

Colin Byrne
Regional Director
Government Office for the South East
Bridge House
1 Walnut Tree Close
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Tuesday 26 August 2008

Dear Colin,

DRAFT SOUTH EAST PLAN PROPOSED CHANGES

As you are aware, the Assembly is currently preparing its response to the consultation on the draft South East Plan Proposed Changes. We will be taking a draft response to our Regional Planning Committee on 24 September and to Assembly members on 17 October.

We have some significant concerns about the implementation of some of the proposed South East Plan policies, in particular how these can be carried forward into Local Development Frameworks and subsequently delivered through the development control system. We will be registering these concerns in our formal response to the consultation; however I would like the opportunity to discuss these further with yourselves; CLG; PINS and local authority representatives as soon as possible to ensure that the final South East Plan is deliverable. Can you confirm whether you are happy to be involved in this meeting?

There are also a number of aspects within the Proposed Changes documents on which we would like further clarification from GOSE. As agreed with Richard Lemon, we have set these out in the accompanying annex to this letter and would welcome your written response to the questions at the earliest opportunity.

As always, I am happy to discuss any of the above further.

Yours sincerely,

Catriona Riddell
Director of Planning

cc. Howard Ewing, GOSE
Richard Lemon, GOSE

South East Plan Proposed Changes Requests for Clarification from Regional Assembly to GOSE (August 2008)

Introduction and Overview

1. No reference is made in Appendix A to the Kent and Oxfordshire Structure Plans. Can you clarify whether the final Plan will state which of the Oxfordshire and Kent Structure Plan policies will be directly replaced on adoption of the South East Plan?

Spatial Strategy

2. Policy SP3 states that LPAs will seek to achieve at least 60% of all new development in the South East on PDL and through conversion of existing buildings. Can you clarify whether this 60% applies to housing as well as to all new development?

Key Diagram

3. Can you clarify whether the final Key Diagram will identify Shoreham and Dover as new growth points?

Housing

4. Policy H1 sets out housing provision between 2006 and 2026. Can you clarify whether a 'clean slate' applies at 2006? Also, can you clarify that a 'residual requirement' approach applies within the RSS period?
5. The wording of sub-regional and areas outside sub-regions housing policies are not consistent with each other or Policy H1? Can you clarify whether this is intentional?
6. Policy H1 appears to contain errors with regard to the figures for the Milton Keynes and Aylesbury Vale sub-region and the Rest of Buckinghamshire (which are not consistent with elsewhere in the Plan). Can you clarify that the average annual provision for MKAV is 3,693 and for Rest of Bucks is 185?
7. Policy H3 refers to 'other forms of affordable housing', although the proposed supporting text uses the PPS3 term 'intermediate housing'. Can you clarify whether this inconsistency is intentional?
8. The reference in the supporting text to Policy H4 (ref Chap 7(16)) to cross boundary working has been deleted, and no amended reference to joint working is included. Can you clarify whether deletion of this reference is intentional?
9. Supporting text is included on Provision for Gypsies and Travellers (ref Chap 7(25)) but no reference is made to the extended scope of the review to address the needs of Travelling Showpeople. Can you clarify whether this is intentional?

Transport

10. The supporting text to policy T2 states that 'any future reviews of the RTS should also consider regional standards of public transport accessibility'. Can you clarify whether the intention is that this should be considered as part of the forthcoming RSS review?
11. Policy T13 retains the draft Plan reference to 'up to 3 intermodal interchanges'. Can you clarify whether this is intentional?

12. Map T1 does not include the Oxford to Milton Keynes inter-regional corridor. Can you clarify the particular Panel recommendation to which this deletion relates?
13. Map T2 does not include a regional spoke from Dover to Thanet. However in the East Kent and Ashford sub-regional strategy, the final proposed change (no ref) refers to the addition of an additional regional spoke from Dover to Thanet. Can you clarify whether it is the SoS's intention to include this spoke or not?

Town Centres

14. Policy TC1 and TC2 appear to identify Centres for Significant Change as a separate tier to Primary Regional Centres within the strategic network of town centres, however supporting text to policy SP3 highlights their role *within* the Primary Regional Centre designation (reflecting the Panel Report). Can you clarify the intended status of Centres for Significant Change?

Sussex Coast

15. Sub-regional Key Diagram - Bognor Regis is not included as a secondary regional centre. Can you clarify whether this is intentional?

WCBV

16. Sub-regional Key Diagram - High Wycombe is not included as a hub or primary regional centre. Can you clarify whether this is intentional?
17. The Proposed Changes state that Map T2 should be amended to include a spoke linking High Wycombe and Maidenhead (ref Chap 21(17)), but this is not included on the Map. Could you clarify whether it is the SoS's intention to include this spoke or not?

Areas Outside Sub-Regions

18. In the justification document (refs Chap 25(17), (20), (25), (28) and (30)) figures in bold setting out additional provision in the 'rest of county' areas do not sum from the proposed district figures. Can you clarify that the figures proposed for the areas outside sub-regions are as recommended by the Panel (not those included in bold)? We note that these bold figures are not included in the companion document.
19. We also note that in the companion document housing allocations for areas outside sub-regions are included in policy, although this is not the case in the justification document. Can you clarify whether the intention is to include specific policies addressing housing provision in the areas outside sub-regions in the final Plan?