

5. Regional Consultation: Summary of Regional Views and Responses

This section outlines the key regional issues raised through regional consultation on the draft South East Plan (January - April 2005), and the Assembly's response. Some policy numbers in this section refer to the January 2005 version of the Plan. Following the consultation on that version, several policies have been renumbered in the draft submitted to Government.

5.1 Vision and Overall Strategy

- 5.1.1** The volumes of comments on the vision and overall strategy were wide and varied, though there were a number of key issues that were raised frequently, and they are listed in more detail below.
- 5.1.2** The vision and overall strategy received general support from many sectors, though members of the public levied the greatest criticism of the Plan, particularly its role and purpose. Some felt the vision did not relate directly to the overall principles in the Plan and lead smoothly onto the policies.

- 5.1.3** The overwhelming areas of agreement were on affordability and infrastructure. The affordability issue was acknowledged, though the link between this and the levels of development needed to support this were not directly made. There was universal agreement that in whatever levels of development the region commits to, it will require the appropriate infrastructure to deliver this growth.
- 5.1.4** There were concerns from organisations with an interest in rural areas, as well as local residents, who felt the Plan did not adequately recognise the role of the rural areas and did not plan for them accordingly.
- 5.1.5** The early sections of the core document remain much the same although it has been re-ordered so that there is a better flow from vision to policies, which aims to overcome concerns about the relationship between the overall strategy and individual policy elements of the Plan.
- 5.1.6** The urban/rural roles and the according emphasis given to both in the plan have been further clarified in section B – Context. Sections A-C of the document have been updated in light of new data and information that emerged from research over the spring and summer 2005.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Vision	Overall, there was general support for the vision, however, there was concern that the vision was not specific enough to the South East. Also, there was some concern that there was not enough clarity in the relationship between the policies and vision, resulting in suggestions that there is not sufficient evidence to suggest that the vision for the region can be delivered	The vision has been shortened by removal of the bullet points, so as to focus on the core message for the South East of a healthy region. The link between the vision, the principles, the Integrated Regional Framework and the policies is now more clearly articulated
Housing Led Growth	Many considered the growth should be economic led and not housing led, which would inevitably lead to the region becoming over-crowded	We considered that to talk of either economic or housing led growth is oversimplistic. Both elements have a necessary role. We have, however, redrafted the text to strengthen the economic dimension and place the housing need in a clearer and wider sustainable development context

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Regional Diversion	Within a national and international context, the role of the region over the longer term was questioned. Many respondents wanted to see development re-focused away from the South East to the north, and questioned the degree to which the region should continue to act as the 'economic dynamo' of the country	This suggestion was not accepted, at least for the medium term. There is a built in economic momentum, which it would be dangerous to suppress, for social as well as economic reasons. The levels of economic growth for the South-East are modest in historic terms and we are not proposing increased rates of growth. For the longer term it is possible that other regions' development performance will improve faster than the South-East and this might have implications for the scale of development. The Plan therefore leaves the longer-term more open and subject to review
Sustainable Economic Growth	The Plan was considered to take economic growth for granted and many respondents questioned whether the proposed level of economic growth propounded in the Plan and RES is in fact convincing and achievable	The Plan has been developed from a careful assessment of potential economic growth. The proposed rate of growth is a little lower than achieved in the recent past. The Plan certainly does not take economic growth 'for granted'. The final draft Plan emphasises that a considerable effort will be necessary to achieve such growth, especially in the less prosperous parts of the region, and presents formal policy measures to help achieve this
Urban Focus	The plan is considered by many to be too urban focused and does not consider the needs of the more rural parts of the region	The Plan documents have an urban focus and this is considered essential to meet sustainable development principles. Where rural areas have strategic needs, such as affordable housing and countryside management, these are specifically recognised. In order to make this rural dimension clearer, a specific new section was added in the introductory chapters of the submitted Plan
Conditional Development	Respondents were very clear that any development, whatever level agreed, should be conditional on the guarantee that the infrastructure required to deliver it would be forthcoming, either before or in parallel with the development itself	The infrastructure dimension was always a key feature of the Plan. The final draft contains some revised wording to emphasise this need even more strongly. The submitted Plan also includes an Implementation Plan. In addition the Assembly has also proposed a Concordat with Government on infrastructure delivery
Role of London	The role of the capital and its impact on the region is widely acknowledged and accepted. This role should not be underestimated or the future of the relationship taken lightly. However, there were some areas of concern on the fringes of the two regions and calls for the South East to remain distinct from London by the metropolis	Following the comments more research was commissioned to draw out the London relationship more clearly and distinctly. This was then expressed by clear redrafting of part of the cross-cutting chapter

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Sustainable Development	Some consider that the concept of sustainable development should not be a theme running through the Plan, rather a policy against which the sustainability of the region can be measured	Assembly members considered that the challenge of sustainable development needed even more emphasis. They therefore agreed to add a specific over-arching and cross-cutting policy to the final Plan. A monitoring structure has also been established to measure progress using the Integrated Regional Framework as a template
Affordability	The need for affordable housing is universally accepted, but its relative contribution to the overall housing number is a matter for dispute and there are doubts about effective delivery	There has been considerable additional work undertaken about delivery of affordable housing as part of the recently submitted Regional Housing Strategy. A regional affordable housing figure is needed to demonstrate the scale of the overall need, and is expressed as a percentage of agreed totals. It forms part of the overall need for housing. Only minor changes to wording have therefore been made

5.2 Scale and Distribution of Growth

Scale of Development

- 5.2.1** Many respondents commented on the national context for the regional debate and argued that, in national terms, development should be moved away from the South East, to other regions. In particular, that there should not be the creation of additional employment to attract more people to the South East. However, others argued that development must meet population projections and particularly needs of migrants from London and sufficient dwelling provision should be made to avoid potentially significant negative impacts on the East Midlands or East of England regions.
- 5.2.2** There is a strong divide on scales of growth, with approximately 45% supporting growth at 25,500 pa or less and 40% supporting growth at 32,000 pa or more, with many supporting a growth rate of 36,000 pa. The comments preferring a lower growth option were predominantly from environmental groups, countryside groups, residents' associations, community groups, parish councils, district/borough councils and from individuals. The comments preferring a higher

growth option were predominantly from housing corporations, chambers of commerce/ CBI, landowners, developers, housebuilders, economic partners and again from individuals.

- 5.2.3** The respondents who argued for reduced levels of growth or, in a significant number of cases, no growth at all, were concerned that more housing would reduce quality of life and that all the options being consulted on would have negative impacts on the environment. The respondents who argued for higher levels of growth contended that they were essential to maintain the region's long-term economic prosperity and competitiveness, without which the region's quality of life would be undermined. In particular, the lower growth options would have a severe impact on the ability of the Plan to provide businesses with the necessary employment pool.
- 5.2.4** Regardless of the level of growth supported, respondents emphasised the need for a focus on affordable housing and for infrastructure to be put in place before housing development. Also, that work was needed to ensure that the building rates no longer failed to meet the planned rate in RPG9.

- 5.2.5** A number of comments were made on the technical basis for the scale of development. Many respondents argued that the Plan should be more flexible and include regular reviews to make room for strategic responses to change. A number of comments stated that the technical basis was unclear.

Relationship of Housing Development with Economic Growth

- 5.2.6** Many respondents considered the strategy over-emphasised the housing dimension and a greater emphasis was needed on the economy, infrastructure and other considerations. Again there is a division about scales of economic growth with, interestingly, rather more support for economic growth than housing growth, and many respondents not seeming to appreciate their inter-relationship. A number of those who commented were concerned that continued economic growth would undermine the environment and quality of life in the region. They considered the 3% in the Plan too high and want to see lower options considered. A number argued that 3% is a robust basis for the Plan, and a minority suggested that a higher figure would be more realistic.

Distribution of Development

- 5.2.7** In terms of the distribution of growth, many respondents considered that the Plan should seek to address the economic disparity between the east and west of the

region and supported the need for a focus on growth in the south and east of the region, in the Growth Areas and in South Hampshire.

- 5.2.8** There was a division in comments on the policy options. Respondents who supported the Sharper Focus option felt there was a need to promote a balance between regeneration areas and areas of economic opportunity. Respondents who supported the Continuation of Existing Policy option argued that a more even distribution of growth would allow the effect of polarisation and exclusion to be minimised and that Sharper Focus left rural areas with too little new development.
- 5.2.9** A general principle supported was that the focus for development should be urban areas and previously developed land (PDL), with some respondents suggesting that the target should be increased from at least 60% of all new development on PDL to at least 75%.
- 5.2.10** There were a number of comments on the overall approach including suggesting that housing allocations should be bottom-up or decided at sub-regional level. One specific issue was that the level of growth was too low for the non sub-regional areas in general and specifically in areas of Kent outside the sub-regions.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Scale of Development	Strong division of opinion on the scale of growth	Taking into account all the considerations of need, impacts and delivery the Assembly has concluded that an annual average growth level of 28,900 pa would be appropriate
	Need for an emphasis on affordable housing, infrastructure and to ensure that building rates are met	Supporting text added stating that the Assembly will monitor progress being made to eliminate or reduce the backlog and urge the Government to ensure a sustained and sufficient public investment in affordable housing and associated infrastructure

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Scale of Development - continued	Need for Plan to be more flexible / for regular reviews	Supporting text added stating that performance will be subject to regular assessment and a specific growth figure can be incorporated in a subsequent review of the Plan
	Technical basis unclear	No change made. A technical note setting out the process for the development of options has been published separately
Relationship of Housing Development with Economic Growth	Strategy over-emphasises the housing dimension and a greater emphasis is needed on the economy, infrastructure and other considerations	Supporting text states the importance of the inter-relationship of housing development with other dimensions
	Division of opinion about scales of economic growth	Assembly acknowledged difficulties of forecasting scale of economic growth and rate provided for first 10 years of Plan only
Distribution of Development	Address the disparity between the east and west of the region, support the Growth Areas and South Hampshire for focused development	Supporting text added setting out the preferred spatial strategy, including reference to addressing intra-regional disparities and supporting the Growth Areas and South Hampshire
	Support for a balance between regeneration areas and areas of economic opportunity	Supporting text added supporting the addressing of intra-regional disparities as well as support for continued economic growth in the most heavily constrained parts of the region
	Support for a more even distribution of growth and criticism of the limited development of rural areas under the Sharper Focus option	Supporting text added stating that the sustainable development of all communities will be promoted and that appropriate rural development will be provided
	Housing allocation should be bottom up or decided at the sub-regional level	Work carried out by sub-regions has influenced the sub-regional and county housing figures (Core Document Table C3) and determined the allocation at district/borough level
	Level of growth too low for the non sub-regional areas generally and specifically in Kent	The provisional housing figures (Core Document Table C3) allocate additional growth to these areas compared to the Sharper Focus consultation options and additional growth to Kent compared to all consultation options (1,200 compared to 200 – 1,000 in consultation options)

5.3 Active Management – Policy CCI

5.3.1 The majority of respondents called for this policy to be deleted, or as a minimum, substantially revised, as it was felt that it was a duplication and did not add value to the overall policy framework. The scope of comments – ranging from housing numbers to countryside preservation – indicate the different meanings of this policy to different interest groups and individuals

5.3.2 The range of comments included:

- i** A statement of intent rather than a clear policy – The statement is too vague
- ii** Welcome in principle and hopefully practice. This is more of a statement than a policy and could be difficult to interpret and monitor. Repetition of Government policy
- iii** Policies that support viable farming enterprises in the urban-rural fringe will counter dereliction and under-use of land and contribute to a thriving landscape
- iv** The urban-rural fringe needs better management
- v** High-density development should be considered to protect the countryside
- vi** The Plan makes insufficient mention of smaller airports and the need to protect them from housing development
- vii** Additional housing should be controlled, taking account of environment and infrastructure
- viii** There should be preservation of the countryside and better use of the existing built areas
- ix** This policy should be renamed 'Sustainable Development', focusing on improving quality of life
- x** This policy should be amended so line three reads 'adopt positive, sustainable,

and creative approaches' and so line five reads 'management so as to protect the environment, conserve resources'

- xi** The policy's emphasis on local authorities is good, but the 'positive management and intervention' must not compromise existing democratic processes
- xii** Support for Policy CCI because of its encouragement for conserving resources and raising standards.

5.3.3 In response to the issues listed above, Policy CCI has been deleted and specific comments picked up in other policies as amended.

5.4 Climate Change – Policy CC2

5.4.1 There was a large degree of support for the policy to address the causes and effects of climate change, but a call for more detail. In particular, many respondents called for inclusion of specific targets for reduction of carbon dioxide emissions reflecting national targets.

5.4.2 In response to the issues raised the wording of Policy CC2 has been considerably strengthened and now contains a target for reduction of carbon emissions. The policy also sets out specific actions required to mitigate and adapt to climate change. Many of these are then reflected in more detail in specific policies in the Plan, particularly section D5. A specific Implementation Plan identifies actions required to implement Policy CC2. In addition, a practitioners' guide to adaptation has been produced and is on the Assembly's website. The Implementation Plan will also address these issues and be complemented by a specific climate change adaptation and mitigation implementation plan.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
CO² Reduction Targets	The policy should include targets for CO ² reductions – 20% below 1990 levels by 2010 and 60% below 1990 levels by 2050 and for these to be addressed in LDFs, more accurately reflecting the IRF objectives	Policy includes targets for CO ² reduction reflecting national policy and targets. Many policies in the Plan aim to help to reduce carbon emissions including transport (T3,T4,T5,T6,T7,T14), waste (W1,W5,W11,W16), energy efficiency and renewable energy (EN1-EN4) and cross-cutting policies CC3 and CC4
Greater Detail, Regional Specificity and Guidance	Need for more clarity in policy on what is required – more specific reference to mitigation and adaptation and how this may be implemented and by whom	Policy sets out specific measures required for mitigation and adaptation to climate change, reflecting the principles proposed by the South East Climate Change Partnership
Implementation Plan	<p>Should develop a specific action plan and an inventory of greenhouse gas emissions to enable monitoring</p> <p>Need to make climate change a key driver for the Plan and more regionally specific</p> <p>Need for development to be adaptable to climate change</p> <p>Need to ensure wildlife habitats can migrate and adapt</p> <p>Need for indicators against which to monitor progress</p> <p>Need for commitment to public transport and shift from fossil fuels to hydrogen</p>	<p>A Climate Change Adaptation and Mitigation Plan is being developed to identify actions required to deliver the revised Policy CC2. This will inform the overall Implementation Plan but will also be a stand alone document given the range of measures required and to reflect the fact that climate change is a key driver of policy</p> <p>Work on a regional inventory of greenhouse gas emissions is progressing as data becomes available from DEFRA and through SECCP Emissions Sector group, that will be used in the Regional Monitoring Report</p>
Further Research	Need for further research on flood risk, including flooding from groundwater	Environment Agency expected to be including climate change effects in updated flood risk maps
Targets for Renewables in New Developments	All non-residential developments above a threshold of 1,000m ² should be expected to incorporate on-site renewable energy production equipment to reduce predicted CO ² emissions by at least 10%	Policy EN1 amended to include a target for commercial developments over this threshold and housing developments of more than 10 dwellings to provide 10% of energy demand from renewables

5.5 Resource Use – Policy CC3

5.5.1 Many respondents supported Policy CC3 on resource use; both the inclusion of a target to stabilise the region’s ecological

footprint and a minimum standard on sustainable construction. However there was also criticism for not going far enough and a few commented that the policy places too much constraint on developers.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Ecological Footprint	<p>Support Commitment to Stabilise Footprint</p> <p>Commitment to Reduce Footprint</p> <ul style="list-style-type: none"> There should be a commitment to reduce the region’s footprint by 33% Commitment for longer term target: “25% reduction in the region’s 1999 ecological footprint by 2025” Reductions should be made, especially by addressing the existing housing stock and changing transport patterns The region’s footprint should be reduced where environmental limits are breached <p>Concerns</p> <ul style="list-style-type: none"> The objective of ‘a reduction in absolute levels of consumption’ of natural resources is likely to lead to policies of substantial restraint at a local level <p>Strategy</p> <ul style="list-style-type: none"> A commitment should be made to develop an ecological-footprint reduction strategy 	<p>No Action</p> <p>Policy CC3 has been amended to reduce the ecological footprint during the second half of the Plan period. The policy now also covers implementation measures, including the need to adapt existing development to reduce its use of energy, water and other resources</p>
Construction Standards (Eco Homes or BREEAM)	<p>Support for standard</p> <ul style="list-style-type: none"> The minimum construction standard for all new development should be ‘excellent’ A ‘very good’ accreditation according to either the EcoHomes or BREEAM standards should be made a legal requirement of any new development <p>Reduce or Delete Standard</p> <ul style="list-style-type: none"> The requirement for ‘very good’ accreditation for new developments should be deleted or amended to a lower standard In terms of commercial development, the wording should be changed to ‘seek to attain adoption of BREEAM’ in all appropriate new commercial developments <p>Concerns</p> <ul style="list-style-type: none"> Environmentally sustainable standards of construction will not be met, particularly when developers build less profitable, ‘affordable’ housing 	<p>References to specific standards were removed</p>
Carbon Neutral	All new development should be carbon and water neutral	Policies promote high efficiency but tools to deliver “water neutral” development are limited

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Renewable Energy	The policy should include a requirement for use of renewable energy in new developments eg: "All developments (either new build or conversion) with a floor space of 1,000 m ² or more, or 10 or more residential units will be required to incorporate renewable energy production equipment to provide at least 10% of their predicted energy requirements from renewable sources	Policy EN1: 'Development design for energy efficiency and renewable energy' suggests that local authorities encourage developers to submit an assessment of a development's energy demand and provide at least 10% of the development's energy from renewable sources for housing schemes of over 10 dwellings and commercial schemes over 1,000m ²
Wider Coverage	<p>Range of issues</p> <ul style="list-style-type: none"> This policy should refer to a wider range of issues, extend to encourage the use of sustainably sourced local materials <p>Greater emphasis in the Plan</p> <ul style="list-style-type: none"> More efficient and reduced resource use needs to be emphasised in the Plan 	Comment addressed by the addition of two new cross-cutting policies – an over arching policy on sustainable development CCI and a new policy on sustainable construction CC4
Growth	An increase in the region's population will increase the actual use of resources. Any significant increase in number of dwellings must be fully justified	Comment addressed through new cross-cutting policy on sustainable development and sustainability appraisal
Clarity of Policy	The policy is too vague and should not be included	Disagree
Implementation	<p>National legislation must be put in place to help local authorities contribute to the 'stabilisation of consumption of resources'</p> <p>The REAP tool should be used (in setting/helping to achieve ecological foot print?)</p> <p>Need to change behaviour</p> <p>The policy should encourage greater innovation in energy efficiency and resource consumption</p> <p>Others suggested that sustainable construction assessments should be dealt with through the Building Regulations</p> <p>Policy should include an obligation that LPAs adopt SEEDA sustainability checklist</p>	Consideration of funding issues will be included in the Implementation Plan
Monitoring	To ensure and measure the effectiveness of the policy a clear monitoring system is needed	This comment will be addressed through the updated Monitoring Framework
Location of Policy	This policy should be moved to Sustainable Natural Resource Management	Do not agree, this is a cross-cutting issue
Contact	Scottish and Southern Energy (SSE) would like to meet with the Regional Assembly to discuss SSE's potential involvement as a multi-utility, with an interest in energy generation and energy infrastructure	On going discussions with utility companies

5.6 Infrastructure and Implementation – Formerly Policy CC4

- 5.6.1** The majority of respondents broadly supported this policy. However, there was widespread concern about the delivery and the timing of infrastructure in relation to proposed levels of growth in the South East. Others felt that there is an urgent need to address the current backlog of adequate infrastructure in the region before encouraging any further growth. (Nearly 60% of the responses on CC4 focused on these two issues).
- 5.6.2** The wording of the policy and the level of detail were often considered unclear or vague. In particular, the policy has given little indication of how the infrastructure needed to support the proposed levels of growth will be funded and implemented and what the role of the Government will be in providing funding.
- 5.6.3** The Plan should also include indications of the full range of infrastructure required

(including green infrastructure), not just transport.

- 5.6.4** Finally, a major concern was raised regarding how this policy will be applicable to different contexts (eg urban vs rural areas, sub-regions vs rest of areas etc.).
- 5.6.5** In response to the issues listed above, the wording of the policy has been strengthened and now contains clear reference to Local Development Documents, developer's contributions and the Government's role in providing funding. In this respect, the Assembly has proposed the need for a package of initiatives designed to improve infrastructure delivery; this package is underpinned by a proposed Concordat with the government.

The Implementation Plan will address the remaining issues. It will be more focused and will clearly set out key delivery agencies (and their role), different funding streams and new delivery mechanisms. It will incorporate sub-regional aspects of implementation and will focus on a wider range of infrastructure types.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Existing Backlog	Concern was expressed about the existing backlog of adequate infrastructure in the South East; current levels of infrastructure provision are not able to meet the region's needs	This concern has been noted. The policy has been strengthened and is now addressing this issue more directly; it will be considered in greater detail both in the Implementation Plan and the sub-regional frameworks
Further Growth	Planned levels of growth in the South East must be accompanied by the provision of adequate new infrastructure, while the pace and scale of development must be conditional on infrastructure provision	The policy has been strengthened to reflect the need for a more effective process of infrastructure delivery associated with the proposed growth
Government's Role	There should be more clarity regarding the role of the Government in providing funding; there is also a need to encourage Government to work together on a 'joined up' approach in delivering housing and infrastructure	The policy has been strengthened to better address this issue. A Concordat between the Assembly and the Government has been proposed
Level of Detail	The present wording of the policy is vague. Infrastructure and implementation is currently underdeveloped in the plan. Priorities for infrastructure should also be provided	The policy has been strengthened and the Implementation Plan will address this issue more specifically

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Funding and Implementation	The Plan gives no indication of how the infrastructure needed to support the proposed levels of growth will be funded and implemented	Consideration of funding issues will be included in the Implementation Plan
Delivery Mechanisms	SI06 alone will not provide for significant strategic infrastructure. A wider range of delivery mechanisms should be considered, including new innovative means	Full consideration of delivery mechanisms will be included in the Implementation Plan
Wider Range of Infrastructure	The South East Plan should include an indication of the full range of infrastructure required (including green infrastructure), not just transport	The Implementation Plan will include references to a wider range of infrastructure types
Small Areas/Areas Outside Growth Areas/Rural Areas	The South East Plan should make reference to the fact that a large proportion of new housing is delivered through small sites that do not trigger the threshold for major infrastructure contributions. Similar concern applies to infrastructure delivery in rural areas and locations outside Growth Areas and/or sub-regions	Concern noted. The Implementation Plan and the sub-regional frameworks will consider this issue in more detail
Urban Areas	It is unclear how this policy will be applied to existing urban areas, where further growth is likely to be incremental	Concern noted. The sub-regional framework and the Implementation Plan will address this issue more directly
Key Delivery Agencies' Role	The role of delivery agencies is not clear. The policy should include more detail on this	The role of key delivery agencies will be included in the Implementation Plan

5.7 Use of Public Land – Policy CC5

- 5.7.1** The majority of the respondents supported the intention of this policy. However, within this broad support, points of concern were raised (see below).
- 5.7.2** A small majority took the view that no public land should be developed, it should be given back to nature.
- 5.7.3** Policy CC5 works in conjunction with the other policies in the Plan. The concerns about the environmental designations and the development criteria are addressed by other policies. However, to slightly broaden the intention of the policy it is

added that Government and public landowners should look at land management opportunities as well as development opportunities. The wording of the policy has been changed further to address the ambiguity around the 'sites of regional significance'. The Implementation Plan will address the issue of overcoming constraints in the development process. It will be more focused and will clearly set out key delivery agencies (and their role), different funding streams and new delivery mechanisms.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Environmental Constraints	A significant number of public land sites are constrained by environmental designations. This should be reflected in the policy	Policy CC5 works in conjunction with the other policies in the Plan. Policies C1 to C4 ensure careful management of designated areas. However, it is accepted that this policy should not just refer to public land sites suitable for development The policy is changed for Government and public landowners to look at land management opportunities as well as development opportunities
Development Criteria	The suitability of public land sites for development should be measured using the same sustainability criteria as for other sites	Policy CC5 works in conjunction with the other policies that aim to achieve and to maintain sustainable development in the region. Policy CC5 is set within this context but policies CC12 and H3 specifically address these concerns No changes
Development Process	The policy should be strengthened to address the issue of how to overcome constraints in the development process	This will be addressed as part of the Implementation Plan No changes
Sites of Regional Significance	The 'sites of regional significance' should be defined or the criteria of how to define these sites should be given	Accepted that this wording is unclear. It is not possible to name all specific sites or the definite criteria The wording is changed to address this issue. 'Sites of regional significance' is deleted. It is stated that Government departments and public landowners should agree a disposal and implementation strategy at the regional level with the Regional Assembly and other partners
Nature Development	Public land should not be developed but should be given back to nature	Not accepted that all public land should be given back to nature No changes

5.8 Inter-regional Connectivity – Policy CC6

5.8.1 The majority of the respondents welcomed this policy. However, the wording and the intended output of the policy were often considered unclear or vague. In particular, the policy has given little indication of how principal authorities should be involved and what their role would be in addressing these inter-regional issues.

5.8.2 Respondents also felt the need to recognise stronger inter-relationships with the adjoining regions and particularly with

London, where housing and infrastructure needs are clearly linked to levels of provision in the South East. A minority of respondents were also concerned about the lack of explicit references in the policy to other non-adjoining regions or national areas.

5.8.3 In response to the issues listed above, the wording of the policy has been strengthened. It is now clearer and more focused and contains references to all adjoining regions. The relationship with London has been analysed in greater detail in light of new research now available to the Assembly.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Clarity	The wording and the intended output of the policy are not entirely clear	The policy has been re-worded and refocused to address this issue, recognising more recent research
Policy Harmonisation	Need for a greater focus on delivering harmonisation of regional policy	The policy has been refocused to reflect the need for closer policy and implementation development over the Plan period
London	Need to recognise stronger inter-relationship with London across the whole of the Plan, especially in terms of waste, transport housing and employment demand	Policy re-worded. Greater recognition of the role of London and specific topics have been highlighted for further work, building on increasing level of understand and research
Adjoining Regions	Need to recognise the role of the South West, East and West Midlands and East of England Regions in the Plan	Better recognition of importance of other regions contained in the Plan. Growing influence over Plan period of East of England and East Midlands are highlighted
Other Regions	The policy ought to ensure harmonisation between the region's development and that of adjoining regions and other national areas	Text has been amended to reflect the fact that the relationship with other areas will be of growing significance
Role of Authorities	The policy needs to clarify what the role of the principal authorities is in this issue. Little indication within the Plan of how inter-regional linkages are going to be addressed	Noted. This issue has been partly addressed within specific policy sections of the Plan; it will also be considered in the Implementation Plan

5.9 Urban focus – Policy CC7

5.9.1 Consultation responses generally demonstrated high support for the policy. However, a number of representations suggested that higher targets for development on previously developed land (PDL) should be included, ranging from 70% to 100%.

5.9.2 The policy has been slightly amended to make reference to 'urban renaissance', to widen its remit to include retail and other services, and to flag up the need to avoid unnecessary travel. The supporting text has been amended to make reference to the need to develop more sustainable patterns of development and lifestyles.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
General	<p>Consultation responses generally demonstrated high support for the policy</p> <p>The policy should make reference to the need for new communities/settlements and urban extensions</p> <p>The policy should apply to all urban areas, whether or not they fall within sub-regions</p>	<p>Comments welcomed. No change</p> <p>No change. The policy makes reference to urban extensions in clause (iii). If new settlements are proposed, this will be addressed in the sub-regional strategies</p> <p>No change. Policy applies to all urban areas, not only those within identified sub-regions</p>
Concentration of development within urban areas		
Definition of Urban	<p>A definition of urban should be included</p> <p>The definition of urban areas as settlements of 10,000+ population is not appropriate, and should be higher</p>	<p>A definition of urban is included in the Plan</p> <p>No change. The definition of an urban area as having a population of 10,000 people+ is a widely accepted definition, being used by ODPM and ONS</p>
Sequential Approach	The policy should make reference to the sequential approach set out in PPG3. All brownfield options should be explored before greenfield land is used	No change. It is not the role of the RSS to repeat Government guidance. PPG3 is referred to in Section D3 – Housing
Quality of Life	<p>The policy should include reference to the need to protect the quality of life in urban areas and small towns and villages, and protect the quality of the built and historic environment</p> <p>Some undeveloped land in urban areas is important as green space and wildlife habitat</p>	<p>No change. Key to the Plan's statement of policy is the need to maintain a high quality of life</p> <p>New policy CC12 seeks to protect the character of the environment and quality of life</p> <p>Section D7 includes policies about the role of small rural towns (BE5), village management (BE6) and the management of the historic environment (BE7)</p> <p>No change. This point is acknowledged. Policy NRM4 'Conservation and improvement of diversity' refers to the need to maintain and establish accessible green networks and open green space in urban areas</p>
Infrastructure Provision	<p>The policy should only apply to urban areas with appropriate infrastructure to support growth</p> <p>There is a need to ensure provision of appropriate infrastructure /resources to support further development in urban areas – the policy should include clauses to address this</p>	No change. It is accepted that appropriate infrastructure provision is necessary to secure successful, sustainable development. Policy CC5 'Infrastructure and Implementation' acknowledges that the scale and pace of development will be dependent on there being sufficient capacity to meet the area's current needs and the provision of new infrastructure to meet the needs of new development

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Role of Small Towns/Rural Areas	The policy should not promote further growth in small towns	No change. Some development in small rural towns may be necessary to help strengthen their viability and reinforce their roles. Policy BE5 refers to 'The role of small rural towns (market towns)'
	The policy should give more emphasis to the role of small towns	No change. Policy BE5 refers to 'The role of small rural towns (market towns)'
	More homes should be built in the countryside	Whilst this policy sets an urban focus for the Plan, it is acknowledged that there will be limited, appropriate, development in rural areas (Section B para 5.3-5.6)
Target of at least 60% of all new development on PDL / conversions		
Target	This section should be redrafted to make it clear that this is an overall target for the South East. In some parts of the region, it may not be possible to achieve this, including in the Growth Areas, where urban extensions will be needed	No change. The variation in availability of brownfield land is accepted, however the policy states that this is a <u>regional</u> target
	The target of 60% is not sufficiently challenging - more than 60% of all new development should be sought on PDL and through conversion. Suggestions range from 70% to 100%	No change. The current wording states ' <u>at least 60%</u> '. This reflects national targets. It is also considered appropriate as an overall (average) regional target. In some areas higher percentages will be able to be achieved, but it must be acknowledged that in other areas there is little PDL available and some release of greenfield land will be necessary
Definition of Brownfield/PDL	Some land defined as brownfield land should not be considered as such – for example, gardens and other amenity land	No change. It is considered appropriate to use the Government's definition of previously developed land
Supply of Brownfield Land	The policy does not guarantee development on brownfield land or set out sanctions to developers to secure this	No change. This is not a matter for the regional spatial strategy, but should be dealt with through the development control system
	There is a clear need for monitoring	No change. The policy will be monitored as part of the Regional Monitoring Report
	Have urban capacity studies/other research demonstrated whether there is enough brownfield land available to meet this 60% target?	No change. It is accepted that brownfield land may not be able to deliver the planned levels of development in all parts of the region. The policy sets out that local authorities should use urban potential studies to assess the capacity of their urban areas
	A focus on brownfield land won't provide the range of accommodation needed or deliver sufficient housing	No change. It is accepted that brownfield land may not be able to deliver the planned levels of housing or other development, and the policy implicitly acknowledges that up to 40% of development may need to be located on greenfield land

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Employment Land	The policy should refer to the potential for redevelopment of underused or redundant employment land	No change. This cross-cutting policy does not distinguish between types of previously developed land. Policy RE3 'Employment land provision' highlights the need for local employment land reviews and addresses the issue of loss of employment land
	Urban focus and redevelopment of PDL should not be at the expense of the provision of employment land	No change. The policy already states, in clause (iii), that developments in and around urban areas must be consistent with the principles of sustainable development. Policy RE2 includes reference to the need to retain accessible and well located employment sites where there is a good prospect of employment use
Small Towns/Rural Areas	PDL outside the urban area is also important	No change. Whilst the emphasis of this policy is on an urban focus, the reference to previously developed land does not preclude PDL outside the urban area
Ensure good design and consistency with principles of urban renaissance and sustainable development		
Settlement Patterns	The policy must seek to preserve Green Belt land	No change. Policy CC10a makes reference to retention of Green Belts
	The policy should seek to avoid the coalescence of settlements	No change. Policy CC10a and b makes reference to retention of Green Belts and strategic gaps
	Infill/intensification should not be at the expense of quality of life	No change. See above
Density	There should be a focus on increasing densities in urban areas	No change. Policy H5 refers to housing density, and encouraging higher housing densities
	Densities should be appropriate to the location – good design is important	No change. Policy refers to the need for well designed developments, and this issue of housing density and design is covered in Policies H5 'Housing Density and Design', BE1 'Management for an urban renaissance' and BE2 'Urban and suburban intensification'
Urban Extensions	Where urban extensions develop, there must be positive management plans to safeguard surrounding countryside	No change. The need for positive and sustainable landscape and countryside management is covered in policies C3 'Landscape and Countryside Management' and BE4 'Managing the Urban Rural Fringe'

5.10 Spatial Emphasis – Policy CC8

5.10.1 Respondents were generally supportive of the inclusion of the issues contained in this policy in the Plan. However many commented that the policy required further work to clarify its emphasis and focus. In response to the significant concerns raised, and comments in the Sustainability Appraisal, the policy was removed before Part 1 of the Plan was

submitted, and has been re-drafted (now CC9) placing greater emphasis on the need to address the significant intra-regional disparities in the region, and the relationship between the South East Plan sub-regions and the socio-economic performance of the region. The basic information setting out the sub-regions has been removed from policy and is now set out in separate supporting text, and related issues and policies are addressed in the sub-regional strategies.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Relationship Between Designations and Sub-regions	A number of respondents were concerned that there was a need to ensure greater clarity as to how the designations and sub-regions relate	The revised policy CC9 now focuses on describing the nature of the socio-economic performance of the region by using the sub-regional areas, and sets out action that should be taken in conjunction with the sub-regional strategies
Improving Economic Performance	Some comments received felt that the policy should consider a wide range of approaches to tackle economic disparities/under-performance in the region, and focus on an employment-led approach in regeneration areas	Policy CC9 now identifies the need to address the significant variations in economic performance across the region to help improve socio-economic performance, and a new policy RE5 has been included in the economy chapter that focuses on the specific needs of the 'extremes' of the region's economic performance
Areas Outside Sub-regions	Some respondents commented that the policy approach would undermine areas not in sub-regions, and that there was a lack of rural emphasis in the sub-regions	The sub-regions were identified to address particular policy needs in geographic areas (some including rural areas). The core regional policy framework provides the policy approach for the whole region including rural areas, with reference to specific rural issues in a number of policies. Therefore no specific changes were made in relation to this
Integration with Broader Policy Objectives	Some comments were received relating to the need to show how the issues in the policy integrate with broader sustainable development objectives, as well as other topics including housing	This is acknowledged, and the revised policy CC9 and supporting text seek to help address this in conjunction with the regional policy framework and the sub-regional strategies
Geographic Extent of Regeneration Areas	Some respondents felt that the regeneration areas were too broadly defined	The revised policy CC9 seeks to provide clarity of emphasis, whilst using the agreed sub-regions as a basis to avoid confusion that may have been caused by use of additional designations. It explains that in order to make a difference there is a need for regional partners to work consistently to address poor economic performance over large geographic areas, and that local partners should also ensure that local actions are targeted appropriately

5.11 Green Belts and Strategic Gaps – Policy CC9

5.11.1 The majority of comments supported the importance of protecting the existing Green Belt boundaries, and supported the inclusion of a policy on strategic gaps, with

a smaller number of comments challenging the policy approaches. The comments also highlighted the need to separate the policy into two parts, and consequently the policy has been split into two parts (now CC10a and b).

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Support for Green Belt	The majority of comments were supportive of the clear policy approach, and the view that there was no need for a strategic Green Belt review (apart from possible local reviews, which were generally supported in comments received)	These comments support the approach set out in the Plan. We believe that the degree of commitment to Green Belt given in the Plan also minimises the potential for encroachment of development into these areas
Review of Green Belt	A smaller number of respondents asked for flexibility in the way Green Belt is handled, believing that there may be a need for a strategic/selective review of the Green Belt, including the suggestion that there is a need to build in regular reviews. Views were also expressed that Green Belt should be reviewed to reflect socio-economic needs, and that a caveat be added that encroachment is acceptable where economic benefits, or the benefits of more sustainable patterns of development, would outweigh environmental impacts	The purpose of Green Belt is to provide certainty regarding areas where development should not generally be located, and as such it is not suitable for it to have flexibility, or to allow encroachment for economic benefits
Management	There was a widely expressed view that there is need to ensure investment to better manage the Green Belt, and to realise its potential benefits more fully	We agree with this and hope that through the policy wording and Implementation Plan this will be achieved
Identification of Gaps	There was a divide in views on this policy, ranging from support for the gaps principle and the need to identify gaps, to those who felt that this element of the policy should be deleted and that existing gaps should be removed	We believe the policy is a helpful tool, but that the identification of gaps is best undertaken at the local level through LDDs, in accordance with criteria that are set out in the revised regional policy. The revised policy also allows for small scale development to meet local needs where it will not reduce the integrity of the gap
Structure of Policy	Most comments addressed the issues separately, regarding the two elements of the policy as related but distinct	The policy has been separated to address Green Belt and strategic gaps separately (now CC10a and b)

5.12 Economy

5.12.1 The economic policies in the consultation draft of the Plan were criticised as being insufficiently clear and not reflecting the full range of economic issues that need to be considered. The spatial dimension of the policies was considered to be inadequate. The key changes that have been made are the insertion of two new policies on the spatial dimensions of economic development, and ICT and changing working practices and the combination of two of the consultation draft policies to provide clarity.

5.12.2 The emphasis on sectors/clusters and skills development/training is supported

but needs to be further sharpened, to drive change and delivery harder. The sectors and clusters policy has been revised following the completion of research to provide more specific guidance on how local and regional partners should identify and promote regionally and locally important sectors and clusters. The skills policy has been revised to incorporate some of the more detailed comments made, as well as recently produced regional strategies and revised regional structures.

5.12.3 The key issues raised are listed below. The policy references are to the renumbered policies in the amended version of the Plan.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Context/Overall Structure	Combination of economic policies and tourism in one section is unbalanced	Economy and tourism policies placed in separate chapters
	A number of comments made on the need for a more rounded understanding of smart growth or the need to explore the extent by which economic growth can be achieved by productivity growth rather than physical development	Supporting text revised to include alternative definitions of smart growth and discussions of ways in which it can be achieved
	Comments made on the need for text on links to London	Supporting text added on intra-regional economic performance and links to London
	Little attention given to the importance of the countryside and the rural economy	Supporting text added to outline the importance of the rural economy
Policy RE1: Economic Development	The spatial dimension of the policies is considered inadequate	New policy inserted on the regional spatial priorities for economic and employment growth and link made to overall spatial strategy
Policy RE2: Supporting Regionally Important Sectors and Clusters	A number of comments made that the policy is non-specific and that it is unclear how it will operate	Policy revised following the completion of research to provide more specific guidance on how local and regional partners should identify and promote regionally and locally important sectors and clusters
	A number of comments that regional spatial priorities should be identified	Technical research undertaken identifies spatial priorities. Reference made to this work in supporting text
	Reference should be made to affordable business accommodation for small businesses and start-ups	Box included in supporting text, listing potential interventions at sub-regional or local level which could be made

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy RE2: Supporting Regionally Important Sectors and Clusters (continued)	Need to identify and foster new emerging sectors as well as sectors identified by SEEDA	Revised policy identifies need for local authorities to identify opportunities for development or expansion of sectors or clusters. Supporting text refers to the need for regular reviews to identify emerging sectors
	Reference should be made to, and support for, high-tech industries, science parks, knowledge based industries, logistics and warehousing, the automotive industry, the environmental economy	Supporting text includes reference to these sectors, and lists other key sectors identified in the RES, and Box RE1 sets out potential interventions which could be made
	Reference to the roles of other partners including LSPs should be made	Policy and supporting text now refers to a range of partners, including LSPs
Policy RE3: Employment and Land Provision	Policies on sustainable economic development and supply of employment land overlap	Policies combined to incorporate the need for employment land review from former policy on supply of employment land and criteria from the former policy on sustainable economic development
	Concerns about the loss of employment sites to housing	Policy clarified to state that employment land should be retained where there is a good prospect of employment use
	The policies should set out job growth targets, floorspace figures and strategic employment sites	Revised supporting text clarifies reasons for not including these details in regional policies
Policy RE4: Human Resource Development	Overall support for policy on skills development and training with some comments made that more emphasis is needed on skills development	Supporting text expanded including providing further quantification of skills issues and revisions to reflect revised regional structure and priorities in recently produced statement of regional priorities
	Developments required in the region in higher and further educational establishments still to be defined	Not defined following advice received from SEEDA and the LSCs on the difficulties of doing this
Policy RE5: ICT and Changing Working Practices	A number of comments made on the need to recognise and promote home working, home based businesses, flexible working, telecommunications and changing working practices	New policy added on ICT and Changing Working Practices with cross-reference to policy T4 on communications technology

5.13 Housing

- 5.13.1** While the principle of Policy H2 on housing delivery was accepted by most respondents, there was a strong view that the purpose of the policy was insufficiently clear and did not adequately recognise that local authorities themselves rarely control provision of all necessary infrastructure.
- 5.13.2** The approach to the location of housing – Policy H3 – was broadly supported. However, a number of responses suggested that the policy should better reflect the Plan’s emphasis on the role to be played by the region’s cities and towns, and also housing needs in rural areas.
- 5.13.3** Policy H4 on affordable housing generated a large number of responses and a wide range of views. Although a number of respondents argued that the policy was too prescriptive in terms of the definition and mix of affordable housing and/or that the regional target was not appropriate, the majority were supportive of the approach set out in the draft Plan. A number of comments suggested that more should be done to tackle problems in so-called ‘affordability hotspots’, and that there

should be stronger links between the South East Plan and the Regional Housing Strategy.

- 5.13.4** There was a strong view in the consultation responses that the South East Plan should place greater emphasis on quality. Respondents looked to the housing policies to improve design, reduce environmental impacts, encourage scope for future adaptation and to acknowledge the importance of character, sense of place, amenity, landscaping and public open space.
- 5.13.5** There was a range of views on densities, but with a general support for increased densities, particularly in highly accessible locations.
- 5.13.6** There was support for the approach towards housing type and size, and a call for the South East Plan to address the needs of Gypsies and Travellers.
- 5.13.7** The policy on making better use of the existing housing stock – Policy H7 – was supported, though a number of responses suggested that there should be greater emphasis on the private sector housing stock.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
General	There should be improved cross-references with other sections of the South East Plan	The introduction has been revised to emphasise that there are important linkages between the housing policies and policies elsewhere in the Plan A new Policy H1 and supporting text refers to the sub-regional strategies
Policy H2: Delivering Adequate Levels of Housing	There was a strong view among the consultation responses that the purpose of the policy was not sufficiently clear, particularly in terms of the relationship between the proposed housing allocation strategies and LDDs The consultation responses suggested that the policy should be re-worded to clarify that local authorities themselves rarely control provision of all necessary infrastructure	The policy and supporting text has been revised to emphasise delivery, using the term Housing Delivery Action Plans. The revised policy also emphasises the need for regular review of Housing Delivery Action Plans A minor wording change to Policy H2 has been incorporated to deal with this point. The supporting text has been revised to refer to the range of agencies that would need to be involved in the drawing up of Delivery Action Plans

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy H2: Delivering Adequate Levels of Housing (continued)	The policy should include references to ‘Plan, Monitor and Manage’ and phasing on all sites	A new Policy H1 states that local authorities should adopt a Plan, Monitor and Manage approach to housing provision with appropriate phasing policies in LDDs
Policy H3: The Location of Housing	The policy should better reflect the Plan’s emphasis on the role to be played by the region’s cities and towns A number of consultation responses suggested that there should be greater emphasis on rural housing needs	The reference to villages has been removed from the first part of the policy. The supporting text has also been revised to place greater emphasis on making best use of previously developed land, protecting the countryside and promoting urban renaissance The final part of the policy has been strengthened to emphasise the role to be played by parish plans and local housing assessments in rural areas
Policy H4: Affordable Housing	A number of consultation responses suggested that more should be done to tackle affordability problems in those parts of the South East where the problems are most acute There should be a stronger relationship between the South East Plan and the funding intentions set out in the Regional Housing Strategy	Work commissioned by the Regional Assembly following the consultation concluded that further specific guidance on the provision of affordable housing in those parts of the region with particularly acute problems of access to such housing (so-called ‘hotspots’) would not be helpful. The supporting text has been revised accordingly The same work notes that there is widespread recognition that the provision of affordable housing is complex and unsatisfactory and that there is a role for the South East Plan and the Regional Housing Board in developing a more effective approach to the provision of affordable housing throughout the region. Policy H4 has therefore been extended to require LDDs to provide comprehensive policy and guidance on financial viability and the role of public subsidy in the light of regional advice. The policy change is supported with a new paragraph The supporting text reference to cross-boundary working has been strengthened
	Neighbouring authorities should be encouraged to work together to maximise opportunities for affordable housing	
	Respondents drew attention to the PPG 3 update published in January 2005 which states that affordable housing provision in rural areas should be supported by a rural exceptions policy	The replacement of the word ‘identify’ with ‘promote’ in the last part of the policy allows local authorities to identify sites and to operate a rural exceptions policy
	The reference to the allocation of small sites in rural areas was not sufficiently clear	The inclusion of the word ‘possibly’ clarifies that affordable housing in rural areas will not be acceptable on all land that would not otherwise be released for development

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy H5: Housing Density and Design	There was a strong view in the consultation responses that there should be greater emphasis on high quality design	The policy has been revised to encourage positive measures to raise the quality of new housing, reduce its environmental impact and facilitate future adaptation
	The policy should include references to reducing environmental impacts	
	The policy should encourage scope for future adaptation of housing	
	There was concern that the policy did not acknowledge the importance of character and sense of place and the importance of amenity, landscaping and public open space	Policy BE1 – Management for an Urban Renaissance – has been amended to promote the importance of design excellence within the context of local character to promote distinctiveness and sense of place
		New cross-cutting policy CC12 – Character of the Environment and Quality of Life – advocates active encouragement of conservation and where appropriate enhancement of character, distinctiveness and sense of place of settlements and landscapes
	There should be greater emphasis on higher densities in highly accessible locations	Supporting text revised
Policy H6: Type and Size of New Housing	A number of responses highlighted that the draft South East Plan failed to address the needs of Gypsies and Travellers	The Government's policy framework for planning for Gypsy and Traveller Caravan Sites has been recently published as Circular 01/2006. The circular requires regional spatial strategies, on the basis of local authority Gypsy and Traveller Accommodation Assessments, to determine a strategic view of needs across the region and identify the number of pitches required for each local planning authority
		The South East Plan has been revised to incorporate an interim statement indicating that an early partial review of the South East Plan will be required in the light of local Gypsy and Traveller Accommodation Assessments to provide a strategic view of needs across the region and to identify the number of pitches required for each local planning authority. In order to facilitate an early partial review of the South East Plan, it is imperative that local authorities undertake their Gypsy and Traveller Accommodation Assessments as soon as practicably possible
		Policy H6 and supporting text has been revised to include a specific reference to the needs of Gypsies and Travellers

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy H7: Making Better Use of the Existing Housing Stock	There should be greater emphasis on the private sector housing stock	The first part of the policy has been re-worded to clarify that local authorities should assess the whole housing stock and not just the homes in the local authority sector The supporting text has been revised to emphasise the potential for re-use and adaptation afforded by the existing housing stock

5.14 Communications and Transport

5.14.1 The transport section of the South East Plan forms the Regional Transport Strategy (RTS). This is an integral but specific section of the plan addressing the needs of the region in terms of transport policy and delivery. The RTS in the Plan is largely based upon the RPG9 revision published by the Secretary of State in July 2004. The policies adopted in 2004 were drafted

with a view to a longer-term time horizon; hence the draft consultation version of the Plan included the policy framework from the July 2004 version, and requested response on how this framework may need adaptation.

5.14.2 Following consultation on the draft Plan a number of key issues were identified, which are summarised below. The version of the RTS submitted to Government in March 2006 reflects these comments.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Strengthening Framework	Number of comments and detailed suggestions on how to strengthen the existing framework, almost no dissent from general approach	Policy text has been revised to make responsibility for implementation clearer and expectations of delivery sharper For example replacement in a number of policies with 'must' rather than 'should'
Coherence with Rest of South East Plan	Need to reconsider how the present RTS fits with the rest of the Plan, need for reformatting to show how this is being supported	Policies have been revised and combined where possible to: <ul style="list-style-type: none"> • Provide stronger single integrated policies (eg amalgamation of old T1 and T2 into a single policy) • Provide greater ties to overall spatial policy direction • Update changes in role (eg demise of SRA) • Reduce overall number of policies so better fits with Plan as a whole
Updating Investment Tables	Need for comprehensive updating of investment tables once transferred to Implementation Plan	Some elements of the investment tables have been combined into the Implementation Plan. The tables have however to some degree been superseded by changes to process and the Regional Transport Board functions

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Map Alterations	Number of suggestions for adaptations or changes to Maps T1 and T2	Number of changes have been made to T1 and T2, for example the indication of new international hub at St Pancras and Kent International Airport. Also a number of new transport hubs have been developed through the sub-regional strategies
Parking Standards	Number of comments on parking standards and the need for these to have flexibility at the local level, also the need for these to be consistent with policies outside the region (principally London). Need to pick up provision of rail station parking need	Policy does have flexibility, whilst urging local authorities (specially those in hubs) to reduce below this level. Research has been undertaken into the implementation of this policy and into cross border issues, and found that the majority of authorities are in compliance Policy adapted to include a specific reference to station parking
Air Policy	Some criticism of standpoint taken on airports white paper in supporting text	Changes to text reflect the results of further research on airports which supports maintaining the current policy on airports
Communications Policy	General support – although need for more detail	Policy has been revised to take on board specific comments through consultation process, and linked with economy section
Implementation	General comment on need to provide greater direction on how to implement the policies and principles of the RTS and where different emphasis may lie across the region	Decided that this was not within the policy framework, rather it is implementation. Work is being undertaken through the Implementation Plan, the work of the Transport Advisory Group, and the work of the Assembly as a whole to enable implementation of the policy framework over a number of topics (eg Mobility Management Toolkit, and Regional Freight Strategy)
Cross-Referencing to Environmental Issues	Need to pick up, or include greater cross referencing, to some environmental issues related to transport (eg noise, air pollution etc)	Cross referencing has been increased. In particular reference to Natural Resource Management chapter included in opening text
Freight	A number of issues were raised about the resilience and outcome of the freight policies	Work to revise the policies as part of work on Regional Freight Strategy is underway as a matter of priority
Travel Plans	Need to highlight the increased role of Travel Plans	Policy reinforced for types and levels of development where plans should be required

5.15 Sustainable Natural Resource Management

5.15.1 The majority of responses supported the Sustainable Natural Resource Management

policies, although some commented that the policies should be strengthened to require greater resources efficiency and environmental protection. The key issues raised are detailed below.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy NRM1: Sustainable Water Resource, Groundwater and Water Quality Management	<p>Concern was expressed that water supplies are currently struggling to cope with demand and future development would cause water shortages</p> <p>Development needs to be phased with the provision of water infrastructure. Concern was expressed that unless there is substantial investment in water infrastructure, development would be constrained</p> <p>NRM1 should place greater emphasis on water efficiency</p> <p>NRM1 should stress the importance of groundwater protection</p> <p>Terminology in NRM1 should be corrected/ accuracy improved</p> <p>More reference should be given to the Water Framework Directive (WFD) as many areas are identified as being at risk of not complying with WFD. Development must not prejudice ability to achieve "good ecological status" in the region's water bodies</p>	<p>The water management policies are based on water supply and demand balance models developed by the Environment Agency and water companies. The Plan takes a twin track approach of demand management and water resource development</p> <p>Clause added to NRM1 to ensure that the rate and location of development does not lead to unacceptable deterioration of water quality and is in step with current and planned provision of adequate water supply, sewerage and wastewater treatment infrastructure capacity</p> <p>Clause iii on water efficiency was strengthened and now includes requirement for development to incorporate measures to achieve very high levels of water efficiency reflecting current best practice including BREEAM "very good" and increasingly "excellent" standards</p> <p>The title and wording of NRM1 was changed to include reference to groundwater to reflect its importance to the region (70% of public water supply) and vulnerability</p> <p>Wording changed to give the correct or more accurate terminology eg the term 'water efficiency' was changed to 'demand management', and 'waste water' to 'sewerage'</p> <p>Policy NRM1 now requires local authorities to ensure compatibility with River Basin Management Plans developed under the Water Framework Directive when preparing Local Development Documents and determining planning applications. River Basin Management Plans will be developed by the Environment Agency over the lifetime of the Plan (in place by 2010) as part of the implementation of the WFD</p>
Policy NRM2: Strategic Water Resource Development	Broad locations for reservoir schemes listed in para 1.33 of the draft South East Plan could be included in policy NRM2 rather than supporting text	Policy NRM2 was amended to include the list of major reservoir schemes and to require LDDs to allocate and safeguard the sites identified

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy NRM2: Strategic Water Resource Development – continued	NRM2 should identify additional water resource schemes such as bulk transfers, effluent reuse and desalination	Additional resource schemes listed
	NRM2 should refer to specific alternatives to resource development including demand management	Clause ii refers to the consideration of alternative options and now includes specific reference to water efficiency in new and existing properties
Policy NRM3: Sustainable Flood Risk Management	NRM3 repeats PPG25 and is therefore unnecessary	A reference to PPG25 has been included as this it provides detailed guidance, however NRM3 does not repeat PPG25 it gives additional guidance which is specific to the South East
	NRM3 should give greater spatial guidance	More spatial detail will be provided by Catchment Flood Management Plans, the policy already requires that these plans should be taken into account
Policy NRM4: Conservation and Improvement of Biodiversity	NRM4 should be strengthened by deleting "seek to"	The wording "seek to" has been deleted
	Amend NRM4 to support the protection of county and locally designated sites	Clause ii now includes reference to county level wildlife sites
	NRM4 should refer to the maintenance as well as the creation of green networks	Policy amended to refer to the maintenance as well as the creation of green networks
Policy NRM5: Woodlands	Amend NRM5 to include reference to the recreational value of woodlands	Policy wording has been amended: Clause ii now states: promoting the effective management, and where appropriate, extension and creation of new woodland areas, including in association with areas of major development, where this helps to restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, helps mitigate climate change and contribute to floodplain management
	NRM5 should refer to the role woodlands play in mitigation	
Policy NRM6: Coastal Zone Management	Additional criterion should be added to protect and promote opportunities for participation in sport and active recreation	Additional wording added to clause iii, now iv, to protect cultural and recreational resources
	Concern that mechanisms and roles for implementation are clear	This will be addressed in the Implementation Plan
Policy NRM6:	There should be some reference to the importance of conserving and enhancing the landscape character of coastal zones	NRM6 amended to refer to the character of the coast
Policy NRM7: Air Quality	NRM7 should be strengthened to address the impact of transport infrastructure on air quality	Additional clause included to reduce the environmental impact of transport through traffic and congestion management, and support the use of cleaner transport fuels
Policy NRM8: Noise	Tranquil areas and the impact noise has on these areas should be identified	This is an issue for local planning rather than regional planning

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy EN1: Development Design For Energy	The need to strengthen EN1 to require higher standards of developers was raised, it was also suggested that a policy requiring 10% renewable energy for all development projects was included. However others commented that the policy should not place too many restrictions on developers	EN1 was amended to include a specific target to require developers to provide at least 10% of the development's energy demand from renewable sources for housing schemes of over 10 dwellings and commercial schemes over 1,000m ²
	EN1 should focus on energy demand/ energy efficiency ie persuading occupants of existing buildings to conserve energy and requiring future development to be more efficient	EN1 already encourages developers to attain high energy efficiency ratings in all new development, where appropriate, through the use of best practice guidance such as Building Research Environmental Assessment Method (BREEAM) and the National Home Energy Rating (NHER)
Policy EN2: Combined Heat and Power	In relation to EN2 some commented that local authorities should require developers to submit details of Combined Heat and Power (CHP) for larger developments or justify why CHP would not be viable. Other comments warned that there is a danger that this policy could be taken considerably further in LDDs and lead to policies which require developers to incorporate CHP proposals	The integration of CHP is not a statutory requirement so a encouraging policy is appropriate
Policy EN3: Regional Renewable Energy Targets	EN3 should include more challenging targets for renewable energy supply	Policy EN3 has already been through Examination in Public and adopted
Policy EN3 & EN4: Regional and Sub-regional Energy Targets	Although these policies were supported by many respondents, some expressed concern that the setting of targets may lead to inappropriate development	Guidance is provided in these policies
EN5 & EN6: Renewable Energy Development	Comments for renewable energy schemes to be based on landscape character assessment	This policy was adopted following Examination in Public. It has been agreed that landscape character assessment should not apply to all developments in all locations. EN5 states that within National Parks, Areas of Outstanding Natural Beauty and on Heritage Coasts, development should generally be of small scale or community-based, with location and design informed by landscape character assessment
Policies EN1 – EN6	Energy efficiency targets and other sustainability measures need to be applied flexibly	Comment to be addressed in the Implementation Plan
	Comments received concerning the difficulties associated with renewable energy schemes, especially environmental impacts and the need for schemes to be subject to environmental impact assessment	Concerns noted and many of the policies include relevant clauses
	Responders suggested the Plan should investigate renewable energy schemes in specific areas	Issue to be addressed locally

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Soils	Soil conservation is not adequately addressed by the Plan	It is unclear what regionally-specific policy is needed. This will be kept under review
Light	There should be a policy for addressing light pollution within the Plan	This is a local rather than a regional issue
Geology	There is no mention of Geological Conservation Review Sites or of Regionally Important Geological Sites and geology should be taken into account as it is one of the prime factors controlling the location of settlements	There is no need to repeat national policy
Green Infrastructure	The Plan should adopt an approach similar to the East of England RSS, and particularly policies ENVI and 2, that plan for a green infrastructure model	To be included in Implementation Plan
Impact Assessment	Development proposed in the Plan will have a negative impact on the environment and wildlife. Requests for a clear assessment of environmental impacts of all growth options	Key points included in section D5 and sustainability appraisal
River Thames	Greater recognition should be given to the biodiversity value of the River Thames Green Corridor, and its strategic potential in sustaining and enhancing the quality and variety of the region's environment	Covered by regional policies on natural resource management and Countryside and Landscape Management

5.16 Waste

5.16.1 The Consultation Draft South East Plan January 2005 included waste policies as set out in the Proposed Alterations to RPG9 (March 2004).

5.16.2 Given the advanced stage of the review of this part of RPG9 (the Examination in Public (EiP) took place in October 2004 and the Panel report published in December 2004), comments were not invited on these policies. However, a number of comments were received, and these are summarised below.

5.16.3 The waste policies in the Draft South East Plan have been amended to reflect the Government's Proposed Changes to the Waste Strategy (August 2005). One further amendment has been made to W13, to reflect a methodology for re-apportioning waste exported from London.

5.16.4 Overall, changes to the wording of policies are minor, with most changes recommended to add clarity rather than change emphasis or direction of policy. The number of policies has been reduced from 20 to 17 through deletion of advocacy clauses and policies, and merging of policies W17 and W18 (location of waste management facilities).

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Waste Reduction (Consultation draft W1 and W2)	Comments from a large number of respondents related to including a more ambitious target to reducing the overall growth in waste. Possible delivery mechanisms were also given, for example focusing on reducing packaging, using financial incentives or penalties and the promotion of new technologies	The waste reduction targets are already ambitious but realistic. New technologies are promoted in the waste policies. Other suggestions noted
Regional and Sub-regional Self Sufficiency (W3 and W4)	Some respondents commented that these policies include unacceptable provision for transportation of waste between London and the sub-regions. Others commented that the disposal of waste from adjoining regions should be balanced against the quality of life in the region	The policies promote declining exports of waste from London but reflect London's lack of landfill space. The comment regarding balancing the disposal of waste against the quality of life in the region was taken into account in the reduction in exports of waste from London and in the apportionment methodology
Targets for Recovery and Diversion from Landfill (W5)	Comments on W5 state that there is a need for additional funding to meet targets in landfill reduction and increases in recycling. Other comments relate to energy from waste. Some comment that energy from waste needs to be one of the waste management options available, while others comment that there should be no incinerators in the region. Comments also noted that more research is required in to energy from waste to ensure that it is beneficial	Concerns on funding noted. Research has been undertaken at a national level, energy recovery is higher in the hierarchy than landfill. Energy from waste is included in the mix of waste management measures and policies
Landfill (W13)	Comments made in relation to W13 expressed a concern that landfill capacity is too low and that the real requirement will be twice the amount envisaged. It was also commented that the practice of landfilling must end	Capacity studies undertaken to indicate current and forecast picture. Some areas will have shortfalls in landfill Waste management policies are based on minimising landfill
Location of Facilities (criteria & locations) (Consultation draft W17 and W18)	Specific comments were received on the criteria in W17 In relation to the use of the 'proximity principle' in W18; it was suggested that the proximity principle should not be the sole determinant of the location of waste facilities and others suggested that the proximity principle should be removed from the policy to prohibit landfill sites being located on AONB and National Parks. The objection to the inclusion of Areas of Outstanding Natural Beauty (AONB) as possible locations for waste management was made by a number of respondents. It was also suggested that the effect of this policy on Green Belt, National Parks and AONB must be carefully monitored	Policies W17 & W18 have been merged to form the revised Policy W17. The policy reiterates that waste management facilities should not be precluded from Green Belt, and exceptionally Areas of Outstanding Natural Beauty and National Parks, but adds further qualifications including that development should not compromise the objectives of these designations. The supporting text identifies types of facility that will be needed and which may need to be located in these areas including construction and demolition recycling, civic amenity and recycling sites, in-vessel composting, anaerobic digestion, and transfer stations

5.17 Countryside and Landscape Management

5.17.1 Most comments were supportive of the policy approach, but some questioned

whether it was robust enough to ensure the on-going protection and enhancement of the region's countryside, whilst others emphasised the need to ensure social and economic needs were also addressed.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
General	<p>Most respondents were supportive of the emphasis in this chapter, but there were also a range of specific comments:</p> <ul style="list-style-type: none"> • Clearer links should be made to chapter D5/policies on conservation and biodiversity • There is too much emphasis on designated/protected areas – more is needed on wider countryside and the importance of protecting countryside 'for its own sake' • Concern that the chapter does not recognise local designations or landscapes of sub-regional significance • AONB and National Park cover 35% of the region – incorrect figure included in supporting text • Need to recognise that local needs may require development and change, and there may be some negative implications of designations/protection of landscape for service provision, especially in deprived areas • Include Heritage Coast on Map CLM1 • Chapter needs a new policy on agriculture • Should make reference to wider benefits of countryside – health; recreation; access/PROW; tourism/visitors; economic • Refer to climate change effect on landscape and adaptation needed 	<p>Changes were made to correct factual issues</p> <p>Additional text has been added to the introductory sections of the Plan to strengthen the interlinkages with other policy areas, and highlight the importance of the region's rural areas and countryside</p> <p>The policy approach addresses all parts of the region's countryside, and it is more appropriate for LDDs and other strategies to address the issue of local designations, in keeping with PPS7</p> <p>Taken together, policies in the Plan seek to address socio-economic issues, as well as the importance of protecting the landscape</p> <p>Heritage coasts are a non-statutory designation, and are covered under the policy approach for undeveloped coastline in NRM6</p> <p>The policies do emphasise the role of farming in shaping landscape in the region, and additional supporting text has been added reflecting the importance of this sector</p> <p>Additional policy has been added (C4) addressing PROW issues</p> <p>Climate change is covered as a cross cutting policy</p>
The New Forest National Park, and the Proposed South Downs National Park	<p>Comments were generally supportive of the policy approach to the New Forest National Park, but comments also expressed concern about the lack of policy for the South Downs:</p> <ul style="list-style-type: none"> • Should address impact of activity around the park on the park, and strengthen protection of land providing setting for, or with a functional relationship with, the park • Should refer to 'conserving and enhancing' rather than 'protecting and conserving' (as per national guidance) • Some factual rewording of supporting text required to update on position re National Park Authority • Need for holding/provisional policy re possible designation of South Downs National Park 	<p>It is appropriate for the policy focus to remain primarily on the land within the park boundaries as in the consultation Plan</p> <p>The policy already includes the issue of land with a functional relationship with park for grazing, but on balance it is not appropriate to extend this scope any further</p> <p>Supporting text has been reworded reflecting the latest position on the designation process</p> <p>A new policy has been added providing an interim policy for the South Downs</p>

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Areas of Outstanding Natural Beauty	<p>Responses were generally supportive of the inclusion of this policy, but with strong concerns around the wording re relative level of protection:</p> <ul style="list-style-type: none"> • AONBs have the same level of protection as National Parks in Government guidance, so text and policy should be amended • Should refer to AONB contribution to wider quality of life, distinctiveness and economy of the region • Need reference to statutory AONB Management Plans • Should also address protection of land providing setting for, and functional relationship with, AONBs • Check for accuracy re number of AONBs in region, and map CLM1 • Suggestion that boundaries of AONBs should be reviewed 	<p>Wording strengthened to reflect status of AONBs</p> <p>Importance of AONBs is acknowledged in wider statements that recognise the importance of all the countryside/ landscape in the region</p> <p>Policy reworded to include reference to Management Plans</p> <p>Policy has been reworded to include need to have regard to AONB setting.</p> <p>AONB map has been checked for accuracy</p> <p>There is no case for reviewing the boundaries as these are set nationally and is outside the scope of the Plan</p>
Landscape and Countryside Management	<p>Responses were generally supportive of this policy, but with some specific suggested alterations:</p> <ul style="list-style-type: none"> • Refer to social and economic benefits of good countryside management • Should refer to possible impact of Common Agricultural Policy (CAP) reform and resource, employment and economic development implications 	<p>Policy has been reworded to reflect a broader range of benefits</p> <p>Wider issues regarding CAP reform are now set out in additional supporting text</p>

5.18 Management of the Built Environment

5.18.1 Common issues raised by consultees on section D7 were as follows:

5.18.2 There was a large number of responses emphasising the need for new development to respect the historic and landscape character of existing towns and villages, and that further guidance should be provided on this issue within the Plan.

5.18.3 A significant number of organisations and individuals felt the Plan placed insufficient emphasis on the protection and enhancement of the region's important historic assets.

5.18.4 There was a mixed response in relation to the appropriate nature and scale of

development in small towns and villages. There were strong representations from all sides, with many expressing the view that rural communities would benefit from moderate levels of growth to enhance their vitality and viability. Others suggested that development in villages and small towns should only proceed where there is evidence of local need and the proposed development would not harm the local environment.

5.18.5 A number of local residents expressed the view that the plan places too much emphasis on new build and there is a danger of urban sprawl and coalescence as a result.

5.18.6 The proposals relating to the Urban Rural Fringe received probably the largest number of responses in this section of the Plan. The potential for conflict with national

planning guidance on Green Belt was a particular concern.

5.18.7 The section has been redrafted to incorporate an additional policy providing guidance on the intensification of

residential areas. All other policies have been amended to address key issues raised through the consultation. The supported text has also been edited to avoid duplication.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
BE1 – Management for an Urban Renaissance	There was general support for this policy but some concern about the failure to acknowledge the importance of a sense of place / cultural identity and the role of urban green space in securing an urban renaissance. There was no consensus on whether the Plan should include guidance on design issues	Policy amended to promote the importance of design excellence within the context of local character to promote distinctiveness and sense of place New cross-cutting policy CC12 – Character of the Environment and Quality of Life – advocates active encouragement of conservation and where appropriate enhancement of character, distinctiveness and sense of place of settlements and landscapes
BE2 – Managing Neighbourhood Change	There was general support for the principles advocated by this policy but a request for further details about how it would be implemented A common theme emerging from the responses was the need to protect character in existing settlements and the overall quality of residential areas The proposal that authorities should be proactive in identifying opportunities for sustainable development in the urban-rural fringe, including urban extensions, was strongly opposed by many individuals. A significant number identified the potential for conflict with Green Belt designations and requested that this be addressed within the Plan. Some responses suggested that the circumstances under which extensions would be permissible should be made clearer and others suggested that criteria for defining urban-rural fringe should be included in the Plan to inform LDF preparation It was suggested by some respondents that ‘Cultural Legacy’ should be included as an additional function of the urban-rural fringe	Renamed policy (BE3 – Suburban Renewal) and supporting text revised to provide further clarification New policy (BE2 – Urban and Suburban Intensification) requires local development documents to take a proactive approach to the provision of design guidance based on local character appraisal Policy amended to acknowledge implications of Green Belt designations. Definition of urban rural fringe to be identified through Local Development Documents Functions of urban-rural fringe have been amended to include ‘Cultural Legacy’
BE4 – The Role of Small Rural Towns (Market Towns)	Overall there was a high level of support for this policy. A small number of respondents questioned the definition of ‘Market Town’ employed in the Plan	No change. Definition employed is consistent with national guidance

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
BE4 – The Role of Small Rural Towns (Market Towns) – continued	Some organisations wished to see the reference to ‘small scale housing development’ removed, as it is too restrictive. Others considered that limiting development in these areas could potentially lead to social and economic problems	Policy amended to emphasise need for LDDs to support the role of small towns as local hubs for employment, retail and community
BE5 – Village Management	Widespread support for development that meets local needs, with the exception of some organisations that interpreted the policy as precluding the development of market housing	Policy amended to advocate community led local assessments of need and action planning to inform decision-making
BE6 – Management of the Built and Historic Environment	There was considerable support for strengthening the Plan’s emphasis on the protection and enhancement of the region’s historic landscape and character. Some respondents requested explicit reference to characterisation as a method of managing change	Character assessment acknowledged as a useful tool to inform local policy development. New Policy CC12 strengthens the Plan’s approach to conservation and enhancement of character, distinctiveness and sense of place

5.19 Town Centres

5.19.1 The need to differentiate between different town centres in the provisional list of town centres and comments on which centres should be included in the strategic network of town centres were the key issues on town centres. The overall network proposed was supported but there were calls to give a hierarchy rather than a list. The centres designated as regional hubs and the research carried out by DTZ were used to identify primary centres. The research by DTZ and ODPM’s town centre statistics were used to consider if the centres suggested were

of sufficient scale to be included in the strategic network.

5.19.2 The policies were criticised for giving an insufficient steer on which centres have potential for growth or the changes in emphasis needed. Additional supporting text has been included on the strategy for a balanced network of centres for each sub-regional strategy area, including reference to the five centres which do not fall within the sub-regions.

5.19.3 The key issues raised are listed below. The policy references are to the renumbered policies in the amended version of the Plan.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy TC1: Development of Town Centres	Links to the built environment policies and specifically the small rural towns needed Policy restates national policy and reads as a visionary statement	Cross-references to other sections of the plan improved and specific reference made to policy BE5: The Role of Small Rural Towns Policy revised to make it regionally specific whilst still setting out overall strategy and to read as a policy requirement

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Policy TC2: Strategic Network of Town Centres	There is no differentiation between different town centres in the provisional list of town centres, and more of a hierarchy than a list should be given	Division of list of town centres into primary and secondary regional centres in line with requirements in PPS6. Primary regional centres include all the centres designated as regional hubs and a further six centres identified as major centres from research carried out (by DTZ for the town centre task group)
	Mixture of comments made about the inclusion of Bluewater and Ebbsfleet in the network of town centres, some welcoming their inclusion and some suggesting they are removed	Bluewater/Ebbsfleet included as a combined centre. The development of the retail role at Bluewater, alongside housing development at Western Quarry and development of a service centre at Ebbsfleet is seen as a new centre
	Mixture of comments made about town centres that should or should not be included in the network of town centres, including suggesting that Westwood Cross, Thanet, Sevenoaks, Farnborough, Wokingham and Burgess Hill should be included	List of secondary regional centres revised in light of comments received, the research conducted by DTZ and ODPM's town centre statistics, to consider if the centres are of sufficient scale to be included. Sevenoaks, East Grinstead, Farnborough and Haywards Heath added and Margate, Southsea, Bognor Regis and Walton-on-Thames removed from strategic network
	The policies on the regional network of town centres, sub-regional town centres and retail overlap and need to be merged	The policy on sub-regional town centres (policy TC3 in the consultation draft – January 2005) deleted and key points incorporated into revised policy TC2 and TC3
	Clarity needed on who should undertake town centre assessments	Change made to policy wording to make it clear that local planning authorities will carry out regular assessments of town centres in the network
Policy TC3: New Development and Redevelopment in Town Centres	Stronger steer should be given as to where major activity and development is likely to take place	Supporting text included on the strategy for the development of a balanced network of centres for each sub-regional strategy area, including reference to the centres which do not fall within the sub-regions
	Commercial, office and leisure sectors are not adequately addressed	Supporting text included which states that further work is needed
	Mixture of comments on promotion of public transport, walking and cycling and that car restraint policies have a negative effect on town centres	The need to minimise reliance on the car and promote public transport accessibility included as a clause within the policy
Policy TC4: Creating and Supporting Town Centres	Policy conflicts with national policy on the sequential approach and clarity is needed on the approach on out-of-town developments	Reference to PPS6 removed from policy statement, changes made to clarify that the sequential approach should be followed and text added on out-of-town developments
	Policy cannot be given on allocation of budgets	Text in policy (part iii in the consultation draft – January 2005) moved to supporting text as not appropriate for policy to make budget recommendations

5.20 Tourism and Related Sport and Recreation

- 5.20.1** The consultation draft South East Plan stated that the Assembly was not seeking further consultation on the tourism policies, all of which had passed through a public examination in 2003 and were adopted as alterations to RPG9 in November 2004.
- 5.20.2** Nevertheless a number of responses were received. Although there was considerable support for many of the policies, and a view that the tourism policies should be included in the Plan as a separate section, there was a widespread concern that there should be a stronger emphasis on sustainable tourism. Some responses were more specific; arguing that specific policies should be environment-led or include additional references to regionally significant environmental attractions/

features (eg country parks), or additional environmental criteria.

- 5.20.3** Some interest groups take the view that the Plan gives insufficient attention to recreational boating and that specific policies are needed to protect infrastructure and promote additional facilities. A small number of respondents seek a specific reference to the horseracing industry.
- 5.20.4** The consultation draft included additional explanatory text on regional casinos, a form of development for which no specific guidance is provided in the recently approved alterations to RPG9. Responses on this issue were limited in number.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
TSR1: Coastal Resorts	Very few specific comments received on this policy. Received general support	Noted. Linkages with Policy CC9 acknowledged in revised draft
TSR2: Rural Tourism	Although a number supported the encouragement of rural tourism, others took the view that this policy could lead to an unacceptable erosion of the countryside, and it may conflict with other policies in the Plan on Green Belt, countryside and landscape management. They advocated that the policy should be environment-led. Others took the view that the policy was unnecessary as its objectives were sufficiently met by other policies in the Plan	Other policies in the Plan, notably CC10a, C1, C3 and C3 address Countryside and Landscape Management and complement TSR2. Policies should not be applied in isolation
TSR3: Regionally Significant Sports Facilities	Environmental impact associated with regionally significant sports facilities is a concern. Some argue that the policy should include sustainability criteria. One respondent suggested that one such criterion would be that such development should not occur in designated landscapes	This policy should not be applied in isolation; other policies in the Plan should ensure that any proposals do not conflict with sustainability objectives

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
TSR4: Tourism Attractions	<p>General concern that this policy fails to recognise that the natural environment of the South East is its biggest attraction. The suggestion was made that the policy should state that such development should not occur in designated landscapes, and the need for improved countryside access through Right of Way Improvement Plans</p> <p>Some support for TSR4 being applied to regional casinos, but also a desire to see more specific locational guidance, though no consensus on what this should be. Southampton was the only suggested location put forward for a regional casino</p>	<p>Countryside and Landscape Management policies should prevent inappropriate development of any type occurring in designated landscapes</p> <p>New policy C4 added to specifically encourage access to the countryside through Rights of Way Improvement Plans</p> <p>Text reworded to confirm that Policy TSR4 applies to regional casinos</p>
TSR5: Tourism Accommodation	Very few comments received. Equally split between broad support and concern that the policy is too pro-development	Noted. No change
TSR6: Visitor Management	One respondent suggested this policy should be deleted as local authorities are no longer required to produce tourism and cultural strategies, and that it is inappropriate for development plans to cover visitor management issues. Plan should give greater attention to visitor management of large events as distinct from visitor attractions	Not accepted. Visitor management seen as a relevant issue for a spatial strategy. Management of large events is covered by existing policy
TSR7: Priority Areas for Tourism	Limited responses. A small number reject the notion of priority areas as ill conceived. Others advocate additional reference to National Parks and AONBs as distinct priority areas for visitor management	Priority areas are identified to provide a sub-regional emphasis to the overall spatial strategy for tourism, reflecting the variation in tourism pressures across the region. Importance of visitor management in National Parks and AONBs is addressed in Policy TSR6

5.21 Social, Cultural and Health Dimensions

5.21.1 Most comments were supportive of the

inclusion of the social-related policies in the Plan. However there were a number of comments that suggested strengthening the policy content further.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Crime and Social Problems	Crime and social problems should be addressed	No changes have been made specifically to this as the Plan does not have a direct remit to address these issues, although it is hoped that the Plan's policies could overall have a positive effect on social cohesion in the region
Community Infrastructure	Need to provide a stronger emphasis on community facilities/infrastructure to provide services and provide focus for the community, and include places of worship as an important part of the infrastructure	This is covered in Policy S7, and also the Plan's strong emphasis on infrastructure provision, and places of worship has been added to supporting text

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Health Issues	Coverage of health issues is very important, and the policy approach needs clarifying. The Health Impact Assessment approach should be promoted	These issues are addressed through revised policies and supporting text
Rural	Rural proofing of the chapter is required, and rural social exclusion should not be overlooked	These issues have been addressed through revised policies and supporting text
Regional Spatial Specificity and Focus	The policies need to be targeted better and have greater regional specificity	We have sought to address these concerns in revisions to policies and supporting text, and the Implementation Plan will set out how they are delivered
Reducing Disparities	Policy S1 is too vague and will not deliver the wider improvements required	Policy S1 has been revised to focus more clearly on social inclusion, and revised Policy CC9 now also provides strong cross-cutting support on this issue
Education	Need to ensure suitable education facilities are developed	This issue has been strengthened in revised policy and supporting text
Sports Facilities and Recreation	Policies should address the need for sports facilities, and the role of green space in recreation, which can improve health	These issues are addressed through the policies on culture and on supporting healthy communities

5.22 Implementation Plan

5.22.1 The importance given to the implementation of the policies of the South East Plan and the delivery of critical infrastructure is generally acknowledged. However, there is widespread concern about the delivery and the timing of such infrastructure in relation to planned levels of growth in South East England; many felt that a package of pragmatic measures for resolution should be identified in this respect.

mechanisms. Finally, the respondents would like to see a wider range of infrastructure (other than transport) being considered, as well as the sub-regional dimension of this being given greater consideration.

5.22.2 The Implementation Plan also needs to clearly define the key delivery agencies and their role; similarly, it will need to identify more precisely the various sources of funding and potential new delivery

5.22.3 The final version of the Implementation Plan will address most of the issues raised. It will be more focused and will clearly set out key delivery agencies (and their role), different funding streams and new delivery mechanisms. It will incorporate sub-regional aspects of implementation and will focus on a wider range of infrastructure types.

5.22.4 The linkage between the Implementation Plan and the Monitoring Framework will be reinforced in order to establish an effective framework for tracking the progress of infrastructure delivery.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Implementation and Delivery	There is a need for clarity on responsibilities of key delivery agencies	Implementation Plan will include text outlining roles and responsibilities of key delivery agencies

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Delivery Mechanisms	References to a wider range of delivery mechanisms should be made in the Implementation Plan	These will be added to relevant implementation table and/or supporting text
Funding Sources	The Implementation Plan should identify more clearly the key sources of funding	The Implementation Plan will be amended to identify key sources of funding
Range of Infrastructure	The Implementation Plan should include indication of the full range of infrastructure required, not just transport	The Implementation Plan will include reference to the different forms of infrastructure
Sub-regional Strategies	The Implementation Plan must consider in detail how the sub-regional strategies will be delivered	The Implementation Plan will be updated in light of sub-regional advice
Conditional Investment	The Implementation Plan should be robust and planned levels of development should be conditional upon required investment being securely in place	A general concern that will need to be addressed in the Implementation Plan
Sufficient Funding	Sufficient funding to support the Plan and to deal with existing shortfalls should be emphasised	A general concern that will need to be addressed in the Implementation Plan

5.23 Indicators and Monitoring

- 5.23.1** There were 78 comments on Indicators and Monitoring in total, the majority of which came from Environmental Groups (21) and Private Individuals (16).
- 5.23.2** Most of the comments were related specifically to indicators. The poor quality

of proposed indicators was commented on, while others suggested inclusion of specific indicators. The lack of indicators relating specifically to the countryside, AONBs and National Parks was commented on several times. The remainder of comments focused on the overall monitoring framework.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Indicator Quality	Object to the poor quality of indicators	Key point will be considered in review of indicators
Additional Indicators	Countryside indicators and those specifically relating to AONBs and National Parks are an omission	Key point will be considered in review of indicators. Data on this subject is difficult to source on a consistent regional basis. The Countryside Agency's State of the Countryside provides a specific countryside related annual monitor
	Suggest addition of specific indicators	Some of these are covered by the national core set issued by ODPM. Others are inappropriate at the regional level or too difficult to monitor because of a lack of robust data at an appropriate level
	Social indicators need to be included	Difficult to define and source data for. The IRF covers aspects of social monitoring to a degree

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
IRF Indicators	Suggested amendments to table BI (IRF objectives and indicators)	Not accepted. Key point relates to the IRF which is not open for consultation, therefore no action required
Links to Targets	Need clear links between targets and indicators and set guidelines on an established monitoring regime	Key point included in Implementation Plan and Monitoring Framework

5.24 Sustainability Appraisal

- 5.24.1** The main thrust of the comments was that elements are missing and that the Sustainability Appraisal (SA) is not robust. The quality is questioned. However, there is also a considerable amount of comments welcoming the document.
- 5.24.2** Many of the omissions will be addressed later, as the information is currently not available. Examples of these are the

cumulative impacts, mitigation measures, monitoring mechanisms and a more detailed sub-regional appraisal.

- 5.24.3** Some of the comments are not accepted by ERM – the consultants who carried out the Sustainability Appraisal. Examples of these are that the evidence base is inadequate, that the appraisal indicates an overall negative impact of the Plan and that the appraisal objectives are not the most useful ones.

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Evidence Base	The evidence base is inadequate/more rigorous and detailed analysis is needed	The SA/SEA has used the best publicly available information to carry out the assessment and has drawn on considerable inputs from regional stakeholders. The process for integrating the ongoing findings of the SA/SEA is iterative. Further details can be provided by the Assembly and this process will be documented in detail in the final assessment report
Sub-regional Appraisal	The appraisal of the sub-regions is not adequate	The level of detail provided on the sub-regions is in line with the quality of available information and the level of detail provided. Sub-regional work is ongoing and it is hoped that this will provide inputs for a more detailed assessment in due course
Overall Impact	The appraisal indicates that the Plan will have a mainly negative impact overall and a detrimental effect on climate change, water resources, road congestion, traffic and waste	The appraisal indicates that there are a series of issues which are fundamental to the growth of the region. These issues apply to all regions in England to a greater or lesser degree. Both the plan and the appraisal recognise the importance of responding to these issues in an effective manner
SEA Requirements	The SEA requirement to produce an environmental report is not met	The appraisal report refers to those sections of the report which fulfil the requirement for an environmental report

TOPIC	KEY ISSUES	KEY CHANGES/RESPONSE
Appraisal Objectives	The appraisal objectives are not the most useful ones	It has been agreed that the IRF will form the basis for the Appraisal Framework
Monitoring Mechanisms	Mechanisms for monitoring should be put in place	The SA/SEA recognises the importance of monitoring of the Plan. It is the intention of the SA/SEA that a detailed assessment will be made of the Implementation Plan and that detailed proposals on monitoring will be presented in the final SA/SEA report
Birds and Habitat Directives	The requirements of the Birds and Habitat Directives have not been met	The issue of biodiversity and of national and international obligations are covered in the SA/SEA report. At sub-regional level guidance has been provided to all planning teams