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Our Ref:
Your Ref:

Dear Mike

RESPONSE TO CONSULTATION DRAFT SOUTH EAST PLAN

Please find attached our response on behalf of Government, to the Consultation Draft Plan, which we are presenting in two parts. First in Part A we set out our key comments on the overall strategy and approach taken. Second in Part B we provide a commentary on the various parts of the Plan. As we expect the Assembly may wish to reword various parts of the Plan following this consultation, our focus is the direction of policy thinking rather than the precise wording of individual draft policies, although we do offer a few wording suggestions in relation to some parts of the Plan.

Yours sincerely

Eike Ndiweni-Müller

PART A. KEY COMMENTS ON OVERALL STRATEGY AND APPROACH

1. We welcome the work the Assembly has undertaken and led to date. We appreciate that spatial planning and managing future change in the South East, is a challenging task. Indeed the beginning of the Plan sets out very well key global influences – including climate change and global competition – which will affect the future of the region and lead to changes that need to be managed if we are to work towards more sustainable forms of development.

2. We commend the Assembly on the

- (a) wide range of evidence compiled and analysed to date, including annual monitoring, demographic work, economic forecasting, a range of other research studies and the analysis summarised in section A; and
- (b) the extensive methods of consultation used to date, beginning with the setting up of a series of advisory groups and including opening conferences, Spring Debates, sub-regional working arrangements, commissioning surveys by Mori and the ongoing public consultation. We would be interested in any evaluation of the representative nature of these various methods that you might undertake.

Process

3. We note that the Draft Consultation Plan contains extracts of the results of earlier partial reviews of Regional Planning Guidance for the South East (RPG9). For example, you include policies (although no supporting text) on renewable energy and energy efficiency; these had been issued in final form November 2004. It is left somewhat unclear whether or not you are re-opening consultation on those policy areas that have only recently been subject to testing as part of a partial review. It would be helpful to clarify this.

4. In terms of the comprehensive review of RPG9, you have remained in dialogue with us to check that your plan-making process accords with the regulations and guidance. This also includes the Sustainability Appraisal. In our view you have made a good start on drafting the Plan and have initiated a suitable sustainability appraisal process, which incorporates strategic environmental assessment. We have separately written to you about certain aspects of the process and are happy to continue to advise you on such matters and your revised Project Plan.

Content

5. The Plan will be tested against the requirements set out in national guidance, including the requirement that the Plan should be “sound”. At this stage, we wish to highlight our core concerns about the soundness and clarity of the Plan’s content:

Vision for the Region -

6. We welcome the setting out of a Vision for the region. However, its substance seems to be dissipated across the variety of objectives, parameters, statements in various parts of the Plan, which can be contradictory. We would prefer to see a clear hierarchy of objective setting with a vision which acknowledges that economic growth is one of the key drivers for development. In addition, there is no clear spatial articulation of the vision; we note the absence of a key diagram or diagrams. We trust this will be rectified by the time the draft Plan is submitted to Government.

Options for the scale of regional growth –

7. You will recall that very early in the process we advised you on Government's expectations of the South East Plan. This was in response to a request from two of your advisory groups. I refer to Colin Byrne's letter dated 8th January 2004. We pointed you to relevant policy agendas and emerging sources of evidence, and concluded that:

"In order to provide sufficient analytical rigour in the testing of the possible alternative scenarios, we would expect the Assembly to develop scenarios starting from the reference in RPG9 policy H3 and paragraph 8.3, and incorporating higher growth scenarios derived from the sources quoted.... In developing higher growth scenarios we would ask the Assembly to pay particular attention to the need to address housing affordability, which regional partners agree is a key priority for the South East." [Letter to Mike Gwilliam from Colin Byrne, GOSE, 8th January].

8. Our Minister, Keith Hill, subsequently reminded you that Government "had already stated in RPG9 the need for higher levels of housing provision to meet the long term needs of the region." (letter of 25th November 2004). You will recall that he expressed his surprise and concern when the Assembly decided to reject the professional advice of its officers in considering which options to consult upon (letter from Keith Hill to Keith Mitchell, 7th December 2004).

9. We are concerned that the proposed options in the draft Plan fail to match up to the vision as expressed in the draft Plan and the long term needs of the region. For example, the draft Plan refers to an assumed level of economic growth equivalent to a GVA increase of 3% per annum. It also highlights the backlog in housing provision, continuing affordability issues in the region, a predicted labour shortfall and an ageing population. However, these and other factors do not appear to have been taken fully into account in arriving at the range of growth options. Indeed, the particular range of growth options on which you are consulting (i.e. 25,500-32,000 additional dwellings a year), is even lower than the range suggested by the evidence gathered and analysed by the Assembly to date (i.e. 32,000-36,000 additional dwellings a year).

10. As you know, there is work underway at national level following on from the Barker Review, and this will contribute further evidence in due course. At this stage I refer particularly to the national Household Projections and also the ODPM commissioned research into Affordability Targets and how these might be achieved. You will recall that Keith Hill encouraged the Assembly to develop its thinking in parallel on how to incorporate a regional affordability target, taking account of social and economic benefits as well as wider costs (letter from Keith Hill, 14th September 2004).

11. In conclusion, in our opinion the Assembly has failed to take proper account of available evidence and has failed to consider a sufficiently wide range of options. It is our strong advice that the Assembly should appraise another option for a higher level of housing provision.

Distribution of growth and sub-regional strategies –

12. In terms of the distribution of growth across the region, we note the spatial options, which this version of the Plan sets out. Certainly we support the stated intention to reduce economic and social disparities that exist between east and west of the region. The precise balance between east and west will inevitably emerge out of the process of drafting and testing the South East Plan. However, we are mindful that adequate provision needs to be made in the western part of the region to sustain the economic potential of that area, also in the context of future proposals for Heathrow. At the same time, development is required in the eastern and coastal areas for their economic regeneration.

13. We are familiar with the initial round of sub-regional work undertaken by the strategic planning authorities and we know you are commissioning further sub-regional work to inform the distribution of the growth down to district level and also broad locations. We appreciate the arrangements you have made with the strategic planning authorities to undertake this work. We think lessons will need to be drawn from this experience, especially given the variable quality of the sub-regional work to date. We did notice that some sub-regions were less willing than others to seriously consider alternative growth scenarios and we do question whether the requirements of the briefs you set in summer 2004, were met in all cases.

14. On the basis of the variable evidence of the first round of sub-regional work, we question the extent to which the sub-regional analysis has and will truly explore the future potential of all the sub-regional areas to accommodate development. We certainly hope that the Assembly will be able to draw together the individual elements in a meaningful way.

Sustainable communities and infrastructure –

15. We welcome the recognition within the Plan of the need for sustainable development within a context needing to adapt to climate change. References are made at the very outset to future development being undertaken more sensitively and with significantly less resource consumption impacts than in the past. This will require change at all levels. We agree that we must find ways to develop in more sustainable ways. In our view substantial growth offers an opportunity to make real changes in the way the region functions and consumes resources.

15. There is clearly anxiety among regional stakeholders about the potential impacts of development both on the environment and on the region's infrastructure. This has been evident, for example, at successive Regional Planning Committee and Assembly meetings and we recognise these are real concerns.

16. We are encouraged by work by the Assembly and others to date on exploring the issues in more detail. For example,

- the emerging Sustainability Appraisal process, which incorporates Strategic Environmental Assessment. Later stages of this process should help to identify relevant measures to mitigate any adverse impacts.
- Initial work on 'proofing' the Plan from a number of perspectives e.g. climate change, rural and future proofing.
- the modelling by the Environment Agency for the Assembly of potential impacts of different growth scenarios on water resource demand and advice on how shortfalls might be addressed.
- work commissioned by the South East County Councils on infrastructure requirements and the scope of alternative funding mechanisms.

17. However, we are concerned that the emerging policies should be sufficiently specific and clear to steer local development frameworks and other local and regional strategies in order to have any chance of success.

18. Furthermore, we have agreed we need to continue to work together to develop positive ideas in relation to planning for growth. This includes looking to see if we can develop better ways for resolving infrastructure problems, including timing and phasing issues. However, it is important to begin by recognising the region's existing advantages,

including its historic investment and extensive infrastructure. We would also wish to emphasise that the case for providing additional infrastructure will only be credible if it is based on clear evidence.

Integration of land use and transport –

19. The Draft Plan refers to “infrastructure” as a generic term, but at times particularly draws out transport infrastructure. We note that Roger Tymn and Partners, as commissioned by the South East County Councils, have advised that the single largest infrastructure cost of growth is likely to be transport. Government has set out its view in Planning Policy Statement 11 that “better integration between transport and spatial planning is critical to the development and delivery of an effective regional spatial strategy” (See Annex B of PPS11).

20. It is in that basis that we record our advice that further work may be required to ensure that the transport and land use strategy are integrated and underpinned by robust analysis. We would appreciate further information both on the analysis done to date and on the analysis yet to be undertaken as part of the sub-regional work on distributing growth. Certainly we would expect input from the Highways Agency and others in the consideration of options at district level and below. We would also expect to see more evidence that demand management and capacity maximisation have been considered fully.

21. We are concerned about the apparent inconsistency between different sets of objectives within the draft Plan. The emphasis of the Regional Transport Strategy is on “promoting management and investment in the system, fully utilising existing transport capacity before justifying investment in additional capacity”. However, this emphasis is missing from other parts of the Plan. In particular the cross cutting policy on infrastructure (CC4) seems to imply a policy of predicting and providing additional infrastructure rather than “intervention” provision, and omits any reference to making better use of existing infrastructure or managing demand.

Regional specificity -

22. We expect the South East Plan to be more regionally and sub-regionally specific than current Regional Planning Guidance for the South East (RPG9) and to be concise and avoid repeating national policy. Given the stage of its preparation it is perhaps unsurprising that much of the current policy content of the Draft Plan is still of a very general nature and at times appears even less specific than national policy.

23. We do expect the next version to comprise policies, which are more spatially specific. For example, we expect the Plan to set out the distribution of housing down to district level and to specify broad locations where substantial amounts of development might sensibly be concentrated in additional growth areas.

24. One area of regional specificity is draft policy CC9 on Green Belts. The Regional Planning Committee considered whether a selective review of Green Belt could be required but concluded that there is no need. However, the Panel for the Examination in Public into the Deposit Draft Oxfordshire Structure Plan, recommended that a full appraisal of all spatial options for Oxfordshire should be undertaken as part of the South East Plan process. The Assembly will need to consider the implications of this in relation to their decision not to carry out any selective review of Green Belt. In doing so, the Assembly will need to be mindful of the Government’s commitment to increasing the Green Belt area

overall; any changes to boundaries must be compensated by additional land being designated as Green Belt.

25. We accept that it varies according to subject matter as to what the South East Plan might sensibly add, either to existing national or to local policies. In some instances Government thinking about the particular contribution of regional policy, is still evolving. We refer particularly to

- accommodation for gypsies and travellers and
- regional casinos.

In both instances, Government has given initial indications about what might need to be included in regional spatial strategies. We would be happy to comment on your further thoughts as to how to address these two matters in the South East Plan.

Local and other matters -

26. We recognise the attempt to cover social concerns in this Draft Plan and welcome this intention. We would be happy to discuss further with you how you might develop this dimension such that it adds value and you avoid duplicating national and local policies. For example, we wonder whether out of the ongoing consultation there may be positive ideas about policy on good design.

Inter-regional dimension -

27. Clearly this Plan needs to be considered in the context of evolving regional spatial strategies in neighbouring regions. The East of England Plan, for example, is due to be examined in public later this year and appears to be based on a slightly different set of assumptions. Similarly aspects of the London Plan are being reviewed and examined in the near future. Given the strong inter-relationships between all three regions, it will be important to verify the extent to which the regional spatial strategies do or do not complement each other.

28. There are also relationships with other adjoining regions, which may require further attention. For example, in relation to the South West region, the Assembly will want to work with its counterpart in the South West on issues such as the potential role of Swindon in the wider sub-region, the significance of linkages with East Dorset and eastern Wiltshire/Gloucestershire, requirements for strategic water infrastructure to meet inter-regional needs in the Upper Thames area and the priority afforded to improvements to Reading station in relation to movements to and from the South West and Wales.

PART B. DETAILED COMMENTARY

Plan reference(s)	Comments
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<p>Objectives – A4-5, C2 & Section D</p>	<p>The variety of ways in which the Draft Plan expresses objectives and the vision for development in the South East, is confusing. For example, there are ‘Plan Parameters and Principles’ (Section A4) which comprises process aspirations, general aspirations and some spatially specific objectives. Then a series of points of principle are listed within the Vision (Section A5), a further list is included under the heading of ‘Statement of Policy’ (Section C2) and the description under ‘Core strategy’ in part also reads like a vision statement (Section C paragraphs 2.2.1-4). There are further topic-specific objectives listed under many of the topics in Section D.</p> <p>Consequently there is also a risk of inconsistency between different sets of objectives. For example, the Regional Transport Strategy is entitled “Manage and Invest”, and emphasises the need for “promoting management and investment in the system, fully utilising existing transport capacity before justifying investment in additional capacity”. However, this emphasis is missing from objectives or principles elsewhere in the plan which merely emphasis the need for additional infrastructure.</p> <p>While we appreciate there may be more than one level of objective-setting, it would be helpful to simplify and clarify the hierarchy of objectives for the Plan.</p>
<p>Section A</p>	<p>This helpfully sets out an overview of the context and some of the evidence gathered to date, although we note that little reference is made to the potential significance of changes in travel behaviour.</p> <p>We expect you will want to update the evidence underpinning the Plan before submitting the Plan to Government later this year. Key pieces of additional evidence that you were unable to consider in time or which have yet to emerge, include:</p> <ul style="list-style-type: none"> • The final version of the ONS sub-national population projections (2003-based). These give a higher rate of population growth than the earlier version had done (i.e. about 1,700 a year higher, 2007–2027). • ODPM 2003-based household projections (expected later this year). • Results of post-Barker Review work, particularly the two linked research projects on (a) Affordability targets and (b) Sustainability, commissioned by ODPM.
<p>A 3.1-3.9</p>	<p>We welcome sustainable development (SD), climate change and resource use being identified as part of the Challenges and cross cutting themes. Certainly climate change is as much relevant for housing and infrastructure development as for environment.</p>
<p>A 6.3.12</p>	<p>This refers to “current RPG9 target” as being below 28,300. Certainly RPG9 2001 set an average regional rate of 28,050 dwellings a year. However, owing to partial reviews, the RPG9 figure is now effectively above 29,000.</p>
<p>A 6.4.2</p>	<p>We specifically question the use of the term “economically active population already living in the region” given that forecasts relate to both resident and incoming workers. Please verify the accuracy of the figures and the time period quoted.</p>

Section B	
B 3.1-3	While we note the decision not to restate Government policy agendas, we think it could be helpful to refer to the Government's Public Service Agreement target 5. The target is "to achieve a better balance between housing availability and the demand for housing in all English regions while protecting valuable countryside around our towns, cities and greenbelt – and the sustainability of existing towns and cities". As you are aware Regional Planning Bodies are required to have regard to PSA targets in preparing their Regional Spatial Strategy.
B 3.2	We first wrote to you 8 th January 2004, requesting that as part of your Assembly's consideration of the distribution of housing, you explore the possible significance of an additional runway at Heathrow as well as the possibility of an additional runway at Gatwick post 2019. We note your challenges to Government on national aviation policy and we acknowledge your preference for an early review of the Plan once Government has made final decisions about major development at Heathrow or Gatwick. We would nevertheless prefer that you at least consider some sensitivity testing of alternative growth options against the scenarios set out in the Aviation White Paper.
B 3.3	We acknowledge your challenge to Government to develop a "more positive and coherent framework for the resolution of infrastructure problems at national, regional and local level". We are prepared to work with you and others to clarify the processes and mechanisms that enable the delivery of different types of infrastructure. In some circumstances there may be a need to improve the operation of those mechanisms.
B 4.1	It is not the case that the London Plan's housing provision has been increased to 30,000 dwellings per annum. Housing provision to 2006 is being monitored against a minimum target of 23,000 additional homes per year. The Plan seeks to achieve an output of 30,000 additional homes per year, but this is subject to identification of the housing capacity to achieve it, and will be subject to testing at an Examination in Public.
B 5	We welcome the application of the Integrated Regional Framework (IRF) in the appraisal of the spatial options for the South East Plan (see separate comments on the Sustainability Appraisal). Please be aware that the new UK Sustainable Development Strategy was launched in March 2005 and may have implications for the development of the IRF.
B 6.5-6	We expect you will update this list of Alterations made to RPG9 as part of the editing process of the Plan and clarify whether or not you intend to re-open the consultation and testing of the policies.

Section C	
C 2.2.1-4	<p>It is helpful to see an expression of the core strategy. We expect you may wish to refine the wording as a result of the consultation. At this stage we particularly question</p> <ul style="list-style-type: none"> (a) whether the assumed level of economic growth (ie equivalent to a 3% per annum GVA increase) is consistent with the assumptions underpinning the existing and/or emerging Regional Economic Strategy. No doubt SEEDA will be able to advise on this; and (b) how the wording might be improved to cover the need to make better use of infrastructure and encourage demand management.
C 3	<p>Options for Scales of Growth: In part A of our response, we have set out our concern about the level of the range of options included in the Draft Plan and we urge the Assembly to identify an additional option for a higher level of housing provision. At this point, we wish to give a couple of examples of the internal inconsistencies within the Plan and lack of rationale for the lower range of options which the Assembly has chosen as the basis for consultation. For example, the Plan acknowledges past slow house building rates as a key “reality on the ground” and reflects it in the form of an option. However, this does not match with</p> <ul style="list-style-type: none"> • the reference in Section A, paragraph 6.3.12: “The failure to build at the target rates has not removed this need and it is considered that this short fall should also be taken into account in future plans” • the overall conclusion on economic and employment forecasts, summarised in section A, paragraph 6.4.21; “...in overall terms, the level of labour supply required to support forecast economic growth would require significant continued net migration and a level of housing supply above that in Regional Guidance.” <p>It is unclear to us whether or not the options take account of the need to address the identified housing backlog. Certainly the Assembly had previously determined to tackle the backlog within the first ten years of the Plan period, but we cannot find confirmation that it has been factored into the range of options.</p> <p>In addition, we are concerned that the sub-regional breakdowns for the different options, include some very low figures for parts of the region which are not included in any particular sub-region. For example, the figure for the residual area of Kent under the three “Sharper Focus” options, is merely 200. We doubt this is sufficient, not least because even the Kent and Medway Deposit Structure Plan sets a considerably higher figure.</p>
C 3.2.3	<p>The figure of 25,500 figure has been selected on the basis that since 1998 developers have repeatedly failed to build out RPG9 rates. However the period 1999/2000 and 2003/4 saw particularly low completions figures. We remain unconvinced that this is a credible basis for deriving an option for consultation.</p>
C 3.3.4ii	<p>Recent monitoring data (Assembly Monitoring Report 2004) suggests that 71% rather than 66% of all new dwellings were built on previously-developed land between 2002-3 (68% 2001-2 and 61% 2000-2). It is also</p>

	on this basis that we question the 60% target in policy CC7.
C 3.5-4.11.8	There is no indication about the way in which demand management or smarter use of existing infrastructure has been or might be factored into the analysis of spatial options. It would be helpful to have some information about of this, not least because PPS11 advises “better integration between transport and spatial planning is critical to the development and delivery of an effective regional spatial strategy” (Annex B of PPS11).
Section D	We welcome the format and the scope of the topics covered in this section. However, we expect that there will be further editing and refinement of the policies to make sure that the draft policies are regionally specific and add value.
D1 – Cross Cutting Policies	It may be useful to have a number of cross-cutting policies. However, the draft text often reads like aspirational statements or principles rather than policies. It would be helpful if you could revisit these policies in the context of our comments about the need to clarify the hierarchy of objectives for this Plan and consider whether or not the steer they give to local planning authorities and others is sufficiently clear.
Policy CC1	We are unconvinced that this gives a sufficiently clear steer to the target audience. It also seems to duplicate the intention of policy CC3.
Policy CC2	While we welcome the prominence given to climate change in the form of a cross cutting policy, this appears to be an objective guiding the remainder of the Plan rather than a policy to steer other regional and local strategies (e.g. Local Development Frameworks). In the absence of an actual “Implementation Programme for Mitigation and Adaptation”, it is even more difficult to see how this particular policy could be implemented. (We assume that “Adaption” should read “Adaptation”). We trust you will give further thought as to how the South East Plan could better address the need to mitigate and adapt to the effects of climate change.
Policy CC3	<p>We acknowledge and indeed welcome the intention of this policy, but have questions about the detail. Firstly, we question the value of the first paragraph given it is expressed in very broad and conceptual terms. By contrast the second paragraph appears to be more specific and practical.</p> <p>Secondly, we think the second paragraph also needs to be revisited for a number of reasons. For example,</p> <ol style="list-style-type: none"> a) The intended mechanisms are unclear, although we assume that the planning system is intended. However, it will need to be understood which authorities the policy refers to, how they are expected to require these particular standards and whether indeed they are able to “require” such standards? b) The Eco-homes scheme may be superceded in future and therefore you will want to assess the risk of the policy becoming outdated. You will also want to consider whether the standard set is the right one or whether it is possible to pursue a higher standard. c) This policy overlaps with policy EN1 as both refer to BREEM standards. We would encourage you to avoid duplicating policy content in different

	parts of the Plan.
Policy CC4	<p>We agree that it is important to secure the timely provision of infrastructure. However, we question the practical effectiveness of a regional policy covering all types of infrastructure in this generic manner. Furthermore, this policy seems more likely to obstruct rather than enable timely provision of infrastructure. Presumably some of the wording (e.g. “The final policies to be included in the Plan will set out the mechanisms....”) will have been deleted in the next version of the Plan. Even so we have major concerns about the substance of the policy, which appears to us to be unduly restrictive:</p> <ol style="list-style-type: none"> a) It fails to even acknowledge that there may be scope for making better use of existing infrastructure or for managing demand. The assumption that only new infrastructure can create additional capacity, is fundamentally flawed. b) It is also flawed to infer that all new development will automatically lead to increased demand for all types of infrastructure. For example, demand for local education facilities depends on the population structure rather than household numbers. c) The policy, as drafted, seems to exclude the possibility of new infrastructure providing additional capacity. This may have been unintentional. d) It is unclear whether or not the Implementation Plan referred to in the policy is the same Implementation Plan circulated in draft form alongside the draft consultation South East Plan. <p>Finally, as we emphasised in our comments in Part A of this response, “the case for providing additional infrastructure will only be credible if it is based on clear evidence.”</p>
Policy CC5	<p>It may well be useful to have an overarching statement about the contribution of public land to development in the region. However, it requires more careful thought and may be better articulated through explanatory text or the Implementation Framework, rather than expressed as a generic policy.</p> <p>In its current form the policy merely refers to the collaborative working required between the Regional Assembly and public bodies. We would welcome clarification of your proposal for an overall “disposal implementation and management strategy” to be agreed between the Regional Assembly and public bodies. Who would you expect to be party to this? What might be considered a site “of regional significance” suitable for inclusion in such a strategy? What would be the status of this strategy? And how might it relate to other parts of the South East Plan or Local Development Frameworks?</p>
Policy CC6	<p>This appears to be a mere listing of neighbouring regions with whom the Assembly intends to have dialogue. It is unclear which outcomes this policy is intended to achieve.</p>
Policy CC7	<p>We welcome this as a positive, clear and succinct policy, which builds upon current policy in RPG9. Our only question is whether the “at least 60%”</p>

	<p>target is sufficiently challenging. It seems to merely repeat the national target set out in PPG3 and restated in RPG9 and elsewhere. However, recent monitoring suggests that an increasing proportion of development is on previously developed land and through conversions of existing buildings. It may also be possible to develop a more South East perspective, for example, clarifying which parts of the region are likely to be the main focus.</p>
Policy CC8	<p>This is a summary of different types of parts of the region, rather than actual policy. It would be preferable to include this description in explanatory text, as the policy content relating to these particular areas will emerge elsewhere in the Plan.</p>
Policy CC9	<p>The policy implies that no changes will need to be made to Green Belt boundaries in the region. However, the Panel for the Examination in Public into the Deposit Draft Oxfordshire Structure Plan, implied the need for appraising an option involving the selective release of Green Belt land around Oxford, as part of a full appraisal of all spatial options through the South East Plan process. It would, therefore, be advisable for the Assembly reconsider the need for selective review of Green Belt boundaries while recognising the Government's commitment to increasing the area in Green Belt overall; any changes to boundaries must be compensated by additional land being designated as Green Belt.</p> <p>We see no basis for the identification of "strategic gaps". If the intention is to promote areas of open space for recreational and other purposes, then it would be preferable to state this positively. However, if the intention is as stated in the policy (to prevent inappropriate development in certain areas), then it would be preferable to make a case for extending Green Belt boundaries where appropriate.</p>
D2 – Economy and Tourism	<p>These two topics could be presented in two separate chapters. We expect that in developing economy-related policies you will have regard to the existing and emerging Regional Economic Strategy with advice from SEEDA. We wonder whether more might be done to reflect the diversity of the South East economy, for example, by reference to the contribution of cultural or other sectors.</p>
Paragraphs 1.11-1.15	<p>We note the observation in paragraph 1.13 that the concept of smart growth is not entirely clear or proven, but understand that SEEDA are currently working on clarifying the concept.</p>
Policy RE1	<p>This policy appears to overlap with the substance of policy RE4. Would it be sensible to combine the two in some way?</p> <p>In the suggested list of criteria, some are easier to interpret than others. For example, it is unclear what is intended by "locations, which promote more sustainable communities". Would this perhaps cover issues such as home working?</p> <p>While we welcome a policy supporting agriculture and other sectors of the rural economy and rural economic diversification, it is insufficient to</p>

	mention “clearly defined criteria” without either identifying or referring to potential sources of those criteria.
Policy RE2	It is unclear how this policy is intended to operate. For example, is it the intention that local authorities should make provision in their local plans/local development frameworks to accommodate “regionally significant and locally important sectors and clusters”? If so, how would this fit with the substance of policy RE4 and is it helpful to identify sectors and clusters in this way over the medium to long term?
Policy RE3	We welcome the attempt to include policy relating to skills requirements in the region, including the need for sufficient and accessible premises for adult skills and learning also in rural areas. It could be helpful to consider the scope for multiple use of buildings or the integration with other community facilities.
Policy RE4	We refer to our comments above regarding the overlap with policies RE1 and RE2. While the explanatory text refers to the possibility of less space being required for employment land owing to productivity gains, the policy seems to infer a constant if not increasing provision of employment land. It is also unclear about the spatial implications of flexible working and/or home working. We understand that you are seeking advice from your Economic Advisory Group as to what steer might be given to local authorities as to where and how diverse business needs should be accommodated.
Policies TSR1-7	We appreciate you are leaving these policies unchanged since the Secretary of State issued them as Alterations to RPG9 in 2004. We understand that you are not intending to consult upon these. Clearly we would expect the supporting text and the accompanying maps to be part of the South East Plan as they help to explain and illuminate the policies.
Paragraphs 1.40-1.46 (Casinos)	The text explains the current state of play with regard to emerging national policy on Regional Casinos, but does not propose a regional policy at this stage. You will be aware that the draft East of England Plan takes a different approach and actually identifies potential locations. No doubt you will consider the need or otherwise for a distinctive regional policy on regional casinos in the light of the Gambling Bill and emerging Government advice. We will be happy to advise further.
D3 - Housing	In part A of our response, we have set out our concern about the level of the range of options included in the Draft Plan and we urge the Assembly to identify and appraise an additional option for a higher level of housing provision. The section begins with a helpful summary of the evidence the Assembly has gathered to date to inform policy. In some instances the text flags up emerging evidence, yet to be considered. For example, paragraph 1.6.5 refers to the work following up on the Barker Review recommendation for regional affordability targets, to which we have already alluded.
Policy H1	We note that this is to follow later.
Policy H2	We advise you to delete this policy. Rather than “housing allocation

	<p>strategies”, we would expect local authorities to identify housing sites in preparing a sites allocation Development Plan Document (DPD), which will form part of their Local Development Framework (LDF). Given that the preparation of LDF is a statutory duty, it is unnecessary to restate it in the form of a regional policy.</p>
Policy H3	<p>We have already questioned in relation to Policy CC7 whether the “at least 60%” target is sufficiently challenging, especially as monitoring seems to suggest that an increasing proportion of development is on previously developed land and through the conversion of existing buildings. We question whether this target is also sufficiently challenging in relation to housing figures.</p> <p>We note the intention to set separate targets for each decade covered by the Plan and the reference to housing needs in rural areas.</p> <p>The fourth paragraph of this policy leaves unclear whether or not “sustainable locations” are primarily defined in terms of accessibility by public transport, or whether other factors also apply. We would expect a wider definition of sustainability. For example, development which leads to less of higher quality agricultural land would cause us concern.</p>
Policy H4	<p>This policy refers to a regional target of 25% social rented and 10-15% other affordable housing, to be developed in more detail informed by the results of local housing needs assessments and implemented through local development documents. The appropriateness of these particular figures will no doubt be the subject of further debate. However, we support the intention and are pleased to see the clear reference to the need for local housing assessments to inform the setting of local targets.</p>
Policy H5	<p>We note the draft policy sets one region-wide target of 40 dwellings per hectare, as compared with the range set out in existing policy in RPG9 and PPG3. In suggesting a single figure is it your intention that this will assist monitoring of the policy?</p>
Policy H6	<p>This appears to duplicate the third paragraph of policy H4.</p>
D4 – Communications and Transport	<p>This section is little changed from that published by the First Secretary of State in July 2004 as Regional Transport Strategy (RTS). The exception is new reference to the potential for communications technology. We are concerned that so little has changed, because:</p> <ul style="list-style-type: none"> • Much has changed since the Examination in Public into the Regional Transport Strategy in November 2003. For example, we refer to the Traffic Management Act, the Aviation and Transport White Papers, the Government’s line on congestion charging, the consultation on ‘Making Better Decisions’, Local Transport Plan 2 and Accessibility Planning guidance. In addition the sub regional areas within the RTS are no longer compatible with those being explored as part of the South East Plan and there is further work ongoing in neighbouring regions such as London. • We had previously identified a list of issues requiring attention in the

	<p>next iteration of the RTS (summarised at Annex A). You had agreed that much more work is needed. However, this has not been reflected in the current draft version of the Plan.</p> <ul style="list-style-type: none"> As we have stated in Part A of our response, the emphasis of this section (i.e. on manage as well as invest), is incompatible with other chapters of the draft Plan which refer exclusively to infrastructure investment as the mean of responding to demand.
Policy T10a	<p>We think this new policy requires further thought. Firstly because it is our understanding that improvements in communications technology can lead to less predictable patterns of travel behaviour rather than reduce the need to travel. Secondly because it is unclear whether the 'communications technology' referred to, is merely that technology which is used to improve traffic information or also technology which enables audio-visual interactions between people in different places.</p>
Policy T11	<p>You will be aware that the London Plan 2004, Annex 4, paragraph 11 states that "further work is being undertaken with adjoining regions to bring parking standards in neighbouring areas outside London closer to those appropriate in outer London over time". How might it be reflected in the South East Plan?</p>
Policy T16	<p>We would expect reference to work with neighbouring regions, particularly London. For example, we understand that a study commissioned by the Greater London Authority, concluded that three or four strategic rail interchanges are required around the periphery of London, in part to address London's distribution needs. The same study also indicated the need for a strategic study involving London, the East of England and the South East, to identify and safeguard appropriate strategic rail interchange sites.</p>
D5 – Sustainable Natural Resource Management	<p>This section usefully draws together policy for different aspects of the natural environment. Others may have opinions on whether this or a slightly different grouping of policies is more helpful.</p> <p>We note the absence of policy or clarity as to how soil and high quality agricultural land in the region is to be protected and/or managed. It may be that these are seen merely as considerations in the sustainability appraisal of alternative spatial options. However, it may be useful to consider whether a regional steer is appropriate to guide other regional and local strategies.</p>
Policy NRM1	<p>This policy helpfully provides a summary of what local authorities need to consider. We question</p> <ol style="list-style-type: none"> why the policy refers only to Local Development Documents and no other regional and local strategies. whether it would be possible to provide more spatially specific guidance. whether it is reasonable to "require" development to incorporate sustainable drainage solutions irrespective of economic viability.

Policy NRM2	If it is possible to list broad locations for possible reservoirs that might be required in the region, as in paragraph 1.33, would it also be possible to specify in policy terms where land should be safeguarded for additional reservoirs? In its present form the policy provides an unclear steer to local authorities. We would also ask you to clarify whether or not demand from neighbouring regions has been factored into the analysis which underpins this policy?
Policy NRM3	The supporting text provides a helpful summary of national guidance and how different mechanisms are intended to work together. We commend the intention behind figure NRM1 and expect that the Environment Agency to advise on the accuracy of the detailed content. The draft policy itself seems to apply to many bodies and agencies. It would be helpful to provide a more spatial steer, for example, about existing flood defences – where and how are these meant to be protected from development? Are there parts of the region – certain growth areas - where Strategic Flood Risk Assessments are particularly required and how might they be used to influence the distribution or design of development?
Policies NRM4-8	These each provide helpful summaries of generic policy advice. We expect more spatially specific advice about each of these topics also in relation to existing and new development. For example, is it possible to highlight coastal areas where the preference is for managed retreat?
Policy NRM4	The supporting text refers to imaginative habitat creation but it is not clear what is meant, particularly in the context of uncertainty of the effects of climate change. What advice have you had about whether or not it is desirable to continue to manage habitats e.g. heathland, as in the past, or alternatively, whether it is possible to create new habitats in equilibrium with new climatic conditions? There may be aspects that should be explored further – for example, the use of Local Geodiversity Action Plans (LGAPs) in protecting biodiversity dependant on specific geology and the scope, if any, in coastal areas for managed retreat.
Policies W1-20	We appreciate that you have inserted the policies from the draft Waste Strategy only for information. You state in paragraph 1.80 that they do not form part of this consultation. Once the Secretary of State's Proposed Changes and eventually final form of the policies and supporting text and figures is available, you will be able to incorporate this into the South East Plan. Given some of the recommendations made by the Examination in Public Panel about the draft Waste Strategy, it may be that you will need to undertake further work to refine these policies and the supporting technical material, in parallel with the Secretary of State's process for finalising the Alterations to RPG9. We will need to discuss with you in detail how best to handle this.
Policies EN1-6	We appreciate you are leaving these policies unchanged since the Secretary of State issued them as Alterations to RPG9 in 2004. We understand that you are not intending to consult upon these. Clearly we would expect the supporting text and the accompanying maps to be part of the South East Plan as they help to explain and illuminate the policies.

Policies M1-8	We appreciate you are leaving these policies unchanged since publishing a draft version in 2003/4 and that you are awaiting the Secretary of State's Proposed Changes in due course. The resulting policies and supporting test can then be incorporated into the South East Plan.
D6 – Countryside Management	<p>We appreciate that policy relating to areas designated as being of national and international importance for nature conservation is located under section D5. Some people might automatically search for it under this section D6.</p> <p>We note that you include a paragraph about the Proposed South Downs National Park. Given that this might be designated within the next couple of years, you may want to consider formulating a policy about existing and future national parks or an additional separate policy for the South Downs area.</p>
D7 – Management of the Built and Historic Environment	<p>We welcome the references to Neighbourhood Management approaches and the importance of design. This section may provide a good opportunity to identify key considerations of good design and relevant regional or local sources of good practice, ranging from issues of density to the responsibility for designing out crime. Government is committed to creating safer and stronger communities. For example, you will appreciate that authorities have a statutory duty to incorporate crime prevention as part of all of their functions, including planning functions.</p> <p>We note that some policies are framed merely in relation to local authorities and no other bodies.</p>
Policies BE1-2	Both policies refer to programmes and plans for managing change either at urban or neighbourhood level. While the first refers to principles, the second seems to identify possible planning tools. It could be possible to combine these two policies and refer to Local Development Documents (LDDs) rather than Area Action Plans or another, to provide flexibility for Local Planning Authorities to chose a suitable approach.
Policy BE3	We welcome the reference to the importance of positive management of the rural urban fringe. It could be helpful to refer also to other mechanisms than LDDs, such as agri-environment schemes. The text would benefit from editing (for example, what might “potentially subject to dereliction due to under-use” mean?) We also question whether the policy gives sufficient steer to individual local authorities in the region.
Policy BE5	This policy overlaps with policy H4 in relation to affordable housing in rural areas. It is very unspecific as to the source or sources of “rigorous design and sustainability criteria”.
Policy BE6	We note the absence of any reference to architectural heritage and question whether the policy could provide more spatial detail.
D8 – Town Centres	The draft text provides a starting point, but we would like to see it go further in making strategic choices and steering growth. You will be aware that Government has now issued PPS6. We are concerned that there is some

	<p>conflict with existing national policy as set out in PPS6 in relation to out-of-centre development and that the policies fail to give adequate steer to local authorities about where growth should be directed.</p>
Policy TC1	<p>It is encouraging to see that draft PPS6 fed through to this draft plan in terms of the intention to distribute growth to middle and lower order centres, avoiding over-concentration of growth in the highest order centres, to achieve an even distribution of facilities and meet needs locally. However, we advise against repeating national policy; it would be preferable to point out that policies in PPS6 apply, especially now that the final version has been issued.</p>
Policy TC2	<p>We have a number of general concerns about the ‘Provisional list of town centres’:</p> <ul style="list-style-type: none"> a) There is currently no differentiation between different town centres. We would expect more of a hierarchy rather than a mere list. For example, regional hubs might be expected to play a more prominent role. PPS6 advises that RSS should make clear strategic choices about where growth should or should not be encouraged. b) There is no guidance as to the scale of development that might be expected or even on what basis local authorities might determine this at a later stage. While we would not expect details for every centre, we would expect some steer as to where major activity and development is likely to take place. c) Paragraph 1.14 about the sequential approach section advises that development should be appropriate to the centre’s role in the network; however policy TC2 provides no relevant information about the respective roles of individual town centres. d) the policy states that changes to the strategic network of town centres can be made through revisions to RSS. However, we would be surprised if they were not made through revisions to RSS. <p>We have a particular concern about the inclusion of Bluewater in the list as we are unconvinced that Bluewater performs the function of a town centre. In our view, it is an out-of-town retail development. As such, it should not be the focus for major additional developments or uses, which attract large numbers of people, especially as that paragraph 1.16 of the draft consultation Plan states that no need has been identified for large-scale extensions to existing out-of-centre or sub-regional shopping centres up to 2026.</p> <p>We are also concerned that paragraph 1.16 states that intensification of development at out-of-centre sites may be appropriate if there are no sequentially suitable sites. Our advice is that this could be a slight misrepresentation of national policy and that it would be preferable to simply refer to PPS6.</p> <p>An additional query about the reference in paragraph 1.32; why are you encouraging underground parking only in major centres?</p>
Policy TC4	<p>We are concerned by the suggestion that “where there are no sequentially suitable sites, upgrading an existing out-of-centre sites should be</p>

	<p>considered". This appears to conflict with national policy insofar as it fails to reflect the full sequential approach, which includes requiring retailers and others to be flexible in looking at more central locations.</p>
Policy TC5	<p>Paragraph 1.42 mentions that retail warehousing will need to satisfy the tests in PPG6, and then proceeds to name just some of those tests. If the plan is to repeat any aspect of national policy (which it should avoid doing), then it should do so fully and refer also to the requirement to demonstrate 'need' and accessibility by non-car modes.</p> <p>We expect that the policy will provide more spatial steer once the work you refer to, has been completed.</p>
D9 – Social, Cultural and Health Dimensions	<p>It is a matter of judgement whether these dimensions should form a separate section or be interwoven throughout the document; no doubt there are valid arguments on both sides. We welcome this attempt to provide a framework for social, cultural and health dimensions, which is consistent with Government's commitment to Social Inclusion. We wonder whether it would be helpful to make more explicit reference to 'community cohesion' and also to the need to engage local communities in decision-making.</p> <p>The content and indeed the language itself, is of a very general nature. It is worth considering whether or not more specific and spatial content is feasible.</p> <p>We welcome your intention to use the outcome of your research into the issue of the ageing population and service provision.</p>
Policy S1	<p>We would suggest using the terminology "Regional Inequalities" rather than "disparities" as mirroring the language of the Health White Paper.</p> <p>The wording is rather vague. For example, what is meant by "agencies will need to sharpen the focus of their programmes" in the policy itself?</p>
Policy S2	<p>What is meant by a 'relatively high level of health' in paragraph 1.7? You might wish to consider making comparison between the region and other European regions or countries. Given that this policy concerns matters covered elsewhere in the Plan (i.e. transport and open space), we wonder whether this should be framed as a separate policy or whether it is better expressed as explanatory text.</p>
Policies S3-7	<p>We note the helpful references to rural aspects, accessibility, provision of services and community infrastructure. We wonder whether there is more scope for combining policies, particularly if the intention is to promote mixed uses or combinations of services. What advice have you had about the scope for combining health, social and cultural provision?</p>
Section E	<p>As we point out in Part A of our response, we appreciate the arrangements you have made with the strategic planning authorities to undertake sub-regional work, but we have concerns about the variable quality of that work. For example, the work on South Hampshire clearly considered a range of options in a positive and clear manner and identified a preferred option. By</p>

	<p>contrast, we have previously criticised earlier work on Gatwick for falling short of the requirements of the brief set out by the Regional Assembly. There is a risk of serious mismatches in a number of sub-regions between forecast needs and the options being considered for accommodating those needs.</p> <p>At the same time, we trust that you will incorporate the final Alterations to RPG9 in respect of both Ashford and Milton Keynes & Aylesbury, both of which were finally issued by the Secretary of State in 2004 and 2005 respectively.</p> <p>We are concerned that the options recorded against each sub-region in this section, do not entirely match up with the options set out in table C2 (Section C) or indeed with any higher option that you might consider in the light of our comments on this version of the Plan (see our comments in Part A of this Response). We would welcome clarification as to how the Assembly intends to ensure that the next round of sub-regional work will result in a coherent distribution of development across the region matching the aspirations of the Plan.</p> <p>We expect sustainability appraisal to be integral to the sub-regional work (refer to our comments in respect of the Sustainability Appraisal).</p> <p>We appreciate there is still further work to be done both on developing policy on the distribution of growth and on refining the detailed policies. We hope that the Assembly will be able to draw it together in a meaningful way. At this stage, we note that the maps merely locate the sub-region. There is no consistent presentation of the draft strategy and at this stage there are inconsistencies in policy formulation and content. For example, we note that while general policy (H4) sets a regional target and suggests local targets be informed also by local housing assessments, the section on South Hampshire provides a specific figure for affordable housing in the South Hampshire area. There is also a variety of policy approach in relation to infrastructure provision.</p>
Section G	<p>Paragraph 2.1 admits that there are some gaps in the targets and indicators and one of the issues arising from this appear to be some inconsistencies between the Draft Plan indicators and the RSS core indicators recommended by ODPM. We do not intend to cover each indicator in detail in this response. However, as you are aware the concept of core RSS and LDF indicators is based on both the need for inter and intra regional consistency and, therefore, where there is a gap it is important to clarify arrangements for bringing these in line with RSS core indicators, which themselves are likely to evolve. We accept that the first Annual Monitoring Report of the South East Plan may take some interim measures.</p> <p>One of the more significant gaps appears to be the absence of any indicators to monitor development relating to regional services as suggested in Table G 1. Recently published PPS6 (paragraph 4.2) states that RSS Annual Monitoring Reports must cover the national core indicators for regional services and, therefore, following core indicators</p>

	<p>need to be included unless any deviation from the PPS6 advice can be fully justified :</p> <p style="text-align: center;">REGIONAL SERVICES</p> <ul style="list-style-type: none"> a) Amount of completed retail, offices and leisure development respectively: by local authority area. b) Percentage of completed retail, office, and leisure development respectively in town centres <p>Table G1 does not include any core indicators for Minerals and Waste, nor does it make any cross-reference to the indicators in the emerging Waste and Minerals Plan for the region. It is recommended that the relevant RSS core indicators are included.</p> <p>The absence of any contextual indicators to monitor demographic changes and the changes in the housing market conditions is also striking especially due to the significant impact these evidence have in helping to understand appropriateness and effectiveness of key RSS policies.</p> <p>A key objective of RSS core output indicators (PPS11 paragraph 3.10) is to ensure both consistency between regional and local monitoring, and cost-effective data gathering. The additional output indicators proposed in table G1 appear to be able to gather data from already established surveys etc and may be cost-effective. However, it is advisable to be mindful of these requirements in finalising the indicators. We will be separately commenting to you on the 2004 version Annual Monitoring Report.</p> <p>Monitoring Targets As stated in PPS11 (paragraph 1.7) the main purpose of the RSS monitoring is to provide “a clear link between policy objectives and priorities, targets and indicators. It should be monitored annually against the delivery of its priorities and the realisation of its vision for the region, and reviewed as appropriate”. At present, the proposed targets are confined to individual topic sections. It would be helpful for the monitoring section to draw these together to provide a clear link between targets and indicators. We suggest you include in Table G1 appropriate targets against which to monitor the implementation of the RSS.</p> <p>Monitoring Arrangements We would welcome more information about the arrangements you propose to put in place for monitoring, in view of the need for consistency between regional and local monitoring activity and also the requirement in PPS11 (paragraph 3.10) that the “RPB should provide the Secretary of State with details of the proposed monitoring arrangements where they are not set out in the draft revision to the RSS. The Secretary of State will need to be satisfied that the RPB has established a monitoring and review mechanism, with member local authorities and other bodies as appropriate that can respond sufficiently quickly to any adverse impact of the strategy”.</p>
Implementation Framework	We will be happy to discuss this with you further.
Sustainability	We have and will continue to participate in the Sustainability Board, which

Appraisal (SA)	<p>you have set up.</p> <p>In our view, you have made a good start to the appraisal process and we have separately sent you further advice on particular aspects of that process.</p> <p>In the light of our comments on the options presented and the need for the Assembly to consider also a higher level of housing provision, we would welcome clarification as to whether or not a higher level of growth was subject to Sustainability Appraisal as part of initial technical work.</p> <p>In relation to the next steps of the plan making process, we are concerned that the sub-regional work also incorporates sustainability appraisal. Our ODPM colleagues have already advised you that sub-regional working is an intrinsic part of preparing a RSS revision, and sub-regional policies that have significant social, environmental and economic effects should be subject to SA. Therefore, even where an RPB discards some of the options put forward in the sub-regional work feeding into the RSS revision, these options should still be subject to SA. This work should inform the SA for the South East Plan as a whole so that on completion there is only one SA Report for the South East Plan.</p> <p>You do not need to prepare separate SA Reports for each work stream, although you may find it useful to prepare sub-regional and thematic technical papers to support the overall SA Report. (See paragraphs 2.1.5 to 2.1.7 of the ODPM draft guidance on 'SA of Regional Spatial Strategies and Local Development Frameworks').</p> <p>Exactly how the necessary SA work in connection with the above is undertaken is matter for you to discuss with the County/Unitary Councils who you have commissioned to lead this work. However, in accordance with ODPM guidance there should be consultation on preferred options or option if there is only one and this should be informed by an SA of this option and the reasonable alternatives to it. You will want to consider whether any related consultation is carried out by yourselves or the County/unitary councils.</p>
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Specific Comments which have previously been communicated to the Regional Assembly but which have not been addressed to date:

Structure of the RTS (Section D4 pages 83 –112)

- Currently problem identification is limited to textual comment about economic success, pockets of deprivation, unreliable journey times and the gateway role. Maps or text defining the most congested or inaccessible parts of the road and rail network are required. Problems should more clearly stated and be better aligned with government policy, the shared LGA/government priorities and the RSS, particularly in regard to the infrastructure/management and the transport congestion/housing growth issue.
- In the context of unresolved problems the RTS should identify where further appraisal and study work is required as a priority, and in the light of anticipated resources: as linked to the RSS.
- The sub-regional areas are studied independently in the spatial strategy. The RTS should replicate these areas and have distinct policies and interventions set out for each sub regional area, including demand management.
- Investment Frameworks. These need to be completely rethought in the light of the RSS geographic area, SEERA prioritisation methodology work and the consultation on regional indicative allocations and joint transport/housing/employment. For a start they should be titled Intervention Priorities and encompass non scheme transport interventions.

Contents

- LTP2 guidance has now been published and requires LAs to produce a long term Transport Strategy which links with housing and employment. This RTS should provide a better steer to LAs as to the key characteristics of such a strategy in their area.
- Hubs, Gateways and spokes. It was acknowledged at the Public Examination that greater clarity was required as to the priorities, characteristics, land use and transport implications of a hub, interchange and gateway. The list of hubs etc should now be reconciled with the Functional Urban Regions Cores, as set out in Map C7 page 38, and consideration given to Redhill/Reigate, which, other than Ebbsfleet, is the only non FURC which is not a transport hub. Consideration should be given to deletions, additions, corrections to the hubs and the spokes in map T1 p 103. RTS consultation suggestions included as additional spokes; A40 west Oxfordshire, Maidstone to Tonbridge link. Dover to Ramsgate, and Aylesbury to Oxford.
- Cycling and Walking. In the light of the health agenda (childhood and general obesity, heart disease) and of the environmental impact of short trips by car, more weight should be put on the promotion and prioritisation of measures to increase cycling and walking.

- Demand Management and RUC. Need to take full account of the Transport White Paper agenda for national Road User Charging. How would this affect the region and which are the priority areas for potential Transport Innovation Fund bids.
- Railways. Needs updating in the light of the restructuring of the Railways Industry, Regional Planning Assessment and RUS outputs. Particular reference should be made of the proposal to extend Mayors control of railways into SE. Also can the locations of multi-modal interchanges now be identified. Some view should also be made on the Crossrail project proposal to terminate in Wokingham and short of Ebbsfleet.
- Accessibility. LTP2 and Accessibility Planning Guidance follow from the Social Exclusion Unit's report – making the links. The RTS should be proofed against the policies and measure proposed in these new guidance documents.
- Short Sea Shipping. Update the maps to reflect agreed routes.
- Parking. Review parking standards and wording of policy. Requires more guidance to ensure consistency and appropriate standards between major commercial centres. Guidance could go further to identify the potential for more innovative approaches to park and ride.
- Monitoring, Indicators and Targets. What is to be monitored and the scope of the monitoring will need to be revised in the light of the TWP, LTP2 guidance, IRF, and sustainability Appraisal of the RSS. Consider additional indicator – average trip length by trip purpose, along with a target to reduce trip lengths.
- Environmental Issues. The area around emissions and targets needs more development and coherence with the RSS.
- Ports. Wharf safeguarding like the work undertaken by the Mayor of London should be considered for inclusion and, separately, policy revised in light of the new ports policy in summer 2005.
- Aviation. SEERAs resistance to taking any view other than an in-principle objection to a third runway at Heathrow is limiting and some view on the impacts of the AWP alternative to HRW, ie expansion at Gatwick, should be made. There are also AWP issues relating the Regional Airports and maintenance and national training facilities which should be considered.