

GOSE RESPONSE TO CONSULTATION ON THE ON DRAFT REGIONAL SPATIAL STRATEGY FOR THE SOUTH EAST

PART A - KEY COMMENTS ON OVERALL STRATEGY AND APPROACH

Introduction

We commend the Assembly on producing draft Regional Spatial Strategy (RSS) - the South East Plan (SEP) - and acknowledge the great deal of work and expertise that the Assembly has put into the supporting background papers and technical work. The extensive and unprecedented amount of public consultation that has informed the draft is also noted. As part of this response we would like to formally thank the Assembly Members and officers for their hard work and commitment to this time consuming and difficult process.

At this stage of the RSS process we are aiming to raise issues that we think would benefit from further discussion at the Examination in Public, particularly in terms of the relationship with national policy or where the draft RSS might benefit from additional clarity and/or detail. Where we raise issues over policies it is not because we necessarily disagree or dispute the intention of the policy, rather it is to make sure that the final adopted RSS adds value to the planning system by containing distinctive, south-east specific policies that set a clear steer for the local development plan and other documents that follow. We also note areas where the links between RSS and other regional strategies might be strengthened.

We cannot under estimate the importance of the South East Plan (SEP) in terms of its national importance. It is charged with the task of reconciling competing pressures in what is a very rich region, both in terms of natural resources and economic wealth. As part of this introduction we would like to summarise some of the important features of the Region which, when managing future change, represent key challenges for RSS.

The Importance of the South East Region

- **The economy of South East England is critical to the performance of the UK as a whole:** It is the largest net contributor to the UK exchequer and in 2002 its resident workforce made the largest single contribution to the UK economy surpassing the contribution by London workers for the first time. In 2004 the South East's share of the UK total Gross Value Added (GVA) was 15.7% (only 0.7% less than London). At an estimated GVA of £158 billion, South East's total GVA is above 150% of the next largest regional economy in the UK and is larger than the economy of Denmark or Portugal. Half of the ten fastest growing sub regions in Europe are forecast to be in the wider South East, outside London. Berkshire, Buckinghamshire and Oxfordshire lead this growth.
- **It is next to one of the most dynamic cities in the world:** In 2001, 371,000 South East residents worked in London while 128,000 Londoners worked in the South East and about £15 billion of Government tax revenues in 2002 accrued from the economic linkages between the regions. Around 97,000 people have moved from London into the South East every year since 2003, and those moving in are generally higher skilled and more affluent than those already in the region.

- **It has the highest population of all the regions in England, and it is growing rapidly :** The population of the South East has grown by 38,000 people a year since 1991¹, and this rate of increase is forecast to increase to 46,000 per annum.
- **Its population is ageing rapidly:** By 2028 there will be 750,000 more people aged 65 or more than there are now.
- **Household size is getting smaller and fuelling household growth:** The ageing population, cultural changes (often supported by increasing affluence) and increase in family separation will continue to drive household growth and reduce household size. Two thirds of the demand for additional housing in the region comes from those already in the region². Seventy percent of household growth between 2006 and 2026 is estimated to come from one person households.
- **Housing has become far less affordable:** Average House prices rose by 114% in the six years since 1996/7. The figure for lower quartile housing was 135%. The average First Time Buyer Deposit in Quarter Four of 1997 was £9,658. By the fourth quarter of 2004 this figure was £43,232
- **It has rich and irreplaceable natural resources:** 60% of the region is covered by international or national level environmental designations, 35% is Green Belt or Area of Outstanding Natural Beauty, it contains 40% of the UK's heathlands and more ancient woodland than any other region.
- **The South East consumes more resources than other regions:** The South East population uses more water, gas and electricity per capita than most other regions and the region produces only 2.6% of its energy from renewable sources.
- **It produces huge amounts of waste:** The region produces over 25 million tonnes of waste per year and scraps around 330,000 vehicles a year. These figures are rising.
- **It has one of the most intensely used transport systems of any region.** The M25 is the busiest motorway in the country and the most heavily used rail routes run through the region.
- **South East people agree that it is a good place to live:** - 9 out of 10 residents in the South East rate their quality of life as fairly good or very good. Generally they are more satisfied with where they live than residents elsewhere in the country.

In managing the pressures that result from these competing factors the S E Plan must find the correct balance in meeting the needs of the region within the policy framework set out by the Government.

¹ ONS

² Draft South East Plan

Relationship to other regional strategies

We consider it important to remind the Panel of the context provided by the other regional strategies currently in place or under review in the South East. If the South East is to make the most of its potential, and to deliver on a shared and ambitious vision, it will be essential that the South East Plan both sets the agenda for the other strategies, and is consistent with them. At present section B6 makes reference to the Integrated Regional Framework, and section B10 makes reference to other policy documents including the Regional Economic Strategy, but we are not convinced that these references go far enough. The Panel may therefore wish to pursue in its examination:

- The parameters of the South East Plan in relation to other regional strategies;
- The extent to which the South East Plan is in a form which can set the agenda for those other strategies;
- The extent to which the South East Plan is consistent with existing and emerging strategies, and where it is not, either the justification for this inconsistency or how consistency might be achieved.

Process

Partial Reviews

Numerous sections of the Plan have incorporated policies and text from recent partial reviews of RPG9, with some amendments. Apart from comments on the Regional Transport Strategy below we only comment on the amendments in Part B.

Sustainability Appraisal and Appropriate Assessment

The draft RSS is accompanied by a draft Sustainability Appraisal (SA), in line with regulations and guidance. We have maintained a dialogue with the Assembly over the form and content of this Appraisal and would like to thank them and others who worked on it for its preparation. In our view the Assembly has used the appraisal process effectively to help demonstrate some of the trade-offs and issues surrounding the S E Plan. In as far as it is possible we consider that the Appraisal as fit for purpose, although we recognise that it is difficult to gauge some of the more complex effects of new development, particularly at regional level. One example would be whether new development will have a purely additional impact when compared to the baseline or whether it can be developed in a way that contributes to mitigating existing problems.

It is helpful that the Appraisal was able to draw upon agreed objectives set out in the Integrated Regional Sustainable Development Framework.

We would stress that SA is an ongoing process, and would be grateful to the Panel if they could consider the soundness of the current Sustainability Appraisal, in line with paragraph 2.5.2 of ODPM's '*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*'

If the Panel decide to recommend a significantly different strategy the Appraisal would probably need to be revisited and revised to test out the implications of any recommendations.

Confirmation of the requirement for RSS to be the subject of an Appropriate Assessment under the Habitat Directive came late in the process of preparing the S E Plan. However we understand that an Assessment is now being prepared by the Assembly and is expected to be completed before the Examination in Public.

Implementation Plan

We welcome the preparation of an Implementation Plan and recognise that it is an emerging process. there may be scope for the Regional Assembly, working with SEEDA, to develop a single implementation plan which would take forward the South East Plan and the Regional Economic Strategy in parallel. This will be important if we are to deliver a shared and consistent vision, and GOSE is prepared to assist with this process. Preparation of an implementation plan is in line with chapter 3 of PPS11, but there is no prescription in national guidance about its form or scope. We are aware that research on implementation planning has been commissioned by the English Regions Network, and is expected to report this summer. We also understand that the result of the Regional Assembly's auditing of the submitted Implementation Plan for consistency and refinement will be published in the autumn, and encourage the Panel to take account of this.

The schedules of infrastructure requirements are a useful element of the Plan which the Panel could usefully examine, focusing on the basis and criteria for identifying the infrastructure, its costing, realism and affordability and the consistency of approach between the sub regions. This would need to be justified in relation to the proposals and policies of the Plan, investment programmes and funding streams.

We note that there are a number of rail schemes in the sub regional schedules which were not included in the previous Regional Transport Strategy, and/or have not been supported by Government or the rail industry. Some of these are being considered by the Government's 'Regional Planning Assessment for the Railway' .

Further comments on the approach are set out in the transport and infrastructure section of the Part B response and we would like the opportunity to comment on the Assembly's revised Implementation Plan when it is available.

The draft Plan identifies limited responsibility for regional authorities in many policy areas.

Overall Structure and Content

One of the key tests of soundness set out in the paragraph 2.49 of the PPS11 is the extent to which the draft RSS meets the objectives identified in paragraph 1.7 of PPS11. Amongst these objectives, we would highlight the need for RSS to provide a regionally specific vision within a concise strategy, and address those regional and sub-regional issues which can not be addressed at the local level, whilst avoiding repetition of national policy.

The draft runs to 343 pages and contains more than 200 policies and suggest that the Panel should consider whether this meets the requirement to be 'concise' as set out in PPS11. For comparison the draft contains around four times the number of policies contained in the draft RSS for the North East. A document of the length of the current draft may be less clear, less accessible and more difficult to implement than should be the case for such a fundamental Plan. The Plan might benefit from being tightened, shortened and re-structured to give a real focus to the key issues for the South East, removing or relegating all duplication with national policy or with other regional strategies.

In our Part B response of policies, we refer to several examples of policies which we feel may not 'add value' to policies elsewhere. Whilst we may not disagree with the intentions of these policies we would like the S E Plan to demonstrate a clear distinction between the 'old style' RPG documents and the 'new style' RSS required by PPS11. The introduction of the 2004 PCP Act introduced a new style of regional planning document which is intended to be very different in scope and format to its predecessors. Excessive detail and descriptive material risks devaluing the purpose and usefulness of RSS by reducing clarity and accessibility or creating additional work and bureaucracy at LDF and development control level. We therefore strongly encourage the Panel to consider whether there are opportunities to reduce the amount of policies and supporting text, by identifying:

- Policies which restate national policy,
- Policies that are statements of intent only - with no spatial connection or relevance to spatial planning decision making and action,
- Policies that are replicated between the Core Strategy and the Sub Regional Chapters, and .
- Superfluous descriptive material.

Two useful questions might assist this process ;

1. Could a policy equally apply to all other regions? If so we would question whether it adds value by providing a regionally specific dimension.
2. Does the policy or text add anything to either national or local policy? If not we would question the need to create confusion and/or duplication by adding more policy or explanation.

CORE STRATEGY

We note that the sub-section 2 of the Section A summarises the contradictions that the South East Plan strategy must deal with and paragraph 5.1 of Section D3 sets this out in terms of the challenges relating to the future housing provision. We would contend that there is a risk that as formulated the draft can only compound these challenges, and would ask the Panel to explore how competing pressures can be best reconciled, in light of the following:

Approach to Economic Growth

We welcome the recognition of stable economic growth as an important objective of the draft RSS. However we question the approach adopted in the draft RSS on some key aspects that are fundamental to maintaining a stable economic growth including aiming for a sustainable balance between economic and housing growth.

As part of the debate on the economic elements of draft RSS we would welcome a closer dialogue and greater consistency between the approach of the Assembly and the approach of SEEDA, for example, as set out in the draft Regional Economic Strategy and its technical background papers. This relationship between the RES and RSS also influences the level of housing growth and its link with labour demand and supply factors referred to later in this response.

The draft RSS aims to provide for an average of 3% GVA growth for the first ten years of the Plan. It takes the position that no economic growth figure can be identified for the 2nd ten year period and any GVA rates to be planned for after 2016 will be considered as a part of the plan review process (Section B, paragraph 7.4.2 /Section C paragraph 3.3.2 to 3.3.4). This implies that the draft RSS has not set out to make provisions for any specific or indicative level of economic growth for the second half of the plan period. We would welcome clarification and testing of the draft RSS approach to economic growth based on the following types of questions :

- Does the approach adopted in the draft RSS affect the requirement to provide a clear and a long-term spatial strategy to ensure the maintenance of high and stable levels of economic growth and employment as required by the Government policy PPS11 (paragraphs 1.3 and 1.7) and PPS1 (paragraphs 26)?
- Is the draft RSS approach to economic growth the best one to take on the basis of the evidence available? Is this the best approach to handle any uncertainties about the future?
- Is it logical or internally consistent to have neither a specific nor an indicative long-term GVA target at the regional level whilst aiming for a long-term GVA target at the sub-regional level (Section E1, paragraph 2.1), despite the fact the uncertainty inherent in economic forecasts are substantially higher at the latter levels compared to the former?
- Does the draft RSS identify the appropriate targets to help measure and strive towards a sustainable balance between economic and housing growth? Should the RSS include employment growth and/or employment land/floor space as indicative economic growth targets at regional, sub-regional and local levels?

Approach to Labour Supply and Labour Demand:

The draft RSS indicates that the current mismatch between labour supply and labour demand is likely to worsen both at the regional level and in many parts of the region that are fundamental to economic vitality and competitiveness of the South East and the country as a whole. A spatial distribution of growth that sufficiently align jobs and workforce growth is also a key determinant of sustainability in transport terms. We would like the following to be tested:

- the evidence base underpinning the labour needs and supply at both regional and sub-regional levels are clear and consistent.
- the draft strategy's ability to support the economic objectives of the region and sub-regions by facilitating an adequate alignment between forecast labour needs and labour supply as facilitated through the housing policy.
- the level of alignment supported by the draft RSS spatial distribution of future growth and its implications.

Approach to the Scale of Housing Growth

The appropriate scale of housing growth is dependent on demand side factors on the one hand, and the ability and capacity of the region to accommodate new housing on the other.

Testing a Sufficient Range of Options

We have repeatedly advised the Assembly of the need to test a sufficiently wide range of options for growth, in light of increasing demand for housing. Letters from GOSE³ and from the housing minister, Keith Hill⁴, to the Assembly highlighted guidance in the current RPG9 (Policy H3 paragraph b) that evidence suggested a long term need for additional housing above currently planned levels, and the Government's stated policy in the Sustainable Communities Plan for a step change in housing supply.

We note that the selection of options for the pre-submission draft narrowed the range between the RPG9 scale and the highest option to be tested by excluding higher growth options recommended by the Assembly's officers. The officers' recommendations were based on technical evidence and presented 34,000 dwellings per annum as the mid-point of the estimated scale of housing need (32-36,000 p.a.) and the appropriate scale of growth to be tested.

Government's response to the draft therefore questioned the appropriateness of this approach and the resultant gap in the evidence base on implications of any higher levels of growth. By selecting a lower range of options at an early stage the Assembly effectively removed from public scrutiny and debate the growth levels suggested by demand side factors and the draft RSS does not test whether or how such levels of growth could be accommodated in the Region.

As the a wider range of options were not put forward for testing and discussion the Government commissioned an independent technical study⁵ to provide evidence which otherwise would not have been available for the RSS debate. This was published on 20 June 2006. This study pulls together evidence already in the public domain.

³ 8 January 2004

⁴ 25 November 2004 and 7 December 2004

⁵ Augmenting the Evidence Base for the Examination in Public into the South East Plan, Roger Tym and Partners and Land Use Consultants, June 2006

We therefore suggest that the Panel may consider testing :

- the appropriateness of the scales of growth tested by the Assembly during consultation , and
- the evidence for the need for higher levels of growth, its potential impacts and alternative spatial distributions.

Demand Side Factors - Projections and Forecasts

PPG 3 requires that the latest Government household projections are taken into account in arriving at draft RSS proposals on the amount and the broad distribution of housing provision. The 2003 based household projections, published in March 2006 indicate that the households in the region may grow by about 739,000 between 2006 and 2026 as opposed to the 606,287 indicated by the SEERA projections that underpinned the highest option consulted for the draft RSS. We note that the population and household estimates underpinning the H1 housing provision are presently unclear. However, a rough estimate, assuming a 3% vacancy rate indicates the household growth implied by H1 is 560,660 households, or lower if the 29,000 allowance to meet the housing backlog is excluded. We would suggest that the key matters that need testing should include:

- Is the demographic evidence underpinning draft RSS clear, methodologically robust and internally consistent ?
- Are the demographic projections and forecasts for Sub-Regions and Remaining County Areas sufficiently robust?
- How should the final RSS take account of the new evidence arising from the latest Government population and household projections?

Scale and Distribution of Housing Development

We would like the level and the distribution of housing provision tested to help answer following concerns:

- Does the overall provision and its spatial distribution adequately reflect the needs of the region and its constituent parts, taking account of the best available evidence on future housing demand and need, and affordability concerns?
- Is the draft RSS able to support the economic development objectives of the region and the sub-regions through an appropriate alignment between labour supply and labour demand as facilitated via housing growth?
- Is the draft RSS estimate of the backlog of housing needs and the approach to addressing it clear and effective?

- Does the scale and distribution of housing provision sufficiently reflect the vision for the growth areas and of any identified new growth points?
- Is the draft RSS assessment of key uncertainties affecting the scale of future housing needs and especially the risks associated with the possible overspill from London and the draft RSS approach to managing these risks sufficiently robust?
- Do the levels of housing growth proposed have sufficient regard to PPG3, the Government's stated objectives, as set out in the Sustainable Communities Plan, Government's response to Kate Barker's review and the draft PPS3 direction of travel, and the ambition for a speedy turnaround in affordability as advised by the ODPM⁶ in December 2005?
- Does the policy reflect the sound evidence of need for affordable and intermediate market housing and their deliverability/viability?
- Where proposed future provision of housing for a local planning authority area is lower than current planned levels, is there a clear reason why this has been changed? There appear to be a number of districts where the proposed H1 provision is lower than both the current plan provision and the past delivery rates.

Supply Side Factors

Identification and analysis of the pressures on the region in terms of economic and population growth, together with the need for more affordable housing is only one side of the coin. Equally important is the ability of the region to accommodate new growth whilst maintaining and where possible enhancing the quality of life enjoyed by current residents.

We are aware that according to some publicly available evidence there may be considerable capacity in the region for additional dwellings, and that significant amounts of additional housing over current levels could come forward in the early years of the plan. For instance, the Regional Assembly Monitoring has identified a considerable amount of housing land availability in the Region, equivalent of eight years of land with permission or allocated in plans. The Roger Tym Study⁷ estimates that this may be higher at 13 years. A summary of local authority housing trajectories, prepared as part of individual authorities' Annual Monitoring Reports, reveals that for the next five years an average of 37,938 pa dwellings are projected to be built. We also note that a high proportion of new housing (76% according to Regional Assembly figures) is currently on previously-developed land. There is however some need for caution when interpreting or applying these figures.

We would therefore suggest that the Panel consider whether:

- The evidence from capacity studies, housing market delivery capabilities and local housing trajectories has been fully taken into account in determining the level of housing proposed ?

⁶ The 'Mike Ash' letter

⁷ see 5

- The distribution of housing provision is founded on a sound assessment of best spatial options, including an assessment of alternative options that may have been identified ?
- The impact of the scale of provision and its distribution on environmental constraints and infrastructure (both social and physical) has been fully assessed and factored in?

We would also urge the Panel to give consideration to the role and the scope of the existing housing stock and the match between type of housing need (i.e. Household type / size) and supply. In doing so we would welcome an exploration of how best the RSS could be informed by the regional and national work relating to Housing Market Areas.

The South East's Relationship with Other Regions

The South East Plan cannot be looked at in isolation, and the anticipated levels of economic and housing growth will also impact on other regions. Although this is not specifically addressed in the draft Plan, One key debate is whether growth in the South East will work to the detriment of other regions, and whether it is possible to take some pressure of the region by constraining growth in the region and developing elsewhere. On this point we would highlight the English Regions Network 'Regional Futures' Study, which concluded that "*constraining growth in the South East would have a series of adverse impacts. It would fail to deliver the intended benefits to the North and Midlands, and would also cause a worsening standard of living in the south. A failure to plan for and deliver economic growth in London and the South east will progressively harm the economic potential of the UK as a whole⁸...Economic activity deterred from the south will not occur in equal volume elsewhere and will reduce tax take for spending elsewhere in the country⁹...The potential for spatial planning to redistribute economic activity from South to North is very limited...the consequences of restraint are far more likely to be higher costs, off shoring and lower standards of living in the South, than for economic growth in the north.*"¹⁰

As the draft RSS acknowledges, the South East's most important relationship is with London. However, the RSS also needs to take particular account of the inter-relationships with the East of England that constitutes the 'Greater South East' together with London and the South East, East Midland and the implications on the MKSM growth area and the growing significance of linkages between the South West and the South East.

The South East and London are closely interlinked in terms of migration, commuting, infrastructure networks, housing markets, business interactions and wealth transactions. These impact upon the two regions as a combination of inter-connected 'push' and 'pull' factors that result in significant outcomes. For instance, draft RES notes that 371,000 South East residents worked in London while 128,000 Londoners worked in the South East and about £15 billion of Government tax revenues in 2002 accrued from the

⁸ Regional Futures. Arup Associates for English Regions Network, 2004, Page 42.

⁹ Regional Futures. Arup Associates for English Regions Network, 2004, Page 78.

¹⁰ Regional Futures. Arup Associates for English Regions Network, 2004, Page 73.

economic linkages between the regions. Both South East and London are expecting jobs growth to exceed the planned housing growth by significant margins and that could have far reaching implications not only on the two regions but on the other adjoining regions and the Exchequer. Responding to these known risks and managing future uncertainties is a key challenge that must be responded to by the RSS and we would welcome examination of this matter.

Growth Areas and Growth Points

As set out in the RPG9, the principle of identifying growth areas is that concentration of development is key to a sustainable development strategy for the region. Since 2001 much has been done by the Assembly to progress the growth areas identified in the RPG9 - Milton Keynes/South Midlands and Ashford - and it was expected that draft RSS would consolidate these partial reviews and other relevant work that has taken place since 2001 into a single spatial strategy.

The Panel will also be aware that Government has introduced a 'New Growth Points' initiative, which is a key part of its response to the recommendations of the Barker Report on housing supply, *and recently announced an initial list of bids that are being considered*. It is appreciated that the draft RSS was not able to take account of potential New Growth Points, however it is our view that the initiative offers an opportunity for RSS to deliver additional economic growth and housing in a focussed way and should be seen as a helpful contribution to the discussion about the level and location of growth.

The impact of possible New Growth Points could be as follows:

1. Focusing development to these areas, within the context of the draft RSS strategy.
2. Facilitating additional economic and housing growth over and above that envisaged by the draft RSS.

We would therefore recommend that consideration should be given to a specific matter on growth areas. This should include the scale of continued expansion of the existing growth areas and the justification of potential new growth areas. Allied to this, ensuring that the location of potential new growth areas provides a coherent and sustainable part of the draft RSS will require examination.

In light of past identification of growth areas and new bids coming in for growth point status we would contend that the following typology may be emerging for settlements and strategic locations in the south east:

Firstly the existing Growth Areas of Ashford, Aylesbury, Milton Keynes and Thames Gateway (Kent Thameside) : we would like to explore whether the draft RSS has taken full account of the needs, constraints and full potential of these areas.

Second, possible New Growth Points: Government recently announced those growth points which have undergone an initial assessment and would be developed in anticipation of a further announcement in October 2006. The Panel may wish to consider how any successful bids could best be incorporated in to the RSS process, with due regard to their deliverability and sustainability.

Third, other important centres that are growing economically e.g. those referred to in the draft Regional Economic Strategy.

Fourth, areas that have significant regeneration needs and development potential that may be prove to be critical for reducing the intra-regional disparities.

In general, we would wish the EiP to test whether the draft RSS has adequately explored the need and the scope for providing strategic directions for new growth locations within the region.

Transport and Infrastructure

We note that the draft contains an important message that growth should be aligned with supporting infrastructure. We recognise the strong feeling amongst Assembly members and the wider public on this issue, and agree that the relationship between growth and infrastructure is a key issue for the RSS.

We support work to identify the infrastructure requirements of the proposals in draft RSS, but remain concerned that the approach used is over simplistic and, in some cases appears to treat the provision of new infrastructure as the direct and proportional result or requirement of growth. We consider that the relationship between growth and infrastructure is more complicated and interdependent, with both variations in the supply and demand for infrastructure potentially influencing patterns of growth.

The approach of draft RSS varies with the type of infrastructure being considered. For example managed reduction of demand is considered a prime factor in waste, minerals, energy and water policies, but not to the forefront in transport policies. The Panel may wish to consider whether adequate consideration has been given to the potential for demand management, making better use of existing infrastructure and better planning in reducing transport infrastructure requirements. It is also not apparent that the levels and distribution of housing are based on a consistent or adequate consideration of spare or easily enhanced infrastructure capacity, accepting that this is not the only consideration. In particular the constraints on providing new transport infrastructure (environmental and financial) can be expected to impact on the scale and distribution of housing growth. This is the case along much of the south coast, whereas in many other areas capacity in existing systems is sufficient to accommodate additional loadings generated by new housing.

The extent to which the infrastructure identified in the plan seeks to address current deficiencies or relates to new development is unclear. This poses a question about the realism of the proposals in financial and conceptual terms – if there is an implied objective of achieving zero backlog.

Given that we do not have evidence from modelling a housing distribution designed to minimise infrastructure costs we do not know whether an acceptable housing distribution with lower infrastructure costs than proposed is feasible

The key point is that infrastructure affordability has not been adequately fed into the process and needs to be tested at the EiP. For example, could a strategy which built on supporting development in areas of high demand, in association with demand management and high levels of developer funded infrastructure, achieve many of the planned objectives within a lower public cost framework? We would of course expect that the case for providing additional infrastructure to be credible only if it is based on clear evidence of need.

The key issue we would draw the Panel's attention to here, and would encourage the Panel to consider, is the robustness of the relationships in the Plan between housing numbers and distribution, and transport management, planning, and infrastructure provision.

Other transport issues we would suggest for the Panel to consider are whether:

- the proposed minimal changes in Section D4 to the RTS, published in July 2004, are adequate in the light of the many concurrent and subsequent developments in transport policy which are not fully captured (Future of Transport White Paper, Future of Air Transport White Paper, Future of Rail White Paper, Managing Our Roads, Road Pricing Feasibility Study, Regional Funding Allocations, Ports Policy Review, Walking and Cycling Strategy etc). Perhaps the most pertinent are the firmer indications of government resources to the South East as set out in the Regional Funding Allocations, the clearer line on Road User Charging, and the Air Transport White Paper.
- the Implementation Plan is acceptable given current omissions of costs and timescales and the inclusion of very local interventions. Also whether it would benefit from explicit links being made between proposed interventions and delivery of the RSS objectives/major developments and whether interventions should be prioritised.
- RTS objectives would benefit from being recast to be more regionally specific and hierarchical, and related more clearly to a summary of the evidence base underpinning identified problems, giving a clear explanation of the link between problems and the strategy's objectives and policies.
- RTS conforms with the Air Transport White Paper, particularly with regard to the safeguarding of land necessary for the wide spaced runway option at Gatwick airport.
- the draft Plan has given due consideration to affordability (this links both to the need to consider the potential impact of demand management, making better use of existing infrastructure, and the need to prioritise interventions).

We also suggest that the Panel might consider expanding the RTS to include;

- a clearer, more positive and more spatially specific policy on road user charging,
- a map and policies related to the national strategic transport networks, providing a clear indication of strategic hierarchy, and
- greater specificity about the location of inter-modal freight interchanges.

These points are developed in more detail in our Part B response to Policy CC5.

Health

We support the principle of the 'healthy region' set out in the vision on page 28. The overall health status of the region is strong relative to other parts of England, but when compared to many of our European neighbours our performance is less favourable. Regional averages also conceal the presence of pervasive and entrenched inequalities in health which have an adverse impact on the lives and potential of significant numbers of people, young and old, in the South East. Economic prosperity is a pre-requisite for good health, but it is vital that all sections of society have an opportunity to share equally in this and that growth is not achieved at the expense of a further increase in economic and health inequalities. We would therefore urge the Panel to consider how the plan can develop this vision.

Crime

We are concerned that the draft Plan contains little explicit discussion of, or provision for, the community safety agenda. This is in contrast to its discussion of deprivation, health, education and cultural issues. Whilst these are often good proxies for the state of crime, disorder and substance misuse within an area, the Plan will be imbalanced if it does not address the community safety agenda directly. Indeed, the provisions of the Crime & Disorder Act (1998) require (under Section 17) the majority of the agencies who will be implementing the Plan to consider the community safety implications of all of the policies that they make. We would welcome the Panel's consideration of how community safety issues can be woven through all of its chapters and policies, and integrated as part of the spatial planning process. We note that the Integrated Regional Framework (IRF) objective 6 is to reduce crime and the fear of crime and that this provides essential context for the SE Plan.

Specific areas where the Plan can contribute to this agenda are set out in our Part B response.

Climate Change and Sustainable Development.

This is clearly a major issue for the Plan, as it influences the level and pattern of development over the next twenty years. We therefore support the Assembly's recognition of, and work in this area. We would also point out that Section 39 of the 2004 Planning and Compulsory Purchase Act requires RPBs to exercise their function with the objectives of contributing to sustainable development. We would therefore expect RSS to address:

- The implications of the latest climate change scenarios and regional climate change studies in order to assess risk;
- The need to avoid major new development in areas that are likely to be at greater risk or are likely to be increasingly vulnerable in the future (for example those in areas of significant flood risk or where water resources are limited);
- The physical and environmental constraints on development of land, including, for example, how the issues of contamination, stability and subsidence, erosion and flood risks may alter with climate change, and the effects on biodiversity and nationally or internationally designated sites;

- The need to consider possible adaptation options for vulnerable areas.

We note that there is an over arching policy on climate change, but as our Part B response suggests, we feel there needs to be additional consideration of the role of the plan in combating climate change.

Town Centres

The Plan's contribution to identifying and supporting town centres is valuable, and the supporting work is acknowledged. We are however concerned over the selection of some centres, and would question whether some of the policies set out provide a south east specific context. This is developed in our Part B response.

Water Resource Issues

We note the Assembly's conclusions on both the supply and demand for water, water quality and treatment issues, demand management and the proposals for additional supply resources. We would particularly like to commend the partnership working approach that led to technical studies being undertaken on these issues and some seminal work has been produced as a result. Infrastructure for water supply and treatment is a key consideration for any growth strategy, particularly as an element of infrastructure funding as referred to above, and this is currently generating an enhanced level of public concern, particularly in the South East. We would welcome comprehensive consideration of this matter at the Examination in Public and an opportunity to bring together the regulators, utilities and other agencies with responsibility for water resources to produce a clear understanding and a way forward for RSS.

SUB REGIONS

Detailed comments on the sub regions are picked in up Part B of our response. As a general comment we would state that there appears to be a considerable overlap of policy content between the core strategy and the sub regional sections and a lack of sub-regional specificity in a number of sub-regional policies making these appearing superfluous. We also note that the draft RSS has adopted different approaches to strategy formulation in different sub-regions (i.e. Employment targets and employment land policies) and at times this has also lead to inconsistencies between approach adopted in the core strategy and those of the sub-regional strategies (i.e. approach to economic growth). We would ask the Panel to consider

- whether the Draft RSS is internally consistent, and
- how the plan can be consolidated into a more concise strategy while enhancing regional and sub-regional specificity.