

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

**PART B – DETAILED COMMENTS**

	<b>POLICY/SECTION</b>	<b>ISSUES</b>
	<b>SECTION A CHALLENGES</b>	
	Section A – Challenges	We broadly support the draft RSS interpretation of the overall task, issues and challenges and the plan parameters and principles as set out in Section A. The overall vision of a healthy region that prioritises well-being, prosperity, and sustainability appears a good one
	<b>SECTION B – CONTEXT</b>	
	Paragraph 4.2	<p>The significance of London to both the economic and housing needs of the South East is evident, unique and universally acknowledged. The draft RSS notes the challenging nature of the task faced by the London Plan in increasing the housing provision to 30,000 homes p.a.</p> <p>However, the statement "The London Plan's housing provision has been increased to 30,000 dwellings per annum and this represents a major step change in provision, although this will be difficult to achieve" is out of date. The Mayor has proposed in his housing alteration that the minimum homes target in the London Plan be increased to 30,650 homes per year, subject to public examination in June. For context, current housing output is 27,364 homes (in 2004/5). We would, therefore, question the assertion that "provided.....that levels of international migration do not significantly exceed current forecasts and London achieves its increased level of housing, London's physical demands on the South East until 2021 look reasonably stable." (Section B 4.2). The Panel may wish to test whether the draft RSS is able to manage this key area of uncertainty in an effective manner.</p>
	Sub- Section 7 – Scales of Change and Forecasts	Our serious concerns on this aspect of the draft RSS have been explained in Part A of the representations. We look to the Panel to advise on this matter in the light of these concerns.
	Sub Section 7.3/4	We would welcome consideration by the Panel of the approach to making provisions for economic growth and ensuring a sustainable balance between employment and housing growth. Please see our detailed

		comments on Part A.
	<b>SECTION C</b>	
	Paragraph 2.1	We would advise that the draft would benefit from reference to the <b>Regional Rural Delivery Framework (RRDF)</b> as a key supporting document, with a cross reference in several places, not least at section 2.1 (Statement of Policies) where there is no mention of rural priorities. Other sections that should reflect the RRDF are <b>D1, D2, D5 and D7</b> .
	Paragraph 3.2.6	Consultation Options - Please see our representations in Part A.
	Paragraph 3.3. 2– Agreed Scale of Development	<p>Agreed scale of Development - Please also see our representations in Part A.</p> <p>Paragraph 3.3.2 states that all the considerations of need, impacts and delivery have been taken into account in arriving at the growth level of 28,900 dwellings p.a. We strongly question this and invite the Panel to test whether this has been done.</p> <p><b>Backlog of unmet housing needs</b></p> <p>The backlog of unmet housing need that exist at the beginning of the plan period is a key component of total housing need. Paragraph 3.3.2 states that the Assembly “wishes to see early progress being made in eliminating or reducing the backlog” and the “Assembly will monitor progress and the development achieved annually against that required for the backlog to be eliminated over the first 10 years of the Plan”.</p> <p>We would ask the Panel to question how this is achieved. Taken literally this would mean a provision of 2,900 p.a. to address the backlog during the ten year to 2016 and consequently just 26,000 dwellings per year to accommodate future household growth during the same period. Is this the case? If not what is the target against which the Assembly wish to monitor the elimination of backlog? If it is done in the absence of a target, is it really capable of being monitored?.</p> <p>Please also see our representation on backlog at Section 1.5 of Section D3 (Housing).</p>
	Paragraph 3.3.3 to 3.3.4	<p><b>Interrelationship between housing development and economic needs</b></p> <p>We support the draft RSS affirmation that the relationship between economic growth and housing are of critical importance. However we suggest that the Panel address whether the levels of housing provision is in line with, or has any relationship with the forecast economic needs of the region, and of parts of the</p>

		<p>region.</p> <p>Please also see out representations to Section B - Paragraph 7.4.2</p>
	Page 36-37	<p>Under Sustainability Appraisal the RSS refers to the UK Strategy as 'A Better Quality of Life'. This has been replaced by "Securing the Future" which is the current UK SD Strategy, published in March 2005</p>
	Table C3, Page 34	<p>We support the general thrust of the draft RSS rationale for the spatial distribution of housing growth.</p> <p>However, we would welcome testing at the EiP of the appropriateness of the methodology and the scale of the sub-regional housing figures, and of the figures for the 'rest of' the sub-regional areas. In testing these we invite the Panel to consider:</p> <ul style="list-style-type: none"> <li>• The demographic evidence</li> <li>• Economic objectives of the region, sub-regions and districts</li> <li>• Robustness of the housing capacity estimates.</li> <li>• Alignment between sub-regional, housing market area boundaries and the deliverability implications resulting from it, and</li> <li>• Appropriateness and implications of very low housing provision proposed for some of the areas outside 'sub-regions'</li> </ul> <p>We would also invite the Panel to explore whether the housing distribution set out in Table C3 is suitable and deliverable. The Panel will be aware that there has historically been a shortfall in housing provision compared against current RPG9 levels. Although this is improving, the improvement does not appear to be due to improved delivery across the board. We would therefore like to stress that the deliverability of new housing growth is of the utmost importance, and it is the role of the RSS to make sure that, at a strategic level, new housing development is either free from or is capable of overcoming any constraints to delivery.</p> <p>Please also see our comments in Part A on proposed levels of housing compared with RPG 9</p>
	Paragraphs 5.1-5.6. 2	<p>Our comments on Sustainability Appraisal are set out in Part A of our response.</p>

3	Section D1 -CROSS CUTTING POLICIES	
	CC1 – Sustainable Development	This overarching policy is very much supported. We particularly welcome the recognition of health within this policy as health and sustainability are inextricably linked.
	CC2/1.5 - Climate Change	<p>We agree with the importance of climate change and recognise that the RSS has a key role in helping tackle the issue. We are particularly pleased that it is treated as a cross cutting policy and given a high profile in the document. Given the significance of climate change, we are keen to make sure the actions and policies set out are easily understood and implemented.</p> <p>The Panel will be aware of the Department of Communities and Local Government's recent announcement of its intention to develop a Planning Policy Statement (PPS) on climate change. Some of the headline objectives for a PPS on Climate Change were set out by Yvette Cooper in her speech at an event hosted by the Green Alliance on 17th May. These objectives provide a framework for consideration of the provisions in the draft South East Plan and associated Implementation plan on climate change, particularly in terms of the way in which they make clear that the new PPS will focus on ensuring sustainable development. The PPS will also make clear that the location of new development should support the reduction of carbon emissions, through for example ensuring mixed development and reducing the need to travel, and show how the planning system can be used to deliver renewable, and more sustainable, forms of energy. This will include encouraging more fuel-efficient technologies such as combined heat and power as well as micro-generation.</p> <p>A key consideration for the PPS is ensuring that we have an efficient and effective planning system whose policies do not have the unwanted practical effects of introducing new complexities to the planning system which could have a perverse effect on our overarching aim of sustainable development. The issue is whether the planning system could prove a blunt and bureaucratic tool in achieving climate change objectives when better alternative may be available. The Plan should not duplicate or repeat national policies and programmes that may be better suited to tackling the problem. One obvious example would be Building Regulations. We will advise the Panel on progress on the new PPS at the Examination.</p> <p>Whilst the high-level policy direction is to be welcomed we are concerned that there do seem to be some gaps between the policies which are outlined and the description of how these are to be delivered and by whom, raising the question of what the practical implications of these policies are. This is an area where further clarification is needed and is something which merits further discussion.</p> <p>We also note that the draft sets out a climate change target. Any regional CO2 target would need to be agreed to by key regional partners, and would urge the Panel to take views at the Examination in Public.</p>
	CC3/1.7 – Resource Use	This policy appears to be directed at the Regional Assembly and then goes on to outline a range of measures that are outside the scope of the plan. It is also not clear on what 'complementary legislation' is required. We support the

		<p>intentions of the policy, but as it appears to be a statement of intent rather than a policy giving clear direction we question its value.</p>
	<p>CC4/1.8 – Sustainable Construction</p>	<p>Whilst we agree with the intentions of the policy and understand the importance of the need for mitigation of the effects of new housing we would question how it will be implemented. For example, is the development control system expected to assess whether Building Regulation standards are exceeded? In addition, what should Local Development Documents include to help implement this policy? Are Local Authority planners expected to recommend refusal of planning applications that don't exceed Regulations or apply whole life costing principles? And to what extent to schemes have to exceed Building Regulations to meet the requirements of this policy.</p> <p>The Panel will be aware that the Department of Communities and Local Government are due to issue the Code for Sustainable Homes later this year and we would have expected to see some reference to this key document here. The relationship between the final version of this Code and this policy will need careful exploration to avoid potential overlap.</p> <p>Finally, we note that this policy overlaps with policy EN1 as both refer to BREEM standards. We would encourage avoidance of duplicating policy content in different parts of the Plan.</p>
	<p>CC5 – Infrastructure &amp; Implementation</p>	<p>We fully agree that it is important to secure the timely provision of infrastructure. Discussions between the Assembly and Ministers have reaffirmed the Government's commitment to make sure that growth is underpinned by adequate levels of supporting infrastructure. Part A contains an overview of the points we would like to raise about this policy.</p> <p>Our concerns stem not from the intention but from the fact that the policy addresses the infrastructure issue in such a generic manner. In particular:</p> <ul style="list-style-type: none"> <li>a) It fails to acknowledge that there may be scope for making better use of existing infrastructure or for managing demand. We do not support the assumption that only new infrastructure can create additional capacity.</li> <li>b) The notion of growth being 'conditional' of infrastructure ignores the fact that RSS can influence investment as well as respond to it.</li> <li>c) Not all new development will automatically lead to increased demand for all types of infrastructure. There is no indication of how this might be factored into the analysis of spatial options. For example, demand for local education facilities depends on the population structure rather than household numbers, and the location of growth may reduce the need to travel rather than increasing it.</li> <li>d) The policy refers to a concordat. Whilst we welcome the principle of an agreed statement on infrastructure the government cannot make binding long term commitments over the whole life of an RSS. The concordat that has not been agreed or signed and is not a planning document.</li> <li>e) At (ii) the wording is not clear and we question what is the purpose of making references to LDDs "broad cast and timing of their provision."</li> <li>f) Regarding (iii) this criteria appears to be unnecessary and possibly open to misinterpretation. Conditional</li> </ul>

		<p>planning approval currently ensures that development cannot take place without the necessary infrastructure being secured. So it is unclear how this policy is to be interpreted without undermining the role of the infrastructure delivery agents, who will be better placed to view the deliverability of necessary infrastructure than the Local Planning Authority.</p> <p>The policy also sets out the expectations of the Assembly and will need rephrasing before publication of the final version.</p> <p>On a wider point, we would also ask whether the need for community safety infrastructure has been considered. This will cover the frontline criminal justice agencies such as the police, probation, prisons and courts plus the broader support agencies such as drug treatment services.</p>
	Paragraph 1.12	This is out of date – it is descriptive of a process of the transfer of NHS land to English Partnership and we would suggest deletion.
	Paragraph 1.13	The premise that MOD reviews <u>will</u> lead to the release of <u>significant</u> amounts of land will need testing.
	CC6 - Use of Public Land	<p>We acknowledge that it may be useful to have an overarching statement about the contribution of public land to development in the region, and that there are considerable opportunities for the use of public land in the region to contribute to the overall goal of more sustainable development. However, we feel the policy requires more careful thought and may be better articulated through explanatory text or the Implementation Framework, rather than expressed as a generic policy.</p> <p>Firstly, we would question the need for a policy as no evidence has been forthcoming to suggest that these reviews do not already happen. In its current form the policy merely refers to the collaborative working required between the Regional Assembly and public bodies. We would welcome clarification of the proposal for an overall “disposal implementation and management strategy” to be agreed between the Regional Assembly and public bodies, in particular over its status, who would be expected to be party to such a strategy and what might be considered a site “of regional significance” suitable for inclusion. Furthermore we would point out that there may be circumstances where national disposal programmes are sensitive (for example carrying security implications or financial disclosure limitations) that mean that the Assembly cannot be party to discussions.</p> <p>We would suggest a policy, if needed, would be better to state that when land has been declared surplus, Government departments and other public landowners should ensure that it is included in Local Development Schemes and Local Development Frameworks at the earliest stage possible. When disposing of surplus land, Government departments and other public landowners should then maximise the amount of land available for affordable housing and the Regional Housing Board should prioritise such schemes in determining its forward funding programmes. The price at which this land is made available is a key factor in the operation of this process.</p>
	CC7 – Inter Regional Connectivity	Whilst welcoming the strengthened references to inter-regional working throughout the Plan this policy appears to be a mere listing of neighbouring regions with whom the Assembly intends to have dialogue. The outcome this policy is intended to achieve is unclear. We would suggest that this should be deleted, reduced to text or that cross boundary

	issues are outlined elsewhere.
CC8a – Urban Focus and Urban Renaissance	<p>Urban renaissance provides an important opportunity to tackle deprivation and inequalities and the intention of the policy is therefore supported. However, we would question whether this policy adds much to what is set out in national policy.</p> <p>The Panel will wish to explore sub paragraph ii which sets out a 60% brownfield target, in line with national policy (which sets a 60% target to 2008) in light of past performance and planned growth levels. The target could be said to not seem challenging given that nationally and regionally this target has been exceeded.</p> <p>The Panel may also wish to consider the role of smaller market towns that are important urban service centres to the surrounding countryside and villages, and whether this is adequately reflected in the draft Plan. We would also ask how is the plan recognising the problems rural communities have with access to community safety services (and vice versa), such as access to drug treatment or court services.</p>
CC8b & c – Regional Hubs	Canterbury and Tonbridge/Tunbridge were transport interchanges and we consider these as reasonable additions as hubs. Hastings is also a reasonable addition given the regeneration impetus and the need to improve access. High Wycombe is less obviously justified, given that it is not a main transport interchange, and its inclusion would be an appropriate consideration for the Panel.
CC9 – Intra – Regional Disparities	This policy does not address pockets of rural deprivation that are a real issue for communities across the region
CC10a – Green Belts	This policy implies that no changes will need to be made to Green Belt boundaries in the region. However, the Panel for the Examination in Public into the Deposit Draft Oxfordshire Structure Plan implied the need for appraising an option involving the selective release of Green Belt land around Oxford, as part of a full appraisal of all spatial options through the South East Plan process. It would therefore be useful if the Pane could question the need for selective review of Green Belt boundaries while recognising the Government's commitment to increasing the area in Green Belt overall. This issue is also pertinent to Policy CO3.

<p>CC10b/1.33-1.38 – Strategic and local Gaps</p>	<p>Whilst we can appreciate the need and desire to maintain the separate identity of settlements and avoid unnecessary coalescence, we do not consider the approach set out in draft RSS is the right way to achieve such an objective. In particular we would question whether the use of blanket designations is a 'blunt tool' that is out of step with a more positive approach to planning. The purpose of the new system of local development frameworks is to deliver sustainable development through proactive spatial planning rather than through a reactive process that relies on rules and local designations.</p> <p>Paragraphs 24 to 25 of PPS7 (Sustainable Development in Rural Areas) advise that carefully drafted criteria based policies in Local Development Documents should provide sufficient protection for landscapes that are locally valued and that local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection.</p> <p>We consider that local designations, if inappropriately drawn up without regard to development needs, could undermine the proper consideration of national guidance in the selection of broad locations for development and the definition of site boundaries. For example, paragraphs 8 &amp; 9 of PPS7 address the requirements of PPG3: Housing in a rural context, and Policy H3 of draft the RSS echoes this policy. There is a possibility that land for development will be needed in or adjoining existing villages to meet the needs of local people. If such areas have been covered by a local designation, it will make it all the more difficult to meet local needs in a sustainable way.</p> <p>In addition, once provision has been made for necessary development (housing, employment, community facilities etc) through Development Plan Documents and allocated sites have been shown on proposals maps, the protection afforded to open countryside by national guidance should be sufficient to address the need for development to support the rural economy (for example see PPS7 for example paragraphs 15 &amp; 16).</p> <p>We would also like to explore whether the settlement threshold of 10,000 population in the draft policy take adequate note of the fact that settlements of a particular size may have a different significance in different parts of the South East.</p>
<p>CC11 – Supporting an ageing population</p>	<p>We welcome this policy given the importance of this issue for the future of the South East. Policy CC11 could also cover the need to facilitate older smaller households to move out of large family dwellings to more manageable smaller places by, say, providing adequate smaller bungalows/flats etc in areas of need. We would wish the Panel to explore evidence including that from the Assembly's recent work on the use of the existing stock, to understand the needs and opportunities stemming from this.</p>
<p>CC12 – Character of the Environment &amp; Quality of Life.</p>	<p>The sentiment of this policy is not one that we would question, but we would ask whether this policy meets PPS11 tests, in particular whether it is specific to South East and adds anything beyond policy set out both nationally and locally.</p>



4	SECTION D2 - ECONOMY	
	<p>General – links between nature and scale of service based growth and housing growth and distribution.</p>	<p>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.</p> <p>Please see the representation on Section B, paragraph 7.3/4.</p> <p>We support the draft Plan’s intention to bring economically inactive people into employment. However, we note that the paragraph 1.23 (ii) mentions a possibility of bringing a maximum of 265,000 economically inactive people in to labour market and agree with the acknowledgement that it is ‘unlikely to be achieved’. Such a target is very ambitious and would require significant improvements in areas with lowest activity rates and especially on making substantial improvements in skills levels. We would therefore be cautious about the scope of such an objective in realistically reducing the need for additional labour to support economic growth.</p>
	Paragraph 1.5-1.17	<p>The demographic base underpinning economic forecasts referred to here are not transparent and appear to be different from that is supported by the H1 housing provision.</p>
	Paragraphs 1.20-1.23	<p>We would invite the Panel to explore the concept of 'smart growth' and its applicability to the region, and its constituent parts, as the draft RSS is not sufficiently clear on this valuable concept. Some of the figures used may lead to unintended miss-interpretation. The discussion in paragraphs 1.20 – 1.23 does not indicate how the draft RSS intends to apply smart growth policies. We therefore invite the Panel to seek clarification on the meaning, the relevance and the application of Smart Growth within the region. We note that Policy WCBV5 contains guidance on Smart Growth which could usefully be referred to.</p>
	RE2 Employment and Land Provision	<p>DCLG guidance on Employment Land Reviews states that employment land reviews should be an integral part of the preparation of Regional Spatial Strategies, and that RSS needs to assess the needs for and availability of strategic sites.</p> <p>Neither the draft RSS policy nor the supporting text include any clear advice or information on the scale of need of employment land provision, and how this policy is intended to operate is unclear. Policy RE2 appears to be repeating the national policy / guidance. We question whether the policy RE2 is regionally specific or adds value in terms of providing clear guidance to LPAs. The policy could also be slimmed down. For example, criteria (i) &amp; (vi) could form a single point, or remain as two provided there is a distinction between movement of people and freight which is not currently present. Similarly criterion (iii) seems to repeat (ii).</p> <p>We would welcome Panel's advice on indicative economic / employment targets (Please see Part A)</p>

		<p>While we welcome a policy supporting agriculture and other sectors of the rural economy and rural economic diversification, we would argue that it is insufficient to mention “clearly defined criteria” without either identifying or referring to potential sources of those criteria.</p> <p>On criterion (iv), while we recognising the need to focus on urban areas, appropriately scaled, designed and sited rural sites can be very important to supporting development of access to jobs in rural areas and support for new and start-up small and medium enterprises. We would also suggest that the term “premises” could be removed as the Local Authority will only be able to allocate sites as part of Local Development Documents, and will not be in a position to directly provide premises.</p>
	RE3 – Human Resource Development	We welcome the inclusion of a policy relating to skills requirements in the region, including the need for sufficient and accessible premises for adult skills and learning.
	RE4 – ICT and Changing Working Practices	Some additional clarity on how LDDs and LTPs positively enable and promote ICT would be welcome.
	RE5 – Intra-Regional Disparities.	The third bullet of criterion (i) appears to duplicate policy RE4.

5	SECTION D3 - HOUSING	
	General	<p>In part A we have set out our concerns about the preferred option included in the draft.</p> <p>At this point we would reinforce the point that there is no clear evidence presented as to how the overall figure of 28,900 was arrived at. There is also no evidence as to how the backlog of need mention in section 1.5 has been factored in.</p> <p>We welcome consideration by the Panel and advice on the matters raised in Part A relating to these issues.</p>
	Paragraph 1.4.2	<p>The figure of 71% mentioned in is now out of date. It is currently 76% at 2004/5 (Source: Regional Assembly Monitoring).</p>
	Section 1.5 - Backlog	<p>Please see our representation on Section C paragraph 3.3.</p> <p>The draft RSS estimate of the backlog is 29,000 households at 2001. We invite the Panel to test this further and to explore whether the number has been changed between 2001 and the beginning of the plan period (2006).</p>
	Paragraph 1.5.3	<p>It might be helpful to for the Panel to be clear about the link between these figures and</p> <ul style="list-style-type: none"> <li>(a) the number of homeless households in temporary accommodation and</li> <li>(b) households on LA housing registers.</li> </ul>
	Paragraph 1.7 - Type of Housing	<p>Providing the right type of housing is a key challenge. We consider that any policy response to pressures for additional housing in the region will need to be informed by an understanding of the types of household in need, their aspirations and ability to afford accommodation, to look further than a simple 'numbers debate'. We also support identification of ageing population and smaller households as the key challenging trends. We support the inclusion of a Cross cutting policy (CC11) on the ageing population (please refer to our representations on Policies CC11 and H6)</p> <p>We note that the demographic data given in the draft RSS needs updating now to reflect new data from latest government projections.</p> <p>We welcome the Draft RSS's focus on the changing balance between family housing and flats as we are aware of concerns relating to this relationship. The Panel might wish to explore best available evidence on this so ascertain whether the region is at risk of creating a mismatch between types of housing need and supply and how the RSS can help to achieve a sustainable balance. The Panel may wish to examine any evidence on the aspirations of new households, their ability to afford additional space and whether there is a spatial dimension to the need for different types of housing (for example smaller units in urban centres).</p>

	<p>Paragraph 1.8 – Existing Stock</p>	<p>We welcome the recognition of the vacant stock as an important source of additional housing supply and we support the draft RSS's call for focus on local hot spots with high vacancy rates. In particular, we would stress the importance of reducing long term vacancies in the housing stock.</p> <p>However, we note that the vacancy rate in the South East is 2.7%. This, we assume, would indicate that there is little scope for offsetting the scale of housing provision to take account of vacant dwellings coming back to occupation. The regional vacancy rate of 2.7% may indicate the general tightness of the market. As we understand, it is generally accepted that a frictional rate of about 3% is needed to maintain the smooth functioning of the housing market and the management of social housing stock. As Map H5 demonstrates parts of the region have areas with very low rates of less than 2%, which may be indicative of a housing market that is too tight. We look forward to Panel's advice on the issue.</p>
	<p>1.9.2 to 4 – Housing Market Areas</p>	<p>We would suggest that the issue of the relationship between the 21 HMAs and the 9 sub-regions proposed should be discussed at examination.</p>
	<p>Policy H1 – Housing Provision</p>	<p>Our serious concerns on this aspect of the draft RSS have been explained in Part A of the representations. We look to the Panel to advise on this matter in the light of these concerns (please see Part A)</p> <p>As the New Forest National Park Authority (NFNPA) has assumed full planning responsibilities since April 2006, the H1 provision for New Forest District (NFDC) should now be disaggregated between the NFNPA and NFDC. This is in line with PPS7, paragraph 21 that requires that in nationally designated areas comprising National Parks, .....”where appropriate, RSS, should also support suitably located and designed development necessary to facilitate the economic and social well-being of these designated areas and their communities, including the provision of adequate housing to meet identified local needs”.</p>
	<p>Policy H2 – Housing Delivery</p>	<p>We support any moves to make sure that new housing development is delivered in a timely way. The Panel will be aware that following past shortfalls in housing supply, GOSE has agreed action plans with key authorities and worked with them to ensure housing is being delivered against past rates.</p> <p>We are however unconvinced that the Housing Delivery Action Plans will add any value for many authorities to the new system of Local Development Frameworks that will operate within the RSS timescale. Work on current GOSE action plans began before the introduction of this new system. Whilst we would expect that there be some value in individually tailored plans for particular authorities and sites, we are nervous about introducing a new and potentially onerous additional requirement for plans for local authorities.</p> <p>We would expect Local Development Documents to consider phasing issues against infrastructure and housing trajectories to set out the anticipated pattern of supply. Annual Monitoring Reports are also required to set out actions to be taken if policies are not being implemented as expected. Furthermore the concept of local brownfield</p>

	strategies set out in draft PPS3 may also overlap with these Plans.
Policy H3 – Location of Housing	<p>We have already questioned in relation to Policy CC7 whether the “at least 60%” target is sufficiently challenging, especially as monitoring seems to suggest that an increasing proportion of development is on previously developed land and through the conversion of existing buildings. We question whether this target is also sufficiently challenging in relation to current housing figures.</p> <p>The fourth paragraph of this policy leaves unclear whether or not “sustainable locations” are primarily defined in terms of accessibility by public transport, or whether other factors also apply. We would expect a wider definition of sustainability. For example, development which leads to less high quality agricultural land would also cause us concern.</p>
H4 - Affordable Housing	<p>This policy refers to a regional target of 25% social rented and 10% other affordable housing, to be developed in more detail informed by the results of local housing needs assessments and implemented through local development documents. We support the intention and are pleased to see the clear reference to the need for local housing assessments to inform the setting of local targets. We would however question:</p> <ol style="list-style-type: none"> <li>1) Whether ‘comprehensive policy’ on financial viability can be set. We would suggest this is rephrased to highlight that local level affordable housing policies need to take viability into account.</li> <li>2) The value of setting a regional target based on needs assessment. This seems to us only one side of the equation, with overall supply, grant and viability being on the other.</li> </ol> <p>We agree that there is a role for a regional target, but there is also a need for sufficient flexibility as the local levels of affordable housing will be dependent on market conditions and availability of grant.</p> <p>We also note that the draft highlights, in numerous places, the need for significant increases in affordable housing delivery in the region. It is noted that the draft seems to treat affordable housing and market housing as separate elements and does not recognise the relationship between the two. For example, we understand that the research underpinning the figures of 25/10% social/intermediate split may stem from an identification of households in current or forecast need. It would seem evident to us that one way of increasing the supply of affordable housing in the region to help address the needs of these households would be to increase the overall amount of all form of housing, so that the amount of affordable housing delivered through planning gain can be proportionately increased.</p>
H6 – Type & Size of New Housing	<p>Please see our comments on paragraph 1.7.</p> <p>Whilst drawing the attention of the Panel to the approach to mix set out in draft PPS3 we would question whether this policy adds anything in additional to national policy guidance.</p>
Sub Section 9 Gypsies & Travellers	<p>We note that the Regional Assembly have agreed to undertake a partial review on this issue, but as yet there is no published timetable.</p>

6	SECTION D4 - COMMUNICATIONS & TRANSPORT	
	General	<p>There is little difference between the transport section and the Regional Transport Strategy (RTS) published by the First Secretary of State in July 2004. A significant exception is a new reference to the potential for communications technology.</p> <p>We are concerned that so little has changed, because much has changed since the Examination in Public into the Regional Transport Strategy in November 2003. For example, the Traffic Management Act, the Aviation and Transport White Papers, the Government's line on congestion charging, the consultation on 'Making Better Decisions', Local Transport Plan 2 and Accessibility Planning guidance, and Regional Funding Allocations. Whilst we recognise that this RTS was developed recently it retains its original characteristics of support for the strategy in current RPG9, rather than being obviously aligned with this new strategy</p> <p>The emphasis in this section on managing and then investing is sound but appears incompatible with other references in the draft Plan which refer exclusively to infrastructure investment as the means of responding to demand.</p> <p>In essence the Plan appears to have been developed 'bottom up', through the development of sub-regional strategies, and an opportunity has perhaps been lost to provide more of a strategic overview.</p> <p>In particular the national and international strategic context, which was separately set out in Table 7 of the RTS, and in policy T17 and map 3, is lacking. This is particularly notable in terms of plans for strategic routes such as crossrail/M25/A34 which would have significant impacts on accessibility across the region and which the Panel may view as unhelpful omissions. It would be helpful to relate the national strategic context to problem identification, which is currently limited to textual comment about economic success, pockets of deprivation, unreliable journey times and the gateway role. Maps or text defining the most congested or inaccessible parts of the road and rail network would be useful.</p> <p>Within the sub-regional sections there is little evidence to justify the transport proposals outlined. The investment frameworks of the RTS, which were a list of well understood projects, have become a list of interventions which are not clearly related to the spatial strategy and which have a great deal of information missing.</p> <p>Given these previous concerns and the importance of the infrastructure/demand management/plan-for-less debate. we hope that transport will be a matter of interest to the Panel, particularly regarding the scale of demand management and the affordability of transport infrastructure, which has not been clearly considered in arriving at the Plan statements about inadequate infrastructure, or in the inclusion of dubiously justified schemes.</p> <p>The key areas we have suggested might benefit from investigation by the Panel are set out in part A. In summary</p>

	<p>they are ;</p> <ul style="list-style-type: none"> <li>• Whether the RTS objectives are sufficiently regionally specific?</li> <li>• The role of demand management (pricing, smarter choices), possibly including the identification of areas where demand management might be appropriate and/or how it might be further investigated</li> <li>• Whether the list of schemes is incomplete (particularly in terms of costings, timings etc.)</li> <li>• Whether all of the schemes identified are of regional/sub-regional significance (local schemes should not be considered in RSS)</li> <li>• Whether there needs to be prioritisation of schemes</li> <li>• Whether proposed schemes are affordable</li> <li>• Whether the Air Transport White Paper has been referred to and taken account of appropriately.</li> </ul>
T3 – Regional Hubs	<p>It was acknowledged at the Public Examination into the current RTS that greater clarity was required as to the priorities, characteristics, land use and transport implications of a hub, interchange and gateway. Consideration should be given to deletions, additions, corrections to the hubs and the spokes in map T2 p 97. RTS consultation suggestions included additional spokes such as A40 west Oxfordshire, Maidstone to Tonbridge link. Dover to Ramsgate, and Aylesbury to Oxford.</p>
T4 – Communications Technology	<p>This new policy is probably of little value as it is unspecific as to who is required to encourage and consider communication technology, because it is unclear whether the ‘communications technology’ referred to, is merely that technology which is used to improve traffic information or also technology which enables audio-visual interactions between people in different places, and because in certain circumstances communications technology may produce less predictable travel behaviour rather than less travel.</p>
T5 – Mobility Management	<p>There is now some confusion over the terms mobility management and smarter travel choices and it would be more understandable to the wider audience to change this title to Smarter Travel Choices. For clarity Policy T5 v could be reworded in terms of the quality of "both" pedestrian and cycle routes to avoid any implication that this refers to joint routes only.</p>
T6 - Charging	<p>This policy adds little to national policy, is very weak, and in any event should refer to Traffic rather than Transport authorities. As explained elsewhere the panel should consider how charging might affect the scale of investment and the delivery of growth. Given the general manage and invest policy thrust we would seek a more positive statement from the Plan, ideally with a degree of locational and topic specificity</p>
Paragraphs 1.21 & 1.22	<p>This section would benefit from a direct reference to cycle parking at rail stations. This would support government policy of increasing cycle parking at rail stations .</p>

	T9 - Airports	<p>The Air Transport White Paper is government policy and should be treated as a fixed input to the RSS. As such the implications of alternative scenarios for south east capacity at Heathrow and Gatwick are legitimate considerations for the Plan. The Project for the Sustainable Development of Heathrow has yet to report, at which point the evidence base for alterations to the RSS will improve.</p> <p>The current draft Plan puts much emphasis on Kent International Airport (Manston) as being an airport of regional significance. However, the Air Transport White Paper (ATWP) puts no special emphasis on Manston and also supports growth at other SE airports, including Farnborough, Shoreham and Lydd. The Panel may wish to consider the justification for this choice of emphasis.</p>
	Paragraphs 1.25 & 1.26	<p>We are aware of the Assembly's concerns, as set out in these paragraphs. The White Paper underwent extensive consultation and was underpinned by substantial research. A challenge to government policy is not an appropriate inclusion in a Regional Spatial Strategy that will, in due course, be adopted by the Secretary of State as her policy for the Region.</p>
	T10 – Ports and Short Shore Shipping	<p>The Ports Policy Review (referenced at paragraph 1.30) is likely to be complete in the first half of 2007.</p>
	Map T1	<p>Oxford to Milton Keynes has been added to this map as an international and inter-regional corridor. This route was excluded ( along with the southern coastal route) from the International and Inter-Regional corridors map in the final version of the 2004 RTS and we see no reason to change that decision as this route is not of the same importance as the others (for example the M25, M2/A2, M23, M4, A34). We would ask the Panel to question its conclusion , particularly when considering the case for including the A303 and A31 as strategic interregional routes.</p>



7	SECTION D5 - SUSTAINABLE NATURAL RESOURCE MANAGEMENT	
	Section 2 – Environmental Challenges	<p>We note that there are several direct or indirect references to soil resource use/functionality in the Plan e.g:</p> <ul style="list-style-type: none"> <li>• Contaminated soils/remediation and soil recycling (Waste section)</li> <li>• soil functionality, in relation to SUDS (Box NRM1, p 115)</li> <li>• protection of soil quality (Rural White Paper reference)</li> <li>• Restoration and after-care/use of waste management (principally landfill) sites (policy W14) and mineral workings (paragraph 22.3, p 165)</li> </ul> <p>We also note that the Sustainability Appraisal (non technical summary) does include soil in its assessment of the likely significant effects of the Plan on the environment. However it states difficulty in identifying soils data sources with sufficient detail for a detailed assessment of the Plan’s implications for regional soil resources; it makes reference to the Defra/Rural Development Service BMV maps, which provide strategic (at 1:250,000 scale) ALC information.</p> <p>However we note that there is no specific policy or indication of how soil quality may have influenced the spatial distribution of new development in the draft. The importance of soil quality/protection and the sustainable use of soil are identified in PPSs 1, 7 and 11; the England Soil Action Plan; the national Sustainable Development Strategy; and the EU Thematic Strategies for Protection of Soil (and the future/eventual Soil Framework Directive).</p> <p>There is now also an LGA soils guidance to LAs (<a href="http://www.lga.gov.uk/Documents/Publication/greeningsoil.pdf">www.lga.gov.uk/Documents/Publication/greeningsoil.pdf</a>) and DCLG &amp; Defra are currently preparing a soils toolkit for Regional Assemblies and local planners.</p>
	Policy NRM1 – Water Resources & Management	<p>Whilst the policy contains a useful summary of what local authorities should deliver, we question:</p> <ol style="list-style-type: none"> <li>a) why the policy refers only to Local Development Documents and no other regional and local strategies.</li> <li>b) whether it would be possible to provide more spatially specific guidance.</li> <li>c) whether it is reasonable to “require” development to incorporate sustainable drainage solutions irrespective of economic viability.</li> </ol> <p>There is a reference to the former agri-environment schemes, Countryside Stewardship and Environmentally Sensitive Area Scheme. The wording will need amending, as both these schemes are being subsumed in to the higher level scheme of the (new) Environmental Stewardship Scheme.</p>
	NRM2 – Strategic Water Resources Development	<p>We would ask whether the consideration of water resources includes inter-regional factors. Paragraph 4.2, page 110 is clear some water resources are of inter-regional significance, providing water resources to London, but does Policy NRM2 include London interests to 2026?</p>

NRM3 – Sustainable Flood Risk Management	We would ask whether this policy adds value beyond national planning guidance. Indeed by paraphrasing national policy (particular that set out in PPS25) we are concerned that it may cause confusion for users of the development plan.
NRM4 - Biodiversity	This policy provides a summary of policy advice available in PPS9. In the absence of spatially specific advice about each of this topic we would question the need for the policy. One possible way of making this policy more south east specific would be to expand criterion (vi) to support a strategy to take pressure arising from new development off specific Special Protection Areas by creating new accessible green space.
NRM5 Woodlands	Given the extensive woodland resources in the South East we welcome specific policy recognition. However, we wonder how this really adds to national guidance in PPS9: Biodiversity and Geological Conservation, for example paragraphs 4 & 5 that advise on the role of local development frameworks and paragraphs 10 & 11 that advise on ancient woodland and other important natural habitats.
NRM6 – Coastal Management	There is a small mention of Heritage Coasts in the coastal section (paragraph 8.2) but this doesn't find its way into the policy. We feel that the issue of Heritage Coasts could be made more prominent in the RSS, preferably with a specific policy relating to the South East. For example, areas could be listed and the implications for those parts of the south east designated as Heritage Coast indicated. Similarly, reference is made to Estuary Management plans and Coastal Habitat Management Plans. To make this regionally specific, consideration should be given to stating the implications for those areas included in management plans.
Paragraph 8.3	This makes reference to traditional coastal defence practices inappropriate as the sole tool of risk management. It is not clear if areas of the south east should consider “managed retreat” as stated in PPG20 (paragraph 2.19).
Paragraph 8.7	Reference is made to Coastal Zone Management (CZM). This reference to CZM does not appear to add to the application of policy NRM6 and is an example of background material that could be removed or placed elsewhere.
Paragraph 9.1	This states that guidance on development control and planning for air quality is provided in advice published by the National Society for Clean Air. Clarification is required. It is not clear why the NCSA has been singled out for inclusion within the SE Plan. PPG23 “Pollution Control, Air and Water Quality” contains advice on development control. Annex 1, paragraph 1.11. This states that an action plan can be integrated within the local transport plan, where transport is a primary factor for the designation of the AQMA.
NRM7 – Air Quality	The policy and accompanying text do not appear to be regionally specific. Reference is made to 17 AQMAs. Has consideration been given to listing and/or indicating the AQMAs on a diagram or map? We understand that there are around 27 local authorities have declared Air Quality Management Area/s in the SE Region. These include local authorities within the South Hampshire, Sussex Coast, East Kent and Ashford, Kent Thames Gateway, London Fringe, Western Corridor and Blackwater Valley, Central Oxfordshire, and Milton Keynes and Aylesbury Vale sub-regions.
NRM8 - Noise	The Panel are asked to consider what value is this policy is adding, beyond national policy in PPG24 and existing legislation.
EN1-EN6 – Renewable Energy	These policies have been subject to recent review. As the draft is now being looked at in its entirety we would comment that this section of the chapter still contains a large amount of background material, and that there is an element of duplication between Policies CC4 and EN1.

8	SECTION D6 - WASTE & MINERALS	
	General	These policies have recently been updated through a partial review, the final version of which is expected to be published at around the same time as the closing date for consultation on this draft. We welcome the Assembly's progress towards apportioning waste to be managed, particularly the waste imported from London.
	Policy W3 – Regional Self-Sufficiency	The Panel may like to be aware that the East of England Regional Assembly have commissioned Jacobs-Babtie to undertake a similar apportionment of London's waste exports for the East of England, which, subject to the Panel's recommendations on the East of England Plan are likely to be incorporated in Proposed Changes to the draft plan. Co-ordination of the South East, East and London approaches to the management of waste is vital. This is particularly the case for hazardous waste. The Halcrow work on behalf of the Environment Agency is likely to indicate a significant need for hazardous waste landfill arising from Thames Gateway, for which London has no capacity. Reference to this work should be made and thought given to how the results could be incorporated into the South East Plan.
	Policy W15 – Hazardous Waste	This policy does not give any indication of the scale of need (except in terms of what are presumably annual landfill figures for oil and asbestos quoted in paragraph 16.7), and gives minimal guidance as to how this might be met. The policy begins to identify the need for facilities to deal with particular types of hazardous waste but, with the exception of landfill for hazardous waste where there is a little more clarity, it stops short of identifying the broad locations where regionally and sub-regionally significant facilities should be accommodated as required by PPS10. Without this, it is difficult to see how the WPAs will get the clarity they need to inform the development of their local waste development documents. The latter point also applies to policy W 10.
	Policy M2	The apportionment of recycled and secondary aggregates to MPAs has been agreed informally through the RAWP subsequent to the publication of the Secretary of State's Proposed Changes to the Regional Waste and Minerals Strategies. It would therefore benefit from the scrutiny of the Panel and testing at the examination.

9	SECTION D7 - COUNTRYSIDE & LANDSCAPE MANAGEMENT	
	Policy C1a – New Forest National Park	<p>We note that Policy C1a gives ‘high priority’ to the New Forest National Park, whereas Policy C2 gives only ‘priority’ to AONBs. We are unclear on the reason for this distinction given that National Parks and AONBs are of equal landscape value.</p> <p>As the first part of the policy attempts to reflect national guidance it is not clear what additional value this element of the policy provides.</p>
	Policy C1b – South Downs	<p>Policy C1b remains unchanged from the earlier draft and simply states that until a decision is made on the question of a South Downs National Park, AONB policy should apply to areas currently designated as AONBs. There is no consideration of the need to provide some sort of interim protection to the 16% of the proposed National Park that is not currently protected by AONB designation.</p>
	Policy C2 – Areas of Outstanding Natural Beauty	<p>We would question whether this policy serves any useful function given that it replicates national policy in PPS7.</p>
	Policy C3iii – Landscape & Countryside Management	<p>This policy appears to duplicate national policy. For example criterion iii entirely replicates advice in paragraph 6(v) in PPS7.</p>

10	SECTION D8 - MANAGEMENT OF BUILT & HISTORIC ENVIRONMENT	
	BE1 - Management of an Urban renaissance & BE2 - Urban and Suburban Intensification	Both policies refer to programmes and plans for managing change either at urban or neighbourhood level. While the first refers to principles, the second seems to identify possible planning tools. It could be possible to combine these two policies and refer to Local Development Documents (LDDs) rather than Area Action Plans or another, to provide flexibility for Local Planning Authorities to chose a suitable approach.
	BE3 - Suburban Renewal	<p>We welcome the references to Neighbourhood Management approaches and the importance of design. This section may provide a good opportunity to identify key considerations of good design and relevant regional or local sources of good practice, ranging from issues of density to the responsibility for designing out crime. Authorities have a statutory duty to incorporate crime prevention as part of all of their functions, including planning functions.</p> <p>We would question why the policies are framed in relation to local authorities and no other bodies.</p>
	Box BE1	The reference to PPS1 should read “Delivering Sustainable Development”.
	BE4 – Urban Fringe	Whilst we welcome the reference to the importance of positive management of the rural urban fringe we are not clear on how LDFs will bring about the land use functions described in BE4 and Box BE2, and feel this may need further clarification. It could also be helpful to refer also to other mechanisms than LDDs, such as agri-environment schemes.
	BE5 – Small Market Towns/Village Management/Historic Environment	We would question whether this policy anything to national guidance. The policy also overlaps with policy H4 in relation to affordable housing in rural areas. As a way forward the concept of Market Town Healthchecks should specifically be mentioned as the recognised and robust tool for local needs assessment and action planning.
	Policy BE6 – Village Management	We question whether the policy could provide more spatial detail. In addition, it is not clear as to where ‘rigorous design and sustainability criteria’ are sourced from, or how such criteria could be created.

11	Section D9 - TOWN CENTRES	
	General	<p>We have two main concerns over this chapter.</p> <p>Firstly, the overall the plan is not very clear in setting a vision and strategy for growth and development. It lists two types of centre, primary and secondary, and sets out the sub-regions, but is not very specific as to how this should translate into action for the authorities concerned, or the extent of growth at each location. PPS6 advises that RSS should “make strategic choices about those centres of regional and, where appropriate, sub-regional significance: - where major growth should be encouraged.” The Plan should also be based on an assessment of the need for comparison retail, leisure and office development for five-year periods within the plan period.</p> <p>Secondly, we are concerned that there is some conflict with existing national policy as set out in PPS6 in relation to out-of-centre development and that the policies fail to give adequate steer to local authorities about where growth should be directed.</p> <p>We would also question whether the Plan is putting sufficient emphasis on the need for town centres to have coherent day- and night-time development plans that place an emphasis on the need to reduce community safety problems within town centres and on routes of travel into/out of town centres.</p> <p>Finally, there appears to be sections of background text that could be removed or moved the annexes. Examples would include paragraphs 1.1 and 1.2, 1.12 – 1.16, and paragraphs 1.40 and 1.43, paragraphs 1.47, 1.5.1 and 1.56.</p>
	Paragraph 1.5	<p>This paragraph isn’t clear as to whether any further growth should be directed towards the larger centres, or if it is only to be directed at middle and lower order centres? The sentence “local centres are likely to be a focal point for some, but not all development...” is imprecise. Alternatively it could be rephrased to read “of appropriate scale to local centres”</p>
	Paragraph 1.9	<p>This refers to regional hubs supporting urban renaissance and urban communities. It could also usefully refer to rural centres and rural transport.</p>
	Paragraph 1.19	<p>PPS6 does not support the sale of bulky goods from out of centre locations as this paragraph suggests. We would suggest that it could be rephrased to suggest that conditions should seek to prevent a proposal changing into a form which would not have been initially permitted. New controls on mezzanine floorspace were also introduced in April 2006, so the reference to mezzanines is not necessary.</p>
	Paragraphs 1.40 & 1.41	<p>The wording “local planning authorities subject to major developments of their area/centres” is not clear and could be rephrased along the lines of those ‘who have identified need for major developments’, which is more in line with the nature of the plan – led system. The last sentence of 1.41 is also unclear. PPS6 asks all Local Planning Authorities to assess the need for main town centre uses, and to allocate sites accordingly, in accordance with the sequential approach.</p>
	Policy TC1 – Development of	<p>It is encouraging to see that PPS6 has fed through to this draft plan in terms of the intention to distribute growth to</p>

	Town Centres	middle and lower order centres, avoiding over-concentration of growth in the highest order centres, to achieve an even distribution of facilities and meet needs locally. However, we advise against repeating national policy; it would be preferable to point out that policies in PPS6 apply, especially now that the final version has been issued.
	Policy TC2 – Strategic Network of Town Centres	<p>We have a number of general concerns about the ‘Provisional List of Town Centres’:</p> <ol style="list-style-type: none"> <li>a) There is currently no differentiation between different town centres. We would expect more of a hierarchy rather than a list. For example, regional hubs might be expected to play a more prominent role. PPS6 advises that RSS should make clear strategic choices about where growth should or should not be encouraged.</li> <li>b) There is no guidance as to the scale of development that might be expected or even on what basis local authorities might determine this at a later stage. While we would not expect details for every centre, we would expect some steer as to where major activity and development is likely to take place.</li> <li>c) Paragraph 1.14 about the sequential approach section advises that development should be appropriate to the centre’s role in the network; however policy TC2 provides no relevant information about the respective roles of individual town centres.</li> <li>d) The policy states that changes to the strategic network of town centres <i>can</i> be made through revisions to RSS. However, we would be surprised if they were not made through revisions to RSS.</li> </ol> <p>Judging by paragraph 1.18, the Assembly have assessed need at about 4m sq metres gross up to 2026. We would ideally like to see an indication in the plan of the scale of growth envisaged in the major centres. To illustrate whilst one would not necessarily expect to see in RSS, detailed growth figures for areas such as Epsom or Farnham, guideline figures for the likes of Milton Keynes, Ashford, Portsmouth, Southampton, Reading, Guildford could be expected.</p> <p>We have a particular concern about the inclusion of Bluewater in the list as we are unconvinced that Bluewater performs the function of a town centre. In our view, it is an out-of-town retail development. As such, it should not be the focus for major additional developments or uses, which attract large numbers of people, especially as paragraph 1.16 of the draft consultation Plan states that no need has been identified for large-scale extensions to existing out-of-centre or sub-regional shopping centres up to 2026.</p> <p>Paragraph 1.30 also indicates that limited additional floorspace should be permitted at Bluewater. We are not clear that the need for additional floorspace, as required by PPS6 paragraph 2.14, has been identified. Paragraph 1.4 also refers to both Bluewater and Lakeside as if they are town centres, which we do not consider them to be.</p>
	Paragraph 1.19	This paragraph contains a conflict with PPS6 in that it lumps town centre and edge-of-centre locations in together. Residual expenditure should be directed towards town centres first, then edge-of-centre locations. Paragraph 1.19 also states that it will need to be demonstrated that new retail warehousing will not have an adverse impact on the vitality and viability of neighbouring and local centres. This could have the effect of diluting policy, as PPS6 does not limit impact assessments just to warehousing.
	Policy TC3 – New	Policy TC3 contains unnecessary repetition of national policy in PPS6 and could be considered for deletion.

	Development and Redevelopment in Town Centres	
	Para 1.40/41	Paragraphs 1.40 and 1.41 seem to suggest that local authorities need only assess the capacity of their centres to accommodate additional development if they are subject to 'major developments'. PPS6 does not limit capacity assessments in this way so this is a further dilution of PPS6. The text should therefore be deleted.
	Policy TC4 – Creating and Supporting Town Centres	<p>Although the first sentence of this policy should be retained, the second and third could be deleted as they add nothing beyond what is already contained in PPS6. The policy also seems to contradict the approach to new growth at Bluewater.</p> <p>We are also concerned by the suggestion that “where there are no sequentially suitable sites, upgrading an existing out-of-centre sites should be considered”. This appears to conflict with national policy insofar as it fails to reflect the full sequential approach, which includes requiring retailers and others to be flexible in looking at more central locations.</p>



12	SECTION D10 - TOURISM & RELATED SPORT & RECREATION	
		<p>We would remind the Panel that these policies have been recently revised. However, since this time London has been confirmed as the winning city for the 2012 Olympics. Implications will flow from events being held within the region and the spin-off effects of the likely influx of visitors to the region.</p> <p>Again, we would ask the Panel to consider whether economies can be made in the length of this chapter.</p>
13	SECTION D11 - SOCIAL, CLUTURAL AND HEALTH DIMENSIONS	
	Paragraph 3.3	<p>This states it is important to give a “sharper focus of resources and effort in a limited number of priority areas.” But other than mentioning seven rural priority areas, this section does not attempt to give more direction/ set out which areas where there should be a particular focus.</p>
	Policy S1 – Social Inclusion	<p>We welcome this attempt to provide a framework for social, cultural and health dimensions, which is consistent with Government’s commitment to Social Inclusion. We wonder whether it would be helpful to make more explicit reference to ‘community cohesion’ and also to the need to engage local communities in decision-making.</p> <p>We would however comment that the content and indeed the language itself, is of a very general nature. It is worth considering whether or not more specific and spatial content is feasible. For example, are the factors/issues significantly different in an area of high deprivation surrounded by prosperity (as in Slough in the Thames Valley) to one that is surrounded are also deprived (as in Hastings and Medway towns). Effective work is very likely to require partnerships with local communities and other organisations. The statement that this should only take place ‘where necessary’ should be deleted.</p>
	Policy S2 – Whole life costing	<p>We would question whether this an issue specific to the South East, and if not, why it requires a policy in the plan. Please see our response to Policy CC11.</p>
	Policy S3/S4 – Supporting Healthy Communities/Heath Services	<p>We support the sentiments underpinning this policy as the planning system is a major influence on the environmental determinants of health behaviours such as physical activity and road traffic injuries.</p>
	Policy S4 – Promoting Sustainable Health Services	<p>We would however question the value of Policy S4. Is there any evidence to suggest that this is not already happening?</p>
	Policy S5 – Education & Skills	<p>The analysis in this section is accurate but superficial in its policy implications. The Policy appears to do no more than restate basic statutory responsibilities. Consideration might be given to further some of the key policies from Every child matters; the Youth Green Paper, the schools white paper and some elements of the policies on respect and social cohesion – for example, developing better vocational and work based learning; making schools the hub of community activities; federations and clusters of schools collaborating together to share good practice and</p>

		improve standards; the involvement of business and higher education as partners in developing and improving schools.
	Policy S6 - Higher & Further Education	The educational agenda which is alluded to in S6 needs to be strengthened – it is rather better developed in some sub regional plans for instance page 244 South Hampshire – perhaps the way forward is stipulating that each sub regional plan needs to express vision to enlarge and enrich educational opportunities in some way or other.
	S7 – Cultural & Sporting Activity	This policy appears to largely duplicate policy in PPG17 and its companion document, which advocates that facilities should, in priority order, be accessible, then of appropriate quality, and then of appropriate quantity.
	S8 – Community Infrastructure.	This policy appears to be a statement of Intent rather than a policy and we would ask if it could be sharpened or removed. If it is to be retained we would suggest that the work of the voluntary sector could be recognised in this policy.

14	Section E - SUB REGIONAL AREAS (PART2)	<p>General comments relating to all sub-regions and the draft RSS sub-regional approach</p> <p>Our key strategic concerns that are indicated in Part A of our representations are also relevant to sub-regional parts of the draft RSS and we wish to draw Panel’s attention to these concerns. We are not expressing our support or objection at this stage to housing allocations for individual sub-regions or districts. Instead we would like to raise the following concerns:</p> <ol style="list-style-type: none"> <li>1. Alignment between economic/employment and housing growth at sub-regional and district levels.</li> <li>2. Lack of sub-regional specificity in a number of policies.</li> <li>3. Whether the sub-regions and districts are likely to meet the housing provision in the light of the Draft RSS approach to constrain the housing delivery to the success in delivering infrastructure. On this we would like to draw the attention of the Panel to paragraph 4.9 of PPS12: Local Development Frameworks that advises that local planning authorities should ensure that the delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. We would also wish to direct the Panel to our comments on infrastructure in Part A and against policy CC5.</li> <li>4. Inconsistent approach across sub-regions to phasing housing development.</li> <li>5. Appropriateness of the provisions for the settlements including market towns in the ‘rest of the sub-region’ parts of the region.</li> <li>6. Inconsistencies in key demographic and economic evidence (forecasts) referred to in the draft RSS.</li> </ol>
	Overview	<p>We note that paragraph 1.8 refers to work being in progress and which will be developed during the consultation on the Plan.</p>
	<b>E1: SOUTH HAMPSHIRE</b>	
	Paragraph 2.1	<p>South Hampshire sub-regional strategy has adopted an economic growth target of 3.5% G.V.A per annum by 2026. We draw the attention of the Panel to the lack of support given to this sub-regional objective by the draft RSS stance of refusing to have any clarity about the regional economic/ employment growth objectives beyond 2016 especially in the light of the fact that SH1 indicates the sub-regional strategy to be lead by economic growth and urban</p>

	regeneration. (See our comments on Part A and on section D2- Economy on this)
Paragraph 2.2	This identifies the sub-regional strategy as “one of conditional managed growth”. Please see our representations on this approach in Section E – general comments
Paragraph 2.8 & 2.9 + Policy SH3	Strategic Gaps are identified and potential local gaps are referred to. We would refer the Panel to our comments on policy CC10b and paragraph 1.33 to 1.38.
Paragraph 2.10	This states that the Hampshire County Structure Plan will remain active until 2008, when the South East plan is adopted. However, according to PPS12 (PPS12 paragraph 5.8), Structure Plans already adopted on commencement of the Act are saved only for a three period, unless during that period revisions of the RSS are published by the Secretary of State or the Secretary of State directs that the three year period should be extended (PPS12 paragraph 5.8)
Policy SH2 – Strategic Development Areas and Policy SH3 – Sub Regional Gaps, Paragraph 2.9	Whilst we support the notion of preventing coalescence of settlements we would question whether the second part of policy SH2, Policy SH3 and Paragraph 2.9 is the best means of achieving it. We would direct the Panel to our response to policy CC10b for details.
Policies SH4 and SH11 – Implementation Agency	SH4 refer to an implementation Agency and SH11 to a delivery agency. Are they one and the same? Should they be in the supporting text rather than in the wording of a policy? It is not clear what the status these agencies would have, what their powers would be. This risk of an additional administrative element in this important sub regional area will also need careful consideration.  Both policies seem to have failed to add any value to the Draft RSS and they are better suited for supporting text.
Policy SH5 – Plan, Monitor and Manage	We are unclear as to what this policy adds to national guidance, which directs local authorities to carry out the process described in this policy.
Policy SH6 – Scale, Location and Type of Employment Development.	We are concerned that the policy, as currently worded, may undermine the PPS6 particularly in its application to office uses. PPS6 (paragraph 1.8) states that it applies to town centre uses such as offices. The sequential approach should therefore be applied as set out in PPS6 (paragraph 2.44) in that the first choice should be the centre, then edge of centre and then out of centre. We suggest that the policy be clarified and amended as required.
Policy SH8 – Office Development	Policy SH8 indicates that LDDs will allocate sites for large office developments if they have planning permission, are allocated in local plans, or, are in or on the edge of Portsmouth or Southampton city centres. The policy as written suggests that large allocations in local plans or sites with planning permission would be automatically included within new LDDs and not be subject to the tests set out in PPS6.  It is not clear whether office development sites with planning permission have been treated somewhat different to the employment sites. Have the extant allocations been already reviewed? Does the policy conflict with PPG3 paragraph 42 a as amended?

POLICY SH9 - Skills	The policy appears to be repeating the proposals in RES. Can this be made more sub-regionally specific?
Policy SH10 – Sub-regional Transport Strategy	<p>Investment in ferry services, as such, is not in general regarded as appropriate for public sector entities to engage in, as they should be capable of competing on an unsubsidised commercial basis with any alternative modes.</p> <p>We would also encourage the South Hampshire Authorities to establish what the traffic problem is in their area before settling on a road pricing solution.</p>
Paragraph 2.30	A delivery agency will not be able to introduce a road pricing scheme as intimated by the text to the Policy SH11. This power lies with the Local Traffic Authority.
Policy SH14 – Environmental Sustainability	Much of this policy appears to duplicate policy set out elsewhere in the draft, most notably policies on energy efficiency, coastal zone management and recycling. We would therefore question its value. Please also see comments on policies CC4, NRM6 and W2
<b>E2: SUSSEX COAST</b>	
General	<p>Context: 1.2.i refers to high levels of multiple deprivation.- the plan could recognise that for B&amp;H the wards with significant levels of deprivation co-exist with affluent wards and that the city's economic success as a regional / national tourist &amp; leisure centre, financial services &amp; creative industries centre etc needs to be maintained and fully exploited to the advantage of pockets of deprivation in the area.</p> <p>Questions pertinent to the testing of the strategy set out for this sub region could include:</p> <ul style="list-style-type: none"> <li>• Whether there is the right balance of emphasis between all the towns in the coastal zone, without undue emphasis on some (e.g. Brighton, Hastings) at the expense of others (e.g. Worthing).</li> <li>• Whether there is sufficient provision for encouraging new employment in the coastal towns of West Sussex, where economic buoyancy is relatively low, and the RES aims to promote more high skilled and technology-dependent industries.</li> <li>• How far the new housing or employment distribution for the coastal zone in West Sussex depends on the implementation of improvements to the A27 trunk road, and what are the implications if the road programme is delayed.</li> <li>• Whether the potential for additional new housing has been fully explored in those areas that are yet to deliver the strategic development committed by the approved West Sussex Structure Plan.</li> <li>• Is the scale of growth (housing, employment and infrastructure) deliverable and can be sustainably accommodated within the environmental constraints.</li> </ul>
Paragraph 1.3	The analysis of demographic trends or the sub-regional policies does not appear to give adequate emphasis on the issue of ageing population that will have significant implications on the sub-regions needs and aspirations.

	Paragraph 2.3	Does the scale of housing provision match up to the statement that “the Sussex Coast also needs to make provision for future housing development – both to address its own needs for affordable housing and help meet wider regional demand”?
	Policy SCT1 (core sub-regional strategy)-	This seems too general to be considered a specific policy - what is unique about this policy in relation the Sussex coast?
	Policy SCT2 – Enabling Economic Regeneration	We recognise the needs of the sub region, we do not see how this would work in practice. We would also question whether the draft plan is the best place to ask for additional prioritisation of investment, given that other national and regional mechanisms will assess and coordinate decision making. There is no indication in the Plan as to where additional funding would be reduced elsewhere to compensate, should budgets remain the same across the region.
	Policy SCT3 – Management of Existing Sites and Premises	We are concerned about an approach whereby all existing and allocated employment sites are retained rather than released for other uses unless it can be proved that they are incapable of meeting the needs of business, as this appears contrary to advice set out in current PPG3 updates (replacement paragraph 42 (a)). Draft RSS it self has highlighted that some parts of the sub-region have employment allocations that appear to be undeliverable (paragraph 1.3 and 4.1 to 4.3). Employment Land review Guidance advises a more sophisticated and an evidence base approach that involves all key stakeholders (RDA as well as RPB) to decisions on employment land than the policy has demonstrated. Criterion (i) of Policy SCT3 should be deleted and reliance should be placed instead on national guidance in PPG3: Housing, as amended and supported by an up to date employment land review. It may be helpful to note the more sophisticated approach adopted in South Hampshire (Policy SH7) which demands a review of employments sites, rather than a presumption that sites will be protected from change of use. The draft RSS does not indicate whether any evidence based decisions have been taken to identify key and strategic employment sites that needs special protection and support. It would be helpful if the any evidence to this effect is explored.
	Policy SCT4 – Employment Priority in Land Allocations	We have some misgivings about Policy SCT4 if implementation would lead to office and retail type uses on out of town sites, for example close to new or improved road links and dual carriageways etc. Such an approach would be contrary to guidance in PPS6: Planning for Town Centres and PPG13: Transport. How does this policy address PPG13, paragraphs 32 to 36? How does it address PPS6, paragraphs 2.39 (forecasting future employment levels) and 2.44 to 2.47 (the sequential approach)?
	Policy SCT5 – Education of Skills	Whilst we agree with the policy this does appear to be a statement of intent which also duplicates policy RE3.
	Co-ordinated leadership: para 7.1  7.2:	Re: the business community perceptions of the region- Is this negative perception true of the whole sub-region? i.e. does it apply equally to B&H. This will have an impact on the relative success of economic regeneration strategies within the region (i.e. will Hastings always be at a disadvantage?)  The plan could be more specific in the benefit to an authority such as B&H in working in co-operation other than with its immediate neighbours, as this is not immediately apparent (why would they want to 'give up' inward investment)? The benefits of joint marketing will only work if housing availability / transport routes are balanced between areas.

		For example, enabling residents to take advantage of lower housing costs outside B&H with improved east / west travel links so they can commute to jobs in B&H and environs.
	Policy SCT6:	Could the plan be more specific on the opportunities at Shoreham Harbour and specifically how it will contribute to housing and economic needs of the region?
	Housing distribution: 8.4	Is the sub-regional strategy flexible enough to meet the identified needs of the area? Does the Plan provide sufficient guidance and support to the development of key sites/areas such as Shoreham Harbour so that they can make their full contribution?
	Policy SCT 7: Broad Amount and Distribution of Future Housing	Housing numbers and the conditional approach to development - Please see our general comments under Section E
	Policy SCT8 - Affordable Housing  9.2	<p>We look to Panel to advise us on whether a 40% AH target is appropriate in the light of deliverability in terms of opportunities to maximise planning gain, the economic aspirations for the sub-region and the appropriate the desirable housing mix. For instance, should the policy make specific reference to key worker housing needs that would be important to regeneration and economic growth objectives for the Sussex Coast?</p> <p>B&amp;H has already adopted a 40% AF housing policy for all developments above 10 units. But could the plan consider the mix of dwellings within the region. i.e in B&amp;H most large scale housing development is 1/2 bed flats. Is this based on robust evidence of need in longer term and how will the need for move-on family accommodation be met within the region?</p>
	Policy SCT9 - Infrastructure  Infrastructure: 10.3	<p>We are not convinced that this policy adds value to the Plan, as it describes a process that should happen in any event. Paragraph 4.9 of PPS12: Local Development Frameworks already advises that local planning authorities should ensure that the delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources.</p> <p>Very general! But could the plan recommend a sub-regional approach to infrastructure requirements such as waste management? Although East Sussex / B&amp;H have adopted a joint waste plan, it was not without difficulty and transfer of waste between authorities remains locally contentious. This will also be relevant to domestic water supplies and</p>

		waste water etc.
	<b>E3: EAST KENT &amp; ASHFORD</b>	
	Paragraphs 2.2. – 2.5	It is not clear whether the strategy has resorted to restrict possible growth at Dover, so as to ensure that other urban areas in the sub-region receive sufficient housing to meet their needs, but maintain the overall sub-regional target. We would like the Panel to explore whether there is to be an appropriate level of growth at Dover to support the regeneration of the town.
	Policy EKA1 – Amount and Distribution of Housing	There is no explanation of why the 2006-2016 housing figure for Thanet is 1,000 dwellings less than in the Kent and Medway Structure Plan (which is close to adoption).  Panel may wish to explore the rationale for the substantial reduction in housing provision proposed for Canterbury to be examined at the EiP. This also appears to be at odds with the role of the town as a regional hub .  The last paragraph seems unduly negative (Please see our general remarks under Section E). The Ashford RPG9 amendment (which has been incorporated, unchanged, into the SE Plan) already has a policy regarding infrastructure provision.
	Policy EKA2 – Affordable Housing	We would question the relationship between this policy and policy H4, particularly in terms of whether it is needed in its present form and how the advice on the split between social and intermediate housing mentioned in policy H4 will be handled in East Kent and Ashford.
	Policy EKA 4 – Urban Renaissance of the Coastal Towns	Although expansion of Kent International Airport (Manston) is mentioned the development of the nearby Westwood town centre in Thanet is omitted (nor is it mentioned in policy TC2).
	Policy EKA10 - Infrastructure	Please see our general comments under Section E
	Policy 2 - Ashford	There is some confusion about the priority to be given to facilities and measures to support walking and cycling The third paragraph suggests they are likely to be required by 2016 but subsection viii suggests such provision will only be made after 2016. This is due to revised RSS chapter for Ashford being inaccurately quoted in the draft RSS. Sub-paragraph viii and ix need to be corrected.
	<b>E4: KENT THAMES GATEWAY</b>	
	Paragraph 2.2.	Is there sufficiently robust evidence that delivery of the housing capacity figures in the Inter-Regional Planning Statement (outlined in par 1.3) is not practical, as stated?
	Policy KTG1 – Amount and	The figures for housing provision from 2006-2016 are only around 50% of the capacity identified by the Inter-regional



Distribution of Housing	Planning Statement. Does the evidence justify this reduction? How does the plan address the implications (social and economic) of this reduction?
Policy KTG2 – Affordable Housing	Please see our response to Policy EKA2
Policy KTG3 – Core Strategy	Is there any rationale for including the Core Strategy in the middle of the section rather than at the front?  A form of words as used in the RPG9 amendment on Ashford might be more appropriate viz. “This (the proposed growth) will necessitate the phased and co-ordinate provision of quality community, economic, environmental and social infrastructure. This should include:” We would also point out that much of this policy repeats policy elsewhere and does not add any real value.
Policy KTG3i -	This policy could be interpreted as “no greenfield development at all, until all brownfield land exhausted” which goes beyond policy in PPG3 . Emerging policy in PPS3 states that the RSS should set a brownfield target for the Region, but seems to give no support to such restrictive policy. It also contrasts with policy KTG7v (see below).
Policy KTG3viii	This policy seems to elevate Strategic Gaps to the same status as nationally designated areas like Green Belt and AONB. What is the justification for this? We would also refer the Panel to our comments on CC10b
Policy KTG 5 – Criteria for Provision of New Employment Land	The policy has no sub-regional specificity and fails to add any value.
Paragraph 2.20	This is a statement of fact with no indication of how it will be addressed. There should be statement to the effect that the situation will be reviewed when decisions on the destinations of CTRL domestics are known.
Policy KTG 7v – Locational Criteria	See our response to Policy KTG3i.
2.21, Policy KTG8 I & iii – Retail Centres	There is a lack of clarity about the role of Bluewater and Ebbsfleet. Bluewater/Ebbsfleet is identified in policy TC2 as a regional centre. But 2.21 states that it will not be acceptable for convenience shopping to be developed at Bluewater, which prevents it ever being a “proper” town centre, whilst (policy KTG8iii) at Ebbsfleet only retail and services “of a scale to serve the resident and daytime population” will be provided.
Policy KTG11i – Implications for the Thames Gateway Growth Area	How would this be implemented by LDFs, especially the provision of rail connections?
Policy KTG11 iii & iv	There should be a broader look at the potential of Maidstone to support the Thames Gateway growth area especially if it is to play its role as a regional hub. Panel might wish to consider how best to achieve that especially in the light of the anomaly created by Maidstone being a regional-hub located outside a draft RSS sub-regional policy area.
Policy KTG12 - Infrastructure	The practicality and timescale of the study proposed by this policy should be fully addressed. The policy KTG12 is

		primarily concerned with the terms of reference for the proposed study on lower Thames crossing and is better suited for supporting text.
	<b>E5: LONDON FRINGE</b>	
	Paragraph 1.5	Is evidence available that Guildford, Reigate/Redhill and Woking have no capacity for major growth? This ought to be substantiated in the Plan.
	Paragraph 1.8	We question the rationale for the Key drivers for the sub-regional strategy to confine itself to affordable housing while making no reference to the need for meeting overall housing needs. We would also like to draw attention to the PPG3 requirement “ to meet the housing requirements of the whole community” (PPG3, paragraph 2).
	Paragraph 2.17	Whilst acknowledging the influence of complex commuting patterns, there appears to be a obvious mismatch between the forecasted increase in jobs in the sub-region between 2006 and 2016 (73,200) and the proposed level of housing provision (37,360 between 2006 and 2026 under policy LF2). If insufficient housing is provided locally, the clear implication is increased medium and long-distance commuting, with consequences for an already overloaded transport infrastructure and already severe housing affordability. The balance between projected employment growth and new housing provision is a topic which should be explored at the examination.
	Policy LF1 – Core Strategy	Sub-paragraph i) is unclear when it refers to “sustaining growth in the local economy to a level that can be supported by labour markets” Does this refer to local, sub-regional or Travel to Work Area based market? Constraining economic growth to a local labour market would have serious consequences on centres such as Guildford and Woking. How the spatial policy does expect to implement this?  Sub-paragraph iv) – “giving priority to meeting locally defined housing needs,..” – What is meant by the term “locally defined”?
	Policy LF2 – Broad Amount and Distribution of Housing	Stipulating the housing figures as “annual rates” does not allow any flexibility for annual variations and conflict with draft RSS policy H1 that recognise the housing distribution figures as annual average rates.  The reference to LF5 should be deleted. (please see our comments on LF5 and the general comments under section E on ‘conditional approach to housing provision’)  Notes to the table: It would be helpful to have Panel’s advice on the appropriateness of the principle of including housing requirements relating to parts of Mole Valley and Tandridge that lie outside the LF sub-region within the provisions for the LF sub-region. We also question the decision to include provisions for parts of Surrey Heath that lie within the LF sub-region within the figures for another sub-region (WC & BWV)
	Policy LF5 - Infrastructure	This policy contains either statements of intent or wording those conflicts with Government planning policy. Please

		see our general comments under Section E.
	Policy LF11 – Thames Basin Heaths	Please see our response to Policy WCBV9
	<b>E 6: WESTERN CORRIDOR/BLACKWATER VALLEY</b>	
	General	It would be helpful to have greater clarity on the sub-regional approach to Blackwater valley that cut across the sub-regional boundary.
	POLICY WCBV3: Scale and Distribution of Housing	We are concerned whether the sub-region is likely to meet its housing needs in the light of notes to the Policy WCBV1 that refer to Wokingham and Basingstoke. We would welcome an assessment of the robustness of the Plan in this regard. Panel may want to consider whether the Plan is clear in terms of the role of the local authorities to implement it and in the event that the concerns of any local authority is realised how the appropriate contingencies should be put in place .
	Policy WCBV4 – Employment Land	We are concerned about an approach whereby employment sites are retained rather than released for other uses unless it can be proved that they are incapable of meeting the needs of business, as this blanket retention approach appears to be contrary to advice set out in current PPG3 updates (replacement paragraph 42 (a)). This economically buoyant sub-region may need strong protection on employment land but the case for that need to be established based on up-to-date employment land reviews. (Please also see our representations on Policy SCT3 / Sussex Coast)
	Paragraph 2.12	Panel may wish to examine the implications of serious miss-alignment between jobs (115,500 during 2006-2016 10 years) and houses (89,520 for 2006 – 2026, 20 years). Please also see our general comments on Section E.
	Policy WCBV5 – Smart Economic Growth	The policy appears to be sub-regionally specific. We would like the Panel’s advice on the appropriateness of the application of smart growth as given in policy WCBV5. In particular, it is not clear whether the policy aim to “encourage forms of economic activity in the sub-region which minimise the demand for additional labour” is expected to reduce the future jobs growth below what is indicated in paragraph 2.12. Does the policy aim to encourage more residents into work with an aim to reduce the need for additional commuting and immigration or is it about a reduction in the jobs growth? How does it align with the economic growth objectives in the draft RSS and the RES?
	Policy WCBV6 - Infrastructure	Policy has no sub-regional specificity and should be deleted.  We would also like to direct the Panel to our comments on infrastructure in Part A, against policy CC5 and our general comments on Section E.

	<p>Policy WCBV9 – Thames Basin Heaths Special Protection Area</p>	<p>We would suggest the Panel to consider the Thames Basin Heaths SPA as a priority. As well as informing their recommendations on housing distribution across the region, we would suggest that they need to:</p> <ul style="list-style-type: none"> <li>• Explore whether the Assembly’s working assumption that a workable approach to dealing with mitigation effects can be found (paragraph 2.26). This may influence the basis for determining the district level housing allocations for the Western Corridor &amp; Blackwater Valley sub region (Policy WCBV 1)</li> <li>• Hold a Technical Round Table ahead of the EiP to look at detailed issues</li> <li>• Test the ‘3-pronged’ approach in the English Nature Delivery Project (on-site mitigation, access management measures and off-site compensation)</li> <li>• Test the 16 &amp; 8 hectare mitigation standards wanted for Zones B &amp; C by assessing evidence for standards and, inter alia, the peer review of that evidence soon to be commissioned by DCLG and taking into account the audit of the cost &amp; availability of mitigation land being led by the Assembly</li> </ul> <p>By the time of the Examination, it is intended that sufficient progress will have been made to enable this section to be rewritten to include a strategic policy indicating the means by which the twin aims of environmental protection and housing delivery will be achieved. The policy and text may also contain guidance for Local Development Frameworks. It should be noted that, as written, the policy and text only covers one of the three prongs referred to in the English Nature Delivery Project; that is mitigation in the form of new land having regard to the proposed Delivery Plan. Research commissioned by SEERA, DCLG and others will augment the current evidence base with regards to each of the three prongs (Access Management, Habitat Management, Mitigation). The final version of the policy and text will need to appropriately reflect the spatial implications of each.</p>
	<p><b>E7: CENTRAL OXFORDSHIRE</b></p>	
	<p>Policy CO2 – Housing distribution</p>	<p>According to the figures contained within the section, there appears to be a balance between the forecasted jobs growth and the housing growth (Policy CO2 and paragraph 2.13). However, the two forecasts appear to come from sources that are not consistent on the underlying assumptions. It would be helpful should this be further explored.</p> <p>The connection between the scale and distribution of housing and its Local Transport Plan (2) should be made and emphasised. Please also see our comments on CO6.</p>
	<p>Policy CO3 – Green Belt</p>	<p>The Oxfordshire Structure Plan Panel Report (December 2004) advocated that a review of the Oxford Green Belt should take place in order to facilitate the proper future planning of the city and wider sub-region beyond the lifetime of the 2016 Structure Plan. While the Panel recognised that the timing of the South East Plan was such that it would be unlikely that the required review would be completed in time to be reflected in the SEP, they were clear that the</p>

		<p>scale of development should be decided regionally, with detailed choices made via Local Development Frameworks. The Panel also considered that given the inter-relationships and need for collaborative working joint Local Development Documents may be the way forward. Finally the Panel considered that in order to avoid the type of impasse that developed in connection with Didcot it would be important to ensure the arrangements for the review and any outcomes were clear.</p> <p>We are not aware of any evidence or change of circumstances that would invalidate the Structure Plan Panel's views. Consequently, the Panel may wish to consider whether CO3, or another policy, should now provide the strategic guidance regarding the carrying out the advocated Green Belt review. If the Panel agree that such a review is necessary, they may also wish to indicate the scope of the review, the possible options/outcomes to be addressed by it, and the means by which any recommendations should be implemented.</p>
	<p>Policy CO4 – Affordable Housing</p>	<p>We are concerned that this policy sets out a target of at least 50% in response to assessments of local need. Whilst we would not dispute the high levels of need for affordable housing in Oxfordshire we are concerned that the policy has neither been framed with a view to the economic viability of sites coming forward, or on the basis of any robust evidence as to whether this policy is deliverable. We also note that this figure is 10% higher than the figure set out in policy LF3 (London Fringe) and yet, with the exception of Oxford we are unaware of any circumstances that indicate a higher level of need or a more favourable planning gain climate than the London fringe, which will allow delivery of this policy.</p> <p>We aware that some work on viability has been carried out for the Oxford City Local Plan, but note that the City has particularly high land values, a strong market and site characteristics that mean that the delivery of all housing, including affordable housing may not be fettered. We would question whether this is the case elsewhere. The Panel may want to be aware that viability work has been carried out in various parts of the region, including Oxford, Surrey, Winchester, Brighton and Fareham.</p> <p>We would also ask what the 'enforceable arrangements' referred to are, and how this policy affects those with rights to buy or in shared ownership accommodation.</p> <p>The Panel may wish to reflect on the evidence presented to and the conclusions of the Oxfordshire Structure Plan Examination.</p>
	<p>Policy CO6 - Transport</p>	<p>While it is recognised that the County Council will have a leading role in promoting the effective management and development of Oxfordshire's transport networks, the policy should not be limited by its exclusive reference to the County. Therefore the policy should be amended to reflect the multi-agency partnerships that will be required.</p> <p>It is assumed that the Councils/SEERA have been working closely with the likes of the Highways Agency and others to ensure that the Transport Framework is appropriate, robust, agreed and deliverable, and, in turn, will facilitate the</p>

		orderly and timely implementation of the South East Plan. It is also assumed that the LTP2 will play a fundamental role in achieving the aims of the SEP and hence its production and implementation will be closely linked to, and pay due regard to, the SEP. An example of the need to link the strategy and LTP2 is with regard to the pursuit and potential delivery of East West Rail at Bicester. Similarly, there is a clear need, as identified by the Structure Plan Panel Report (December 2004) for all parties to work together to ensure both the effective management of the strategic road network, particularly the A34, and the delivery of the development promoted in successes structure and local plans.
	Policy CO7 - Infrastructure	We are not convinced that this policy adds value to the Plan, as it describes a process that should happen in any event. Paragraph 4.9 of PPS12: Local Development Frameworks already advises that local planning authorities should ensure that the delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Please also see our general comments on Section E.
	<b>E8: MILTON KEYNES AND AYLESBURY</b>	
	Paragraph 2.4	It is suggested that the Panel discuss the merits of coming to a definitive view on the whether joint DPD should be prepared and an indicative scale of growth they should facilitate, between Aylesbury Vale and Milton Keynes.
	Policy MKAV1 – Spatial Framework	The Panel may wish to discuss whether the shortfall in provision from 2001-2006 of approximately 1300 dwellings in Milton Keynes should be rolled forward into the later phases of the Plan. This may be a matter that is discussed in the broader discussion on regional housing numbers. However, given the scale of the shortfall is high, being one the highest in the region of any local area does this represent a circumstance that would justify rolling forward this shortfall?
	Paragraph 5.2	This calls for monitoring housing delivery on a one new house to one new job basis. This approach is too precise and impractical and not what is meant by achieving a sustainable balance between jobs and houses. Moreover, this goes against the position in the MKSM sub-regional strategy that treats the employment figures as reference values and not as targets (see The Strategy for the MKSM sub-region, paragraphs 19 and 20).
		It would be helpful if the Panel were to consider whether the draft RSS has managed to incorporate the Strategy for the MKSM sub-region in a seamless manner. It appears that some of the policies have been either amended or not included within the draft RSS (i.e. MKSM Policy 4). Should that be the case, what is the rationale? How does this meet the requirement set out in the MKSM strategy to make any revisions to the strategy in a co-ordinated way that involves all three regions?
	<b>E9: GATWICK</b>	
	General	We consider that RSS should ensure that strategic locations named in the adopted West Sussex Structure Plan are

		carried forward to provide an ongoing conformity hook to secure continuity of plan-making and housing supply. In that context, we note paragraph 2.3 which says that investment should be secured to facilitate growth already planned. For that to happen there needs to be the certainty that existing strategic commitments such as East Grinstead, West of Crawley and West of Horsham are carried forward by RSS. To add to that certainty, RSS guidance is needed to deal with the East Grinstead Relief Road (because some options may cross county boundaries) and the M25/M23 junction.
	Policy GAT1 – Spatial Strategy	All reference to strategic gaps should be deleted (see comments on Policy CC10b).
	Policy GAT2 – Housing Distribution	We note that the East Kent & Ashford Sub-Region is expected to accommodate 48,000 dwellings between 2006 & 2026 whereas the Gatwick Sub-Region is expected to accommodate 33,000 dwellings over the same period. If Gatwick is important to the national economy, is there a case to be made for raising housing requirements and investing in the sub-region as a growth area?
	Policy GAT5 - Infrastructure	This policy appears to be a statement of intent and describes processes that will happen in any event.
	<b>ISLE OF WIGHT</b>	
	Policy IW3 - Infrastructure	This policy appears to be a statement of intent and describes processes that will happen in any event.
	Policy IW4 – Rural Areas	The value of the last sentence is not clear, as the rest of the policy addresses rural areas and there is no definition of rural priority areas in the accompany text or of where these specific areas are on the island.

OTHER ISSUES	
Implementation Plan	Please see part A.
Monitoring	<p>We welcome and support the extensive work carried out by the Assembly in recognition of the importance of Monitoring as a key dimension of the Government's Plan, Monitor and Manage approach. We believe that the draft RSS has been developed in a context of serious commitment to ensure best practice in monitoring. We also would like to emphasise monitoring as a key activity that inform the preparation of RSS as well as assess the implementation and the continued relevance of the RSS and its policies. Government published a number of key guidance, including Regional Spatial Strategy Monitoring: A Good Practice Guide – Dec 2005 and the Core Output Indicators for Regional Planning – March 2005 that needs to be taken into account in developing the RSS. However, best practice is an on-going pursuit. We, therefore, would find it very helpful if the draft RSS approach to monitoring is clarified and tested to support and promote best practice in line with Government policy and guidance.</p> <p>Some of the key issues that may be explored here are:</p> <ul style="list-style-type: none"> <li>• Is the evidence resulting from monitoring that has been carried out to inform the draft RSS is transparent and robust?</li> <li>• Is it appropriate for the RSS to list monitoring targets in a separate document that is generally cross-referenced, in the absence of a specific generic policy on monitoring and/or targets being included within the text of RSS policies and/or supporting text?</li> <li>• Are the draft RSS policies sufficiently outcome focussed? Are they SMART policies? How does the RSS best strike the balance between the difficulty in measuring outcome/output of some policies and the need for the RSS monitoring to inform and trigger action on policies that are not being appropriately implemented? Is there a clear distinction between indicators to monitor whether policy is being implemented, whether it is successful, and whether it is still appropriate?</li> <li>• Is there a right balance between policies in the draft RSS, targets in the Draft RSS Monitoring Framework document and the indicators? For instance should there be more efforts to identify targets including indicative targets in relation to output and outcome indicators for which there are no targets at present (i.e. RE2 employment Land provision)?</li> </ul>



		<ul style="list-style-type: none"> <li>• Are the targets and indicators consistent with other strategies and initiatives such as RES?</li> <li>• Are they the most appropriate targets, and/or indicators to help monitor the particular policy? For instance, is the number of local authorities with housing needs and market assessments is the best guide to monitor policy H6: Type and size of housing OR does monitoring VAT registration and de-registration by sector, by Local authority area provide the best contextual monitoring for Policy RE1: Supporting Regionally Important Sectors and Clusters?</li> <li>• Does the draft RSS approach to monitoring meets the requirements set out in the planning legislation, planning policy and good practice guidance?</li> </ul>
	Casinos	<p>The Panel will be aware that the Government has set up an advisory panel to look at possible new locations for casinos, which is due to make recommendations to Government by the need of 2006. Bids for Regional Casinos have been received from Southampton City and Dartford Borough Councils. We note that the draft contains paragraphs 5.3 -5.5 in Section D10 which explains the approach taken in the draft plan.</p>