the worst impact on the environment because of the higher build levels (higher climate change impact), higher levels of car travel associated with building away from urban centres, and more challenging waste disposal.

### **What is your preferred growth scenario and why?**

None of the above. We would prefer a growth scenario that combines elements of Scenarios 1, 3 and 4. We do not think that Scenario 2 is appropriate.

- Growth levels towards the lower end of the range seem the most likely to be achieved, and will keep the environmental impacts to a minimum (scenario 1)
- Growth in economically strong areas will set the region in a stronger position overall, and some growth in the areas around London where demand for housing is greatest and infrastructure is most developed makes sense (scenario 3)
- Growth should also be focussed in other areas of the region not currently covered by the plan. This approach is more difficult, requiring smaller numbers in more locations to be developed, and skill in ensuring that sustainable communities are

developed. However it needs to be considered for the health of the rural and more isolated areas of the region (scenario 4). It will also lift the burden of development off urban areas that are already at capacity, and the south of the region.

We would like to emphasise that although we consider that alternative areas for development should be considered, including rural areas, we do not in any way support the overdevelopment or rapid development of rural areas as the countryside and rural communities need to be protected.

**Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?**

Not enough consideration was given to the impact on communities, and the social fabric of the region. We recognise that this is a difficult aspect to measure, but feel that it is crucial for the success or failure of whichever scenario (or combination of scenarios) is taken forward.

**Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why?**

The vision and objectives are sufficiently general that no one could really disagree with them strongly. We feel that they should be tightened up, stating aspirations which are unique to the East of England. More depth and vision need to be communicated.

We feel that the order of the breakdown of objectives needs to be changed, as clearly our first priority as a region isn't around climate change (although this is crucial) but about working to create a region of strong, cohesive and sustainable communities assisted by a growing and diversifying economy.

**Do you have any evidence to suggest that policies other than those identified need to be updated or created?**

The Voluntary and Community Sector has a wide range of evidence and expertise on many of these policy areas, and we think that it is important that the review process seeks to understand and incorporate their views.

**Do you have any comments on the sub-area profiles?**

COVER as a representative of the Voluntary and Community Sector as a whole does not think it appropriate to make comments on individual sub-area profiles. Many of our members and partners will have views on these issues and may be responding separately.

**Do you have any comments on the Integrated Sustainability Appraisal. Is there any further information that should be taken into account?**

Topic Paper 4 which focuses on Community and Well-being raises some important issues. Use of the Index of Multiple Deprivation to consider the spatial distribution of deprivation is appropriate, but local information about these areas is also valuable for understanding the sustainability implications of regional development. Engagement with the third sector can be important in accessing this type of information.

One paper of note which is missing from the list of documents included in the overview is the Regional Social Strategy. Other important documents are also missing, particularly government papers which are more recent – some of those cited go back ten years now.