

Comments from: CPRE South-East  
Core Regional Policies – Chapter 4 Spatial Strategy

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<b>Introduction and Overview</b>				
The process so far (Chap 1(4))		Text sets out the process of RSS preparation. This records three main stages in the review process for the South East, commencing in 2003.	<p>This is the first opportunity to make comments following the EIP. The Panel Report was not binding in itself, but it was generally welcomed and expected to be followed. All parties spent much time and energy in process, and many will be disappointed by the proposed changes which seem to include many pointless or unexplained alterations and deletions. It is vital that any changes are clearly justified by evidence.</p> <p>This was a professional process leading to an unprofessional outcome. In some cases, too much detail and a lack of flexibility, especially in the sub regions, is a cause of confusion and concern.</p> <p>The third bullet point refers to the current stage in the process. It does not seem appropriate to include it, as currently set out, in the final version of the Plan. It should be reworded to give a summary of the process of developing the final Plan.</p>	<p>Object:</p> <p>In order to remain strategic, the final version should be amended and address the document's lack of clarity or over-prescription, as with the sub regions.</p>

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<b>Vision and Objectives</b>				
Vision (Chap 3(1))	Vision	The vision has been updated to reflect that in the Regional Sustainability Framework.	The RSF is a carefully-considered and widely consulted document, with a well-supported vision.	Support

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<b>Spatial Strategy</b>				
Spatial planning principles (Chap 4(2))	N/A	6 Spatial planning principles are proposed, based on the Panel's 'strategy building blocks', each of which is articulated through a 'SP' policy.	Comments on the principles of the spatial planning principles are picked up in relation to the relevant 'SP' policy comments below.	Accept

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SP1 Sub-regions in the South East (Chap 4(3))	N/A	New policy SP1 addresses sub regions. Isle of Wight is no longer identified as a sub region or special policy area. All other sub-regions, and their extent, have been accepted in the Proposed Changes.	No objection to the inclusion of a policy about sub-regions, and the SoS's support for the sub-regions is helpful. Exclusion of the Isle of Wight must not lead to its special character and needs being ignored.	Accept
		The policy also sets out the focus of each sub region (whether growth and/or regeneration).	<p>The identified 'policy focus' for a number of sub regions does not align with the objectives for each sub region, identified by the Panel, or reflected in the relevant sub-regional policies, or regional policies (e.g. SP2, SP4 and RE6). It is not clear why the WCBV, Central Oxfordshire and Gatwick have been identified as areas for growth <i>and</i> regeneration. These are areas where the proposed policy approaches focus on the management of growth, although there are pockets of deprivation which should not be ignored (as in the London Fringe areas of Surrey).</p> <p>It may be more appropriate to reflect the policy focus of the sub regions in the introductory section of each sub regional chapter, but should the SoS chose to retain this table, we suggest that it be amended to identify the Western Corridor and Blackwater Valley, Central Oxfordshire and Gatwick as having such a focus.</p> <p>'Late additions' which have been through minimal testing, such as Bordon/Whitehill and Shoreham Harbour should not be given the same priority as places where development is more tested and accepted. There is a marked inconsistency in the addition of Shoreham Harbour and the deletion of South West Reading, both having flood risk issues.</p>	Object

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SP2 Regional Hubs (Chap 4(6))	CC8b	Reference has been added to the need to focus new housing development and economic activity in locations close to or accessible to hubs.	<p>Hubs started out with a transport focus, and now are being used as growth poles. This is not a logical evolution, as not all transport hubs can take growth in housing and employment. There have been opportunity additions proposed by the SoS arising from the New Growth Point initiatives.</p> <p>We support the principle of locating new housing development in areas accessible by public transport. We object however to the insertion of a new bullet point (iv) focusing new housing development in locations close designated hubs, however. It is clear from the reasons for designation of the hubs, reflected in the proposed table (ref: Chap 4(7)) that they are identified on the basis of a wide range of criteria, i.e. not solely access by public transport. Therefore, their characteristics, future needs and priorities vary. Some hubs have an ability to accommodate new housing but, the role of hubs as a focus for housing development vary depending upon their capacity potential and connectivity.</p> <p>The proposed new bullet point does not recognise the individual distinctiveness of the regional hubs and their ability to accommodate new housing in a sustainable way, and may lead to pressure for unsustainable levels of development in and around some hubs (pressures likely to be exacerbated by housing provision 'minima'). It should be amended accordingly.</p>	<p>Object</p> <p>Key action on hubs is to remove the blanket assumption about growth, and instead concentrate on each fulfilling an appropriate role. This should be well supported by and act as a focus for investment.</p>
		Reference now also made in policy to delivering long term development as identified SDAs.	It is not entirely clear why reference is made within the policy on regional hubs to Strategic Development Areas. The Proposed Changes acknowledge that a number of the SDAs 'serve' regional hubs, but this is not the case with all the SDAs being proposed. Should the SoS's suggestions on SDAs be accepted instead of a bullet point in the 'Regional Hubs' policy, a dedicated policy should be included in the Spatial Strategy Chapter setting out the rationale for the identification of SDAs, their role and function and priorities for their delivery.	<p>Object</p> <p>SDAs have been added and deleted, and are also not of uniform status. Their role needs to be clarified.</p>

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SP2 supporting text (Chap 4(7))	Section D1; paras 1.21-1.22	An additional hub is identified at Dover.	As an interchange and Gateway, we accept the designation of Dover and as a hub as this may assist in provision of sustainable transport and other services. It should not be a focus for further housing growth on this basis.	Accept

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SP2 (Chap 4(8))		<p>New text has been added about SDAs. It includes new proposals for SDAs at South of Oxford; East of the M1, Milton Keynes; Shoreham, West Sussex; and Whitehill/Bordon, Hampshire. The Panel's recommendations for SDAs to the South East and South West of Milton Keynes accepted, as are proposals in the Plan for SDAs at Fareham and North of Hedge End in South Hampshire.</p> <p>The Panel's recommendation for a SDA at South West Reading was not accepted, due to uncertainty that the SDA would be deliverable.</p>	<p>Remove SDAs South of Oxford and East of the M1, Milton Keynes; and Shoreham, West Sussex.</p> <p>The SDA North of Fareham should be regarded as a 'reserve' SDA, as was suggested at the EIP, and is now supported by the SA.</p> <p>SDA at South West Reading to be subject of further testing against Policies NRM4 and NRM5, and especially in relation to flood risk management.</p>	Object

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<p>SP2 supporting text (Chap 4(12-14))</p>	<p>N/A</p>		<p>The Proposed Changes should be clearer about the rationale for identifying SDAs, their role and purpose. SDAs should be identified on a consistent basis, as those areas proposed for growth specifically <i>in support of</i> and <i>integral to</i> the spatial strategy – that is, where they provide for an identified need in the broad area in which they are being proposed.</p> <p>A reasonable ‘test’ for this definition would be: if the SDA does not come forward, is the need such that the proposed development should be located elsewhere within the sub region or surrounding area? Thus a distinction can be made between ‘true’ SDAs that serve to deliver the spatial strategy (such as those in South Hampshire and SW and SE of Milton Keynes), and others – which should not be identified as SDAs – which may provide additional opportunities for growth (such as Shoreham, Bordon/Whitehill) but are not integral to the spatial strategy, nor do they provide for a specifically identified need (such that should they not come forward there is no expectation that alternative development of a similar scale should be expected).</p> <p>Reservations about identifying Bordon/Whitehill (BW) as an SDA, as this may undermine the aspirations for regeneration as an eco-town (which are the basis of CPRE’s conditional support for significant additional housing numbers at BW). An eco-town should bring high targets for modal shift away from the car, energy efficiency etc as well as new local jobs and town centre facilities to reduce the need to travel. A “standard” SDA at BW without eco-town standards would be quite unacceptable in terms of impact of increased population on the East Hampshire AONB, the designated SDNP (yet to be confirmed) and wider countryside, especially in terms of increased commuting and car use.</p> <p>Nor is identification as an SDA justified, as BW is not integral to the strategy. Development at BW is designed to provide new employment and enhanced town centre facilities at Bordon when the Army withdraws which can only be achieved by development at BW, and not elsewhere in East Hampshire.</p>	<p>Object; see comment</p> <p>Reference to BW as an SDA should be as provisional SDA, subject to satisfactory sustainability appraisal.</p>
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			<p>The proposed inclusion of additional SDAs at South Oxford, East of the M1 and Shoreham is not supported. The principle and scale of development being proposed in these places has not been fully tested and there are questions about deliverability. These SDAs should be deleted from the final Plan and can be fully tested - along with alternative options - through the next RSS review. There is greater uncertainty about the deliverability of Shoreham Harbour and the Plan will be inconsistent on this point. Removal of the Reading SDA was a last minute decision, with housing allocations passed to other areas, such as Surrey.</p>	<p>Object and comment</p>
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SP3 Urban Focus and Urban Renaissance (Chap 4(9))	CC8a	<p>Policy seeks to achieve at least 60% of all new development on previously developed land and through conversions of existing buildings.</p> <p>New text has been added listing 'Centres for Significant Change'.</p>	<p>This is another example of where applying a national target regionally is inappropriate, and in this case un-ambitious. There is a continuing need to safeguard Greenfield sites in the South East.</p> <p>At least 75% of all new development should be on previously developed land. If the first bullet point (i) is to be amended making reference to concentrating development'... adjacent to...'urban areas, greater clarity is needed to reflect the SoS's reasoning for this amendment - i.e. through the addition of text at the end of the clause'...where SDAs are proposed'. The separation of settlements, and retention of key settlement patterns, has not been fully emphasised.</p>	<p>Object: Raise the target to 75%, which must include housing.</p>

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SP5 Green Belts (Chap 4(14))	CC10a	<p>Policy reworded to protect the broad extent of GB. Policy also sets out need for selective GB reviews:</p> <ul style="list-style-type: none"> <li>- to the NE of Guildford and possibly to the S of Woking;</li> <li>- to the S of Oxford;</li> <li>- in the area of the former DERA site at Chertsey;</li> </ul> <p>as well as;</p> <ul style="list-style-type: none"> <li>- possible small scale reviews including around Redhill-Reigate.</li> </ul>	<p>The Proposed Changes maintain the integrity of the Green Belt and strengthen policy; however it opens the way for selective Green Belt reviews around Guildford and Woking.</p> <p>Welcome the endorsement that the broad extent of the Green Belt remains appropriate. We do not accept the need for small scale local reviews of green belt in the South East. We do not support the suggestion that review in the Oxford Green Belt to the South of the City is needed. The preferred spatial option has been based on growth at Bicester, Didcot, Wantage and Grove and within the built-up area of Oxford, and there is no case for a review of Oxford's Green Belt.</p> <p>We are concerned that there is serious obfuscation and misrepresentation in the changes proposed on the Green Belt. On the one hand in this Plan, and repeatedly in national statements, the government declares that protection of the Green Belt is essential and a key part of national policy. However, at the same time, significant reviews are proposed – such as those in Surrey and Oxfordshire, which could fundamentally change the disposition of the Green Belt in these areas. The Metropolitan Green Belt exists to enhance London; other green belts exist to protect other major cities, of which Oxford is one. We are not against minor reviews that fit with a well designed and gradual evolution of cities and their environs. We vigorously object to major reviews that undermine the character of the cities the green belt aims to protect.</p> <p>The supporting text on Green Belt contains the often made confusion between Green Belts and Strategic Gaps. We suspect this is why the Policy on Strategic Gaps has been dropped. We object to this.</p>	<p>Object to selective review of green belts.</p> <p>CPRE strongly objects to a policy of providing GB land outside the region to compensate for losses in the South East. If Green Belt land is to be released, substitution must take place within the <u>same</u> area.</p> <p>SP5 must be reworded and strengthened.</p>

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			<p>Green Belts do not, and should not apply everywhere. Particular cities, metropolitan or not, need green belts. Green Belt boundaries should only be changed in 'exceptional circumstances'. The reviews to the Green Belt being proposed in Surrey and Oxfordshire are a response to a partial, unproven case that the development proposed could not be achieved at a manageable level in the existing urban areas.</p> <p>Strategic Gaps fulfil an entirely different function which is particularly important in the South East, where there are strong development pressures and a mixed pattern of smaller settlements (up to 50,000) across the region. Retaining the character and identity of these settlements is much harder if the settlement edges merge into one another and the sense of identity is eroded. Strategic Gaps help to manage this risk. We do not agree with the GOSE advice to the Panel that Strategic Gaps all needed to be defined in the RSS (see Panel Report). The RSS should explicitly support the defining of Gaps in the sub regions and the Rest of County Areas as they are needed.</p> <p>The pattern of settlement in the South East means that there are a great many medium-sized towns close to each other that thrive economically and have much development potential. It is these closely adjacent settlements without Green Belts that need the strategic planning support of Strategic Gap policies.</p>	<p>Object strongly. Strategic Gaps should be retained.</p> <p>In Sussex, the proposed eco-town at Ford would remove the last area of open land on the coast.</p>
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Key diagram (Chap 4(17))	Key Diagram	The key diagram has been amended to identify all round 1 new growth points, Dover as a hub, the proposed SDAs, Diamonds for Economic Growth, proposed Centres for Significant Change, primary and secondary town centres, river Thames, CTRL, and the New Forest National Park.	The key diagram is important and is virtually illegible as presented on page 20 of the Companion Document.	Re-present in larger format, as in rear cover.

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Supporting text on rural areas (Chap 4(21))	Section B; paras 5.2-5.6	Revised text is included on 'Supporting and protecting our rural areas'.	<p>The title of the section should be changed to 'Supporting and Protecting our Rural Communities'</p> <p>The statement that 'Extensive parts of the region are largely undeveloped' is symptomatic of the planning mindset in the South East. It demonstrates an approach that views urban as superior to rural. This mistake was not made in the draft RSS and must be corrected. Rural areas are vital to the character of the South East, and its quality of life. As well as their vigorous contribution to growth in their own right, they also contribute to the character of settlements – giving them their 'setting'. They are increasingly sustainable and socially diverse and look for 'smart' ways of growth.</p> <p>The Rest of County Areas should be recognised as buffers between sub regions.</p> <p>Good management of rural areas is vital for the environmental health of the region. Some of these points are well articulated in Chapter 11, but it is both inconsistent and wrong for them to be undermined by para 4.22. We continue to object to the approach of 'diffusing' rural through the Plan as demonstrated in Box SP3, and not having an SP Policy on Rural matters in the spatial strategy.</p> <p>The proposed text takes a helpful protective approach to rural areas, but does not focus on the need to support positive planning in rural areas to maintain and develop thriving and socially inclusive rural communities.</p>	Object: see comments

			<p>We suggest the following amended text to replace the first proposed paragraph of new text (paragraph 4.22 in the companion document):</p> <p><i>“The region’s countryside is punctuated by the small towns and villages that contribute to the particular character of the region, and which provide homes, jobs and services. These settlements are often seen as desirable by those living and working in the region’s urban areas, increasing pressure for new homes, recreational activity and for workspace in the countryside. The housing growth proposed in this Plan will add to this pressure, and while the focus for development will be at the larger cities and towns in the region, it may be necessary for local authorities to plan for some new development at the smaller towns and villages. When this is considered necessary, Development Plan Documents must ensure that new development is located where it will increase local self-sufficiency and tackle identified deficiencies, whilst protecting, and where possible, enhancing the quality and character of the wider countryside. The objective must be to ensure that rural communities are viable and sustainable.”</i></p>	
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Section B – Core Regional Policies – Chapter 5 Cross Cutting

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
CC1 Sustainable Development (Chap 5(5))	Section D1: CC1	<p>Policy has been amended to include priorities from the Regional Sustainability Framework (replacing original sustainability objectives). Reference added to role of other organisations in delivering RSF.</p> <p>The change removes the reference to living within environmental limits.</p>	<p>Changes accepted – it is sensible to make explicit reference to RSF and need for others to help deliver it.</p> <p>Oppose the removal of the need to live within environmental limits.</p> <p>The South East as a region is already living at or close to its environmental limits with respect to water supply and waste water, as well as in other ways such as air quality. It is vitally important that for a region focussed on growth these limits are visibly acknowledged (in policy) and acted upon.</p>	<p>Object to some changes; Support the RSF</p> <p>Add point to CC1: (v) Live within environmental limits.</p>
CC1 Supporting Text (Chap 5(6))	Section D1: para 1.4	Amended text to support policy changes and reduce length.	Accept	Support



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CC3 Resource Use (Chap 5(10))	Section D1: CC3	<p>Policy amended to require action by a range of organisations.</p> <p>With respect to water the policies are unchanged from the draft RSS</p>	<p>We accept these changes, but need to ensure that indicators are in place to measure change and actions (in the IP) to achieve and monitor change. All the main points are included and should provide useful guidance and references for Local Authorities.</p>	<p>Accept; see comment</p>

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CC3 Supporting Text (Chap 5(11))	Section D1: para 1.6	Additional text added referring to ecological footprint definition and need to make sure measures are in place to offset potential effect of increased growth on increasing the footprint. Reference to RES sustainable consumption and production aims.	Accept - although the 'reasons' for the change refer to carbon footprint rather than ecological footprint. Reference to RES aims to reduce ecological footprint is overstated, given its limited influence, and too much reliance is placed on this.	Accept

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CC4 Sustainable Design and Construction (Chap 5(12))	Section D1: CC4	Amended to apply to 'development' (rather than individual buildings) and reference to exceeding Building Regs standards for energy and water efficiency is deleted. (The SoS does not accept the Panel's recommendation, due to the Government's commitment to timetable for zero carbon homes made since EiP, and does not support a region-wide requirement for demanding standards). Reference added to decentralised and low carbon energy sources as well as renewables (PPS1).	<p>We note the SA's recommendations that CC4 should include reference to delivering development that incorporates higher environmental standards.</p> <p>We object to the non-acceptance of the Panel's recommendation to seek the highest possible sustainability rating in the Code for Sustainable Homes. We consider that in the South East there is a strong case to demand higher standards in order to address issues acknowledged in the Plan, for example the fact the some areas are under serious water stress.</p>	<p>Object</p> <p>The region needs higher standards and there should be leadership from the Plan for this.</p>

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CC4 Supporting Text (Chap 5(13)-(14))	Section D1: para 1.8	Text amended to include reference to role of sustainable construction in combating climate change and reducing ecological footprint and protection of soils.	Accept	Accept

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Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
CC4 Supporting Text (Chap 5(16))	Section D1:para 1.9	New text reflecting Panel recommendations: - Reference to government commitment to improving Building Regs for energy and water efficiency and Code for Sustainable Homes. - Reference to case studies of good practice in the region. - Reference to PPS1 and ability of LPAs to set higher standards for sustainability (especially energy and water efficiency) in DPDs where circumstances allow or justify (referring to PPS1). - Reference to retrofitting responsibility of LPAs under HECA.	Accept, given PPS1. Policy and text could provide more encouragement to LPAs to pursue higher standards in DPDs for water efficiency, given the status of the whole region as in 'serious water stress' and targets in DEFRA Water Strategy, and the RES for reduction in water consumption. There is a need to change behaviour to achieve this.	Accept

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CC5 Supporting an Ageing Population (Chap 5(17))	Section D1: CC11	Reference to lifetime homes updated to National Strategy for Housing in an Ageing Society.	Accept as more relevant reference which encompasses lifetime homes, but also broader approaches – this is one element, but a number of approaches are required.	Support  Pleased to see this here.

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CC6 Sustainable Communities and Character of the Environment (Chap 5(19))	Section D1: CC12	Policy title has been changes from 'Character of the environment and quality of life' to 'Sustainable communities and character of the environment'. Policy has been reordered, and reference to promoting sustainable communities and designing out crime has been added.	CC12 had a clear focus on the environment and quality of life, and good design as part of this. Much of that has been lost in the re-working.	Object  Return to focus on quality of life and sense of place.

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CC7 Infrastructure and Implementation (Chap 5(21))	Section D1: CC5	<p>Policy has been amended in line with the Panel's recommendations with some changes. Policy states that the scale and pace of development will depend on sufficient capacity being available in existing infrastructure to meet the needs of new development. Text relating to 'sufficient capacity in existing infrastructure to meet the area's current needs' has been deleted.</p>	<p>We have concerns about the deletion of reference to sufficient capacity in existing infrastructure. The Panel suggested that this reference be retained, and the SoS does not respond to the SA's recommendation that the policy should retain reference to the area's current and future needs. The policy should not solely address growth, but also regeneration.</p>	Object
		<p>The policy states that where it cannot be demonstrated that sufficient capacity is available in new infrastructure to meet the needs of new development the scale and pace of development will be dependent upon additional capacity being released through demand management, better management of existing infrastructure, or provision of new infrastructure. Where new infrastructure is needed a programme of delivery should be agreed before development begins. Reference in clause (iii) that development shall not proceed until the LPA is satisfied that the necessary infrastructure is or will be available in time has been deleted.</p>	<p>The proposed new policy wording goes some way to ensuring the timely delivery of infrastructure. However, we have some concerns over the proposed emphasis on behaviour change and demand management to free up capacity, as:</p> <ol style="list-style-type: none"> <li>1) behaviour change and demand management are key aspects of the overall strategy of 'manage and invest' and serve to provide wider social and economic benefits, and it is misleading to present them in this narrow context.</li> <li>2) these mechanisms are unlikely to free up sufficient capacity in infrastructure to meet the needs of new development – the policy should be clear that additional capacity in existing infrastructure to deliver growth may be possible once usage has been reduced below maximum stress levels.</li> </ol> <p>Conditionality of releases of land on the provision of infrastructure should be maintained. Release of additional infrastructure through better management of existing infrastructure, while supported in principle, cannot be a substitute for new infrastructure in the context of house building on the scale envisaged. It would eliminate hopes for integration of new development into existing communities. Nor would the PC deal with the existing backlog in infrastructure provision to be found in much of the region.</p>	Object

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		<p>Policy strengthens requirement that LDDs will identify the necessary additional infrastructure and services required. A new para has been added requiring that phasing of development be closely related to the provision of infrastructure, and setting out that a proactive approach to funding will be adopted, including pooled contributions, tariffs, local delivery vehicles and forward funding mechanisms.</p> <p>This must be a key area to focus on in plan, monitor and manage.</p>	<p>We welcome the reference to phasing in this policy. However, we have concerns that this approach is not carried forward into the rest of the Plan, notably with regard to housing delivery. It is important that reference to the role of phasing development is picked up in Policy H2 on housing delivery to avoid confusion; also that reference to phasing be reinstated in those sub regions facing considerable amounts of growth, and where phasing has been identified as key to the delivery of the wider sub-regional policy objectives.</p>	<p>Object; see comment</p>
		<p>Policy identifies that funding will be provided by a combination of central government, local government and private sector partners.</p>	<p>We welcome the commitment within policy for central government funding to deliver infrastructure to support growth.</p>	<p>This should be included in monitoring criteria.</p>

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CC7 - supporting text Box CC2 (Chap 5(23))	Elements in the front part of the Implementation Plan	<p>Supporting text now includes a definition of 'infrastructure'</p> <p>The Proposed Changes have taken the definition of infrastructure from the draft Implementation Plan.</p>	<p>The definition of transport infrastructure should make reference to cycling and walking.</p> <p>The need for Gypsy and Traveller sites should be noted in regard to housing infrastructure.</p> <p>Waste disposal, water supply and waste water are key Public Services.</p>	Object

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CC8 Green Infrastructure (Chap 5(24))	N/A	New policy on Green Infrastructure, requiring the planning, provision and management of networks of multi-functional green space, especially in areas close to sites of international ecological importance and in areas identified for significant growth.	<p>Addition of new policy supported, expands on references to GI in draft Plan and gives issue more weight. This definition is helpful partly because it helps to clarify that GI is <u>not</u> open countryside (nor probably much of the GB which is actively farmed.</p> <p>Green Infrastructure will make urban areas more attractive places to live. In the absence of green belt, the undeveloped land within strategic and local gaps may form a ready Green Infrastructure within the more urbanised parts of the region, especially in certain growth areas and sub-regions. GI is not solely for maintaining and improving biodiversity. Equal weighting to be given to recreational, cultural and health benefits. As highlighted in Chap 5 (25) GI should be multi-functional.</p>	Support ; see comment
N/A	Section D1: CC7	Deleted. Text on inter-regional working included in Chapter 26. It is very unfortunate that inter-regional issues are downgraded – they are vital in Transport, and in ‘working with the influence of London’; SW as well as East of England and East Midlands are also important strategically, as well as locally.	General thrust of draft policy reflected in proposed text in Chapter 26. However, we would like to see reference to links to other regions, in addition to East of England and London.	General comment

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Chap 5(29)	Section D1: CC10a	Policy on green belts, including possible selective reviews, moved to Chapter 4 of Proposed Changes.	We are opposed to the amended policy that allows for selective reviews in the green belt. It is the integrity and permanence of the green belt that is most important to retain. A widely acclaimed aspect of the Plan is the ability to provide housing without recourse to the use of green belt land.	Object

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 5 Cross Cutting

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Chap 5(30)	Section D1: CC10b	Deleted.  Strategic gaps policy to be removed from the Plan, though still allowing for local gaps to be tested through LDDs.	<p>We object to the deletion of this policy. Strategic gaps provide an important means of preventing the coalescence of settlements at a sub-regional level, in circumstances where there is not express reference to gaps in national policy guidance.</p> <p>Not enough attention is being given to identifying strategic gaps in the context of continuing development in settlements that are less than 5 miles apart. Strategic gaps should be identified and the policy should be more widely applied. There is no clear rationale when a case is presented that would result in coalescence of two or more towns. In particular, the character and identity impacts of the proposals should be carefully considered.</p> <p>Strategic gaps have been repeatedly accepted and supported at appeal by planning inspectors, and also retain wide public recognition and support.</p>	Strongly object

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Chapter 6	Section D2	Chapter 6 has been renamed 'Sustainable Economic Development'.	<p>This appears to coordinate spatial approach with the RES. The key issue is to monitor that it is sustainable in the wider sense.</p> <p>Chapter 6 is not sustainable as it focuses on development alone – the use of the word 'sustainable' is devalued. The Plan focuses too much on narrow indicators. Looking at quality of life provides a broader approach which would better take into account the Plan's cross-cutting policies; social, environmental and economic.</p> <p>It is unacceptable that the government should state that quality of life will be affected as a result of the housing targets, without any mitigating strategy being proposed.</p> <p>Quality of Life should be at the heart of the Plan, which does not fully take account of quality issues, with contradictions in proposed actions and statements of intent. Plan, monitor and manage has been demoted.</p>	Object

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
RE2 Supporting Regionally Important Sectors and Clusters (Chap 6(4))	Section D2: RE1	The policy has been amended in line with the Panel's recommendations to include references to international business activity.	We accept this change which recognises the need to support national as well as regionally important sectors and clusters.	Accept

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
RE3 Employment and Land Provision (Chap 6(7))	Section D2: RE2	<p>This policy has been amended to incorporate the Panel's recommendations to:</p> <ul style="list-style-type: none"> <li>- strengthen the guidance on joint employment land reviews;</li> <li>- amend the locational criteria for identifying new employment land;</li> <li>- include the need to safeguard key marine-related sites; and</li> <li>- emphasise the need to be proactive in planning for and managing an appropriate supply of employment land. The policy wording has also been amended by the SoS to emphasise the necessity of a robust evidence based approach, and emphasise the importance of addressing particular needs of rural communities.</li> </ul>	<p>The main changes are acceptable, but a stronger emphasis base could be given to joint employment reviews, identification of strategic employment sites, marine-related sites and needs of rural communities.</p> <p>The second paragraph in the policy does not add anything additional to the third paragraph, and the requirements for RSS and LDFs as set out in PPS4.</p>	<p>Object: wording should recognise need for change and adaptability in rural economies.</p>

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
RE3 Supporting Text (Chap 6(9))	New	A table has been included in the supporting text showing a job target or monitoring estimate for each sub region and the remaining areas of the region. This incorporates the Panel's recommendation, but inserts it as an 'interim' table due to the SoS's concerns over the figures.	The job figures presented will be of limited use for individual districts when it comes to preparing their LDFs, as they are not provided on a district basis. This, together with the acknowledged lack of robustness of the figures, leads us to conclude that the inclusion of any figures is of little value, even as only indicative, pending the proposed early review of the RSS on employment land. Consequently, we object to the proposed change.	Object
		Text has been added recommending an early review of RSS on employment land, in line with the Panel recommendations.	We accept the need for the review, including developing an evidence base with SEEDA and building on joint employment land review work.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
RE4 Human Resource Development (Chap 6(10))	Section D2: RE3	The wording of clauses (ii), (iii) and (iv) have been amended to include information relevant to the whole region from policies SH9 (South Hampshire) and SCT5 (Sussex Coast) as per Panel recommendations.	We accept the changes to clause (iii) and (iv); and the addition of clause ii which outline skills needs in the region.	Accept
			<p>The implications of longer working lives (e.g. on housing, infrastructure, the wider economy) are not considered in any depth in the Plan (RE4 / RE5), whereas an ageing population is a major element of demographic projections. This is another example of the lack of coherence of the Plan.</p> <p>Effective training (i.e. importance of life-long training, as working lives increase) needs more emphasis.</p>	Amend

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 6 Sustainable Economic Development

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
RE5 Smart Growth (Chap 6(12))	New (and deletion of RE4)	A new policy has been added in line with the Panel's recommendations. It supports smart growth as an objective to be pursued throughout the region and incorporates the policy content of Policy WCBV5 (Western Corridor/Blackwater Valley). The ICT aspects of draft Policy RE4 have also been incorporated. The SoS has also amended the policy wording to align it with the RES in terms of Smart Growth.	<p>We welcome these changes to incorporate the policy content of the Western Corridor and Blackwater Valley policy in this section of the Plan, along with the other associated amendments.</p> <p>Local authorities should also work with environmental partners within the region to ensure that growth really is 'smart'. Thus ensuring it is helping to stabilise and then reduce the region's ecological footprint.</p>	<p>Welcome</p> <p>Comment</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 7 Housing

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
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Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 7 Housing

			Policy H1 should make it clear that a 'clean slate' applies at 2006. It should also clarify that the residual requirement approach should apply within the RSS period, allowing local authorities to manage their land supply and deliver development in a sustainable way.	Amend
			The use of a minimum target represents a further element that has not been tested through the SA process. SA/HRA testing of extra growth in the Plan resulting from planning applications does not cover their cumulative or strategic impacts.	Comment
			There is an over-reliance on strategic evidence - the NHPAU supply range advice, two rounds of official household projections and three rounds of official population projections - that has not been tested through the EIP process.  There needs to be a sensible judgement of what is reasonable and realistic. Fundamental changes in market conditions render much of this evidence, particularly that provided by the NHPAU unsound and therefore of questionable value.	Object: see comment
			The wording of the sub-regional and areas outside sub-regions housing policies should be consistent with one another and with the wording in Policy H1.	Amend
		Table H1a - Policy H1 now includes figures for the sub-regional and rest of county areas (as well as individual districts). Figures have been increased in all areas except: South Hampshire, Isle of Wight and Rest of Berkshire.	There appear to be errors within the calculations for MK/AV and Rest of Bucks, which should read 3,693 per annum and 185 per annum respectively.	Correction
		Table H1b - Policy H1 includes a revised district housing distribution, also expressed as minimum annual averages. Many of the Panel's recommendations have been taken on board, though there are some notable additional increases for a number of districts.	The evidence-base for a number of the district increases relies heavily on emerging local studies that have not yet been properly tested through the LDD process. The robustness of a district level housing distribution rests heavily on the use of regionally consistent and up-to-date evidence. The weight attached to untested evidence, together with housing trajectories which are by their nature a snapshot at a point in time, and/or historic completions data (high or low) is uncertain. This is not a justification for future levels of housing provision over the long-term, and calls in to question the robustness of a number of changes proposed for district figures.	Object  District increases should only be included where districts have indicated they can support them without unjustified imposition.

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

		<p>Table H1b - A number of districts have been allocated additional long-term growth justified on the basis of their Growth Point status.</p>	<p>CLG confirmed at the EIP that Growth Point status applied to the period to 2016. Longer-term potential at the Growth Points is a matter for the first RSS review.</p>	<p>Object  Clarity is needed as regards expectations of the planning system.</p>
		<p>Table H1b - Policy H1 includes a number of SDAs: Shoreham Harbour (new, separately identified); Whitehill/Bordon (new, separately identified); Aylesbury Vale (newly quantified, not separately identified); Fareham (as set out in the South East Plan); North/North East of Hedge End (as set out in the South East Plan); South Oxford (as recommended in the Panel Report); Milton Keynes (existing and new, not separately identified). In addition, the figure for Runnymede includes 2,500 dwellings at the DERA site to be divided between Runnymede and Surrey Heath and the figure for Wokingham 2,500 related to the expansion of Reading. Greater Reading; SDA accepted by the Panel was removed.</p>	<p>The treatment of SDAs in Policy H1 is inconsistent. Not all SDAs are separately identified. For example, the DERA site has no separate allocation within Policy H1 (though it is covered by a footnote) and other SDAs receive no specific mention either in the table or footnotes.</p> <p>The policy should be clearer as to the rationale for separately identifying SDAs within Table H1b and apply the reasoning on a consistent basis. There is no case for a review of the Oxford Green Belt to accommodate an SDA south of Oxford. SDA at SW Reading should be further tested against NRM4 and NRM5.</p>	<p>Object SDAs should be treated transparently and separately. These proposals should be considered at the first Review, not assumed in a statutory plan at this late stage.</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<p>H2 Managing the Delivery of the Regional Housing Provision (Chap 7(6))</p>	<p>New (old H2 deleted)</p>	<p>A new policy designed to provide policy guidance on the regionally specific aspects of the delivery framework. Local authorities are required to work in partnership to deliver housing provision, while having regard to environmental and infrastructure issues. Local planning authorities are also required to take account of: longer-term issues arising from eco-town and growth point proposals; accelerating housing delivery in Growth Areas and Growth Points; maximising the scale and pace of development in named strategic locations; additional sources of PDL; delivery capacity unlocked by infrastructure; and, addressing the backlog of unmet housing need.</p> <p>Planning authorities are required to plan for upward trajectories of housing completions.</p>	<p>This new policy introduces the requirement for local planning authorities to consider strategic and long-term growth. Not only are these matters more appropriately dealt with by the RSS review, but they would make additional complex demands on the LDD process over and above the requirements to produce SHMAs, SHLAAs etc. It is vital that LAs who are charged with implementing the RSS on the ground consider long term and strategic issues. Too often they work parochially, with unfortunate results. LAs urgently need to review the situation on the ground with regard to future market conditions, and their ability to secure housing and other development that they need in a sustainable way.</p> <p>Policy H2 should expressly identify the way in which local authorities are expected to manage the land supply to deliver planned levels of housing provision.</p> <p>An alternative policy is required, which recognises challenging market conditions. Such a policy would be based around phasing, if necessary, lower targets, in some areas at least in the short to medium term, and policies in line with a plan, monitor manage approach. Evidence to Treasury select committee given by Chief Economist at Morgan Stanley highlighted the dangers of pursuing a house building target that was too high, and could result in undermining an early property market recovery.</p> <p>Further consideration is needed regarding the potential impact of new growth points e.g. Basingstoke. Little coherence of the various designations ('centres for significant change', etc. in relation to the sizes of the sites. Centres for significant change – combine large conurbations &amp; smaller communities. There was no prior public consultation on growth points (e.g. Dover), and there is no consistent criteria applied. Lack of integrity in vision (with conflicting footnotes) Considering the recent changes to the housing market, we wonder if the Plan will stand the test of time, when recent events already seem to undermine some of its basic assumptions.</p>	<p>Object</p> <p>This is a wholly unreasonable imposition on local authorities, which have the ability of early reviews of core strategies.</p> <p>It is unrealistic in the present climate for LAs to plan for upward trajectories of housing completions. They need to consider realistic and more likely trajectories.</p>

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
H2 Supporting Text (Chap 7(7))	New		Policy H2 supporting text should include the section on P-M-M currently located in the chapter on Implementation, Monitoring and Review, plus a list of the tools with which local authorities should manage the process of housing provision. It should also cross-refer to Policy CC7 'Infrastructure and Implementation'.	Amend
		The RSS will need to be reviewed to plan for additional and longer-term housing growth.	<p>The question of whether any additional growth over the period 2006-2026 is appropriate is for testing through the RSS review and should not be pre-judged in this document. Suggest the wording is changed to: 'The RSS will need to be reviewed to plan for any additional growth to 2026 and longer-term housing growth'.</p> <p>Again oppose the housing numbers being minima. If LAs are to test higher numbers this will make assessing the cumulative environmental impact of development in the region very difficult. This is the role of the regional level SA, and it is being undermined by this recommendation.</p>	<p>Object</p> <p>Extending the Plan period to 2031 may be preferable to align with East of England.</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Policy H3 Affordable Housing (Chap 7(11))	Section D3: H4	The regional targets for social rented housing (25%) and other forms of affordable housing (10%) have been retained.	<p>It is not clear why the Proposed Changes retain the terminology 'other forms of affordable housing' in the policy rather than using the term 'intermediate housing' as set out in PPS 3. This also means that there is inconsistency between the terminology in the policy and the definition included in the text.</p> <p>Greater flexibility is needed in other forms of affordable housing (10% - 15%) in Rest of County areas to meet local needs.</p>	Amend
		The policy has been amended and re-ordered to stress the relationship with the RHS and other strategies relating to the delivery of affordable housing and to include cross-references to sub-regional affordable housing targets and clarification of their relationship to the regional targets. The policy incorporates the Panel's recommendation that the policy includes a reference to lower site size thresholds.	The recognition of the importance of the Regional Housing Strategy and inclusion of the reference to sub regional targets are welcome changes that strengthen the policy. The amendment to encourage locally set thresholds was widely supported at the EIP.	Support

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
H3 Supporting text (Chap 7(15)-(17))	Section D3: Paras 5.1 to 5.6	<p>The supporting text on affordable housing has been substantially re-worked to refer to Housing Green Paper targets, funding arrangements agreed by the RHB, cross-boundary SHMA work, along with a new paragraph on affordable housing in rural areas.</p>	<p>Although the Proposed Changes have accepted the Plan's evidence base underpinning the affordable housing targets, the consequences in terms of investment have not been followed through. The supporting text fails to acknowledge the extent of additional investment that will be required to deliver the affordable housing targets identified in the Proposed Changes. The need for additional investment was highlighted by the Panel. The RHB estimated that an additional £400m was required over three years to meet the level of affordable housing provision proposed by the Panel. The shortfall against the level of provision now proposed by Government will be even greater.</p>	Object
			<p>Nor does the supporting text make it as clear as it might the relationship between regional and national targets for affordable housing, or the relationship between the RSS and RHS. PPS 3 makes it quite clear that the RSS should set out the affordable housing target for the region: reference to Housing Green Paper targets is no more than background, but its inclusion is confusing. The RHS is, in effect, a delivery mechanism for the RSS, with the priorities for public expenditure on housing based on objectives set out in the statutory spatial strategy.</p>	Amend

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
H4 Type and Size of New Housing (Chap 7(12))	Section D3: H6	The policy has been updated to reflect PPS 3 and associated guidance on joint working, incorporating the Panel's recommendations.	Although part of the rationale for changing the policy is to encourage joint working of a broader nature than between adjoining local authorities, the Proposed Changes delete the reference to adjoining local authorities and do not replace it with a reference to joint working.	Amend
		The policy has been updated to reflect other aspects of PPS 3 and associated guidance, incorporating the Panel's recommendations.	The policy now refers more explicitly to the requirements for LDDs to identify the profile of household types requiring market housing and the size and type of affordable housing required, and a mix of site allocations to encourage a range of housing types.	No objection

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
H3 and H4 Supporting text (Chap 7(13)-(21))	H4 (paras 5.1 to 5.6) and H6 (paras 7.1 to 7.2)	The policies on affordable housing and housing type and size have been grouped together and now share supporting text.	Accept, but H3 (v) should emphasise the need to provide affordable housing for people who are part of those rural communities, such as by family ties.	Comment

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
H5 Housing Density and Design (Chap 7(22))	Section D3: Policy H5	The order of the policy has been reversed to emphasise the need to seek high quality design and sustainability, incorporating the Panel's recommendation.	Accepted and welcomed.	Support

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
H5 Supporting Text (Chap 7(23))	Section D3: Paras 6.1 to 6.2	The supporting text has been amended to reflect the Panel's recommendations. It now notes that local authorities may set higher or lower density targets than 40dph, including acknowledging that lower densities may be appropriate in rural areas. The text expanded to refer to climate change mitigation.	Accepted. There was much discussion at the EIP regarding 'appropriate densities' in urban as well as rural areas.	Accepted and welcomed.

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
H6 Making Better Use of the Existing Stock	Section D3: Policy H7	No changes to policy or supporting text.	Accept	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
Text on Gypsies and Travellers (Chap 7(25)-(26))	Section D3: Paras 9.1 to 9.7	The text has been updated to reflect the fact that the partial review is underway.	The supporting text should also note that the scope of the partial review has been expanded to address the needs of Travelling Show people, in accordance with Circular 04/2007 'Planning for Travelling Show people'.	Accept: see comment

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 7 Housing

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
N/A	H2: Delivering Adequate Levels of Housing	Policy deleted, reflecting the Panel's recommendation.	Following the publication of PPS 3, the need for H2 disappeared. Policy CC7 (Policy CC 5) in the Draft Plan states that the phasing of development will be closely related to the provision of infrastructure.	Support
N/A	H3: The Location of Housing	Policy deleted	The Proposed Changes take the view that Policy H3 and the supporting text was largely superfluous, repeating what had already been covered in other policies. The urban focus of Draft Plan Policy H3 is now included in Policy SP3, including the 60% target for PDL. The need for rural housing is captured in the Proposed Changes Policy H2.	Accept
		Policy deleted	It is not clear whether the 60% target in SP3 applies to housing as well as all new development.	Amend

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T1 Manage and Invest (Chap 8(8))	Section D4; T1	Minor changes to policy to reflect DfT policy on sustainable travel (replacing 'non-car' with 'sustainable' at criteria ii).	Takes forward the RTS approach, and links it to development and transport plans. Change appears to weaken the focus of the policy.	Object

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T1 supporting text (Chap 8(9)-(11))	Section D4; paras 1.8-1.11	Additions to supporting text setting out the key components of 'manage' and making the connection between the overarching strategy of 'manage and invest' and mobility management.	We accept the change as it provides clarification on the 'manage' element of this overarching concept, and identifies how this is delivered by mobility management.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T2 Mobility Management (Chap 8(12))	Section D4; T5	Policy moved to strengthen messages about demand management in the RTS in line with Panel report.	We accept the change as places greater emphasis on demand management in the RTS.	Accept
		Policy amended to require LDDs and LTPs to include mobility management policies, re-order the list of measures, and add a reference to car clubs in line with Panel report.	We accept most changes. However, this should require LDDs and LTPs to include mobility management measures rather than encourage them.	Accept: see comment

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T2 Supporting Text (Chap 8(14))	Section D4; para 1.18	Additional paragraph is proposed setting out importance of demand management in the RTS and identifying that sub-regional strategies indicate the likely mix of such measures and that any future reviews of the RTS should consider regional standards of public transport accessibility.	Change accepted as it is in line with the Panel report and places greater emphasis on demand management in the RTS.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T3 Charging (Chap 8(15))	Section D4; T6	Policy moved to strengthen messages about demand management in the RTS, in line with Panel report.	Accept change as places greater emphasis on demand management in the RTS.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T4 Parking (Chap 8(19))	Section D4; T7	Policy moved to strengthen messages about demand management in the RTS, in line with Panel report.	Accept change as places greater emphasis on demand management in the RTS.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T4 Supporting Text (Chap 8(20))	Section D4; para 1.22	Supporting text amended to include reference to draft PPS4, indicating that policy T4 (Parking) will need to be viewed in light of the outcome of PPS4 consultation.	Amendments to supporting text are not supported. Oppose aspects of the PPS4 Parking policy as it loosens standards.	Object

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
T5 Travel plans and advice (Chap 8(21))	Section D4; T8	Policy moved to strengthen messages about demand management in the RTS.	Proposed change is in line with Panel Report, with greater emphasis on demand management.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T5 supporting text (Chap 8(23)-(24))	Section D4; para 1.23	New supporting text to strengthen the demand management message highlighting the role of LAs in engaging the public, business community, health and education sectors and transport industry in partnership that promotes coordinated development of travel plans; stating that LAs should implement their own travel plans and put in place monitoring mechanisms; indicating that LAs should actively support travel plan initiatives taken by private sector companies/ other organisations.	Additions reinforce the role of travel plans in demand management and set the context for local authority action in this regard, particularly in relation to monitoring.	Support

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T7 Rural Transport	Section D4; T2	<p>Policy moved as consequence of moving other policies forward to strengthen messages about demand management in the RTS, in line with Panel report.</p> <p>Little new guidance regionally as to a more comprehensive approach to the needs of rural communities.</p>	<p>Accept change as reflects emphasis for demand management in the RTS, and no alterations made to the content of the policy.</p> <p>Rural accessibility was covered in the sustainability appraisal, with many issues identified. Rural road footways, for example, have disappeared in order to widen the roads for two way car traffic and for larger agricultural vehicles. These conditions are unsafe in many areas and parish councils attempt to achieve traffic calming with little support. It is important to the character, tranquillity and safety of the countryside in the South East that these issues are acknowledged and actioned in an RSS that has a vision of creating a healthier region and confirms the importance of quality of life.</p>	<p>No objection</p> <p>Greater recognition of the need for a co-ordinated approach to rural transport provision.</p>

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T8 Regional Spokes	T3	Policy moved as consequence of moving other policies forward to strengthen messages about demand management in the RTS, in line with Panel Report.	We accept the change as it reflects the emphasis for demand management in the RTS, and no alterations are made to the content of the policy.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T9 Airports Chap 8 (30 – 32)			Acknowledgement should be given to the environmental impacts of airport expansion, including noise, emissions, and increased demands on infrastructure. The supporting text should acknowledge this and explain how these impacts will be mitigated.	Amend

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T10 Ports and Short Sea Shipping (Chap 8(34))	Section D4; T10	Policy amended as suggested in the revision tabled by the Assembly to support Port Master plans and clarify port roles, naming Southampton first in the list of Gateways.	<p>Accept change as in line with changes suggested at the EIP, and reference to major ports producing master plans is in line with the Ports Policy Review.</p> <p>Accepting the role of Southampton does not mean an acceptance of any expansion, as envisaged in the previous Dibden Bay deep water port proposals.</p>	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T11 Rail Freight (Chap 8(39))	Section D4; T12	Policy moved before policy on freight and site safeguarding to give more prominence to rail freight amongst the freight policies, in line with Panel report.	Change gives more emphasis to more sustainable methods of freight transportation within the RTS.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T12 Freight and Site Safeguarding	Section D4; T11	Rail freight policy moved before this one to give more prominence to rail freight amongst the freight policies, in line with Panel report.	Change gives more emphasis to more sustainable methods of freight transportation within the RTS.	Accept

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
T14 Transport Investment and Management Priorities (Chap 8(45))	N/A	New policy added to accord with Panel report, which indicates that the transport schemes of key regional importance should be mentioned in the Plan, and that this list be included in the text at the end of the transport section as regionally significant transport infrastructure.	The addition of Appendix A appears to fulfil the Panel recommendation, but there was no direction towards a new policy in the Panel report. However, the new policy establishes a link to the implementation plan, and need for review of this plan, working in partnership; it sets priorities for future investment relating to demand management, making best use of existing infrastructure, promoting sustainable travel and reduce demand by behavioural change; it provides a link between the projects in the Plan and the Development Plan.	No objection
		As above	The policy gives priority to demand management measures, those that make best use of existing infrastructure, and promoting sustainable travel, in developing schemes additional to current commitments. This wording contradicts the supporting text, which is more appropriate.	Amend Or 'accept subject to amendments'

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Diagram T1 International and Inter-Regional Corridors (Chap 8(37)-(38))	Section D4; Map T1	Diagram has not been amended to include deep water channel from the port of Southampton to the main shipping lanes and the offshore shipping routes (as recommended by Panel). The SoS considers it is difficult to see added value; it is a matter for ports to decide which access routes they maintain; it would be inconsistent with other regions.	Accept not including this on diagram T1, as not included in the draft Plan.	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 8 Transport

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Diagram T2 Regional Hubs and Spokes (Chap 8(27))	Section D4; Map T2	Regional spoke from Dover to Thanet not added (although Panel recommended this).	The RTS, diagram T2 and SoS reasoning justifies why this is not included as a regional spoke, against the Panel report. However, it is included in the sub-regional strategy for East Kent and Ashford and should be confirmed.	Amend
		Dover included as a regional hub (to take account of Panel recommendation). The SoS accepts Dover District Council's claims that Dover should become a hub - it is a highly accessible settlement of regional significance that should be the focus for development and investment.	Dover should be a hub, but this does not justify additional housing growth.	Accept

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<p>Introductory supporting text (Chap 9(3))(Box NRM1)</p> <p>Separation of water resource and water quality issues.</p>	<p>Section D5; paras 2.1-2.12</p>	<p>Deletion of word ‘Sustainable’ from title. Tabulated summary of region’s key environmental challenges. References to tranquil areas and role of design in flood risk areas are welcome additions.</p> <p>We are concerned by the split of NRM 1 and 2. The proposed change has NRM1 focus on water resources and NRM2 on water quality.</p>	<p>Accept and welcome – also helpful linking of issues with policies. Word ‘sustainable’ should be reinstated.</p> <p>While we appreciate the reason for the Panel’s recommendation, the risk of making the split is that the management of water takes a less integrated approach than is necessary in the water stressed South East. Recycling of water should be considered as part of the long term sustainable pathway for the South East. That means giving greater attention to the high level of treatment of waste water and its discharge into rivers and potential indirect reuse downstream as part of a supply resource. This is mentioned in passing in para 4 of NRM3, but its importance to water supply modelling and management is not well recognised.</p> <p>Water supply and water quality have been separated for clarity of policy focus and implementation. However it is important to that in key aspects such as groundwater management and understanding indirect water reuse NRM1 and 2 are integrated.</p>	<p>Support – see comment</p> <p>Amend: see –</p> <p>Restore Figure NRM1, in the draft RSS, which although complex gives important guidance on how the many strands of water policy and plans come together, and are vitally interdependent.</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<p>NRM1 Sustainable Water Resources and Groundwater (Chap 9(4))</p>	<p>Section D5: NRM1</p>	<p>References to water quality and sewage treatment (clause ii) removed and new policy NRM2 inserted. Clause (vi) also moved to NRM2 and replaced by a new clause directing development to areas with adequate guaranteed water supply or phasing development until new capacity can be provided.</p> <p>The proposed changes would put the burden entirely on Local Authorities to make the case for higher standards in particular circumstances.</p>	<p>We support the inclusion of separate policies on water resources and water quality.</p> <p>Many parts of the South East are highly stressed: this applies to water supply and waste water. This situation does not exist to the same extent in other parts of the country. It is therefore surprising that there should be no policy at regional level for higher than national standards. We acknowledge that building regulations are higher than at the start of the SE Plan process, but the Code for Sustainable Homes under which the required levels of water efficiency for new homes could be achieved remains voluntary at the level required. Leadership is needed at Regional level. To leave it to local Authorities to make the case, on top of all the other points for Section 106, strategic tariff and affordable housing negotiations is unrealistic and unreasonable. A clear lead is needed to achieve higher levels (80%+) of metering in existing homes.</p>	<p>Support</p> <p>Amend NRM1, to establish that high standards will apply in zones of water stress, which includes almost all areas of the South East.</p>
		<p>Clause (iii) requiring developments to incorporate water efficiency to BREEAM standards deleted and replaced with one enabling LDDs to identify circumstances in which higher standards are justified. These changes are for consistency with CC4 and standards are a matter for national regulations which are currently being improved. Clause (iii) where it requires SuDS has been replaced by a new clause requiring LDDs to set out circumstances where SuDS should be incorporated into developments.</p>	<p>We oppose the removal of the clause requiring developments to achieve high levels of water efficiency. However, CC2 refers to achieving high water efficiency, so the clause should be more positively worded to allow identification of circumstances requiring higher standards – perhaps removal of 'any' and supporting text to refer to status of SE as in 'serious water stress'.</p>	<p>Object</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
NRM2 Water Quality (Chap 9(5))	Section D5: NRM1	New policy on water quality, drawing on original NRM1, reflects Panel recommendation.	Support	Support
NRM2 Supporting text (Chap 9(6)-(8))	Section D5: Para 3.1-3.5	Some text deleted for brevity and not directly supporting policy. Part of the paragraph has been moved from the introduction into this section.	Additional reference should be made to 'seriously water stressed' status of SE to make case for higher standards of water efficiency.	Amend
NRM2 Supporting text (Chap 9(9))	Section D5: para 3.7	The reference in the last two sentences to water efficiency was a recommended addition by the Panel to Policy NRM1 and has instead been included in the supporting text.	Supported, but it makes the case for retention of a requirement for efficiency in NRM1. These two sentences state that development is matched with substantial improvements in efficiency – at odds with the deletion of requirement in Policy NRM1.	Accept
NRM2 Supporting text (Chap 9(8))	Section D5: Para 3.5  Chap 9, para 9.8	New text identifies districts where there may be water supply constraints where significant new development should be directed to areas where supply can be guaranteed or phased, to avoid damage to SACs, SPAs or Ramsar wetland sites.  Paras 9.6 and 9.8 note that work is on going and new information will become available as a result of the implementation of the Water Framework and Habitats Directives.	Accepted - although more explanation of the issue in certain districts, and the match with EA modelling results, is required. The supporting text directs development in named LAs to areas where water can be supplied. Actions required if this is not possible should be stated.  Recognise the potential impact of the work by indicating in 9.8 that further review and debate with the water companies, developers, local authorities and communities as result of the EA findings is likely to be necessary. Also Integrated Water Management Strategies may be needed to find ways for housing targets to be met.  The supporting text underestimates the potential impact of this work, and the need for wider debate of human and environmental consequences when major constraints are indicated. To list 11 districts identified as constraints at this point in time could be unhelpful if at the first annual monitoring review the list is lengthened or changed.	Accept  Comment

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<p>NRM3 Strategic Water Resources Development (Chap 9(13))</p> <p>NRM3</p>	<p>Section D5: NRM2</p> <p>Para 5 bullets i, ii, iii</p>	<p>Policy amended to reflect the Panel's recommendation that counties in which main reservoir schemes are located should be included in clauses (i) to (iv). Reference to other schemes that may be required to deliver water has also been added to the policy wording.</p>	<p>The assumption of a UTR by 2020 should be fully tested, with other options remaining open. The UTR should be deleted from the list and referred to under a separate policy requiring more reasoned and detailed justification.</p> <p>Given that the policies and supporting text are proposed to be substantially changed for NRM1 and NRM2, we are surprised that there is not greater emphasis on the need for a sustainable hydrological case and land use opportunity cost case to be clearly demonstrated, in addition to the existing 3 criteria of need, alternatives and socio-environmental benefits set out in i) ii) and iii). This is vital as several of the proposals do have serious shortcomings especially when the rigors of the Water Framework Directive and the uncertainties of Climate Change are factored in.</p>	<p>Object</p> <p>Amend to include a 4<sup>th</sup> criterion that the water resource proposals should be sustainable, as required from Policy CC2.</p>

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
<p>NRM4 Sustainable Flood Risk Management (Chap 9(14))</p> <p>Policy NRM4</p>	<p>Section D5: NRM3</p> <p>Para 4 (ii)</p>	<p>The policy has been amended to reflect PPS25 in line with the Panel's recommendations, especially the need to apply the sequential test and the reference to surface water management plans.</p>	<p>There should be a reference to the importance of design and form of development in ensuring better flood risk management.</p> <p>We would recommend that text from Chap 9(15) should be reflected in this policy.</p> <p>We welcome the evolution of this Policy to take account of lessons learned from the 2007 floods, the guidance now available in PPS25, and the development of catchment and shoreline management plans. We are surprised that while para 9.14 as proposed does acknowledge there are 208,000 properties at risk areas, there is no follow through to policy, which focused entirely on the location of new development. The major policy initiative already underway of flood risk management including the issue of "managed retreat", is implied in NRM4 ii, but the human aspect only includes fisheries, not other coastal or river basin communities, which are larger in total.</p>	<p>Amend NRM4 ii to 'fisheries <i>and other communities</i> and biodiversity.</p>
<p>Policy NRM4 Chap 9 (16)</p>			<p>The sentence regarding EA having CFMPs ready for consultation in 2008 should be updated or removed. It is not appropriate to add this text to a long term, strategic plan.</p>	

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 9 Natural Resource Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
NRM5 Supporting text (Chap 9(22))	New	The HRA identified 7 sites for which it was not possible to conclude there would be no adverse effect from urbanisation. These have been included - by inference locations where a Thames Basin Heath (TBH)-style approach is needed.	Not certain whether a TBH-type approach alone is helpful at all those sites identified in the supporting text as an outcome of the HRA. May not overcome site specific issues that are not related to recreation and urban pressures, such as air quality	Comment

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 9 Natural Resource Management

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
NRM6 Thames Basin Heaths Special Protection Area (Chap 9(23))	New	New policy on TBH applying principles of Delivery Framework and incorporating, generally, the Panel's recommendations.	Accept as puts principles into statutory plan and so will have more weight and provide certainty (replaces WCBV9 and LF11).	Accept

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 10 Waste and Minerals

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
W17 – Location of waste management facilities			Oppose the proposal to delete ‘in exceptional circumstances’ and ‘where this is the nearest appropriate location’ with reference to small scale waste management facilities and national parks / AONBs. Caveats around the use of Green Belt land should also be reinstated.	Object

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C1 The New Forest National Park (Chap 11(4))	Section D7: C1a	Changes broadly in line with Panel report. Policy now includes reference to conserving and enhancing the specific character of the NP, and to the need for an emphasis of development to be on small scale proposals that are sustainably located and designed, and have regard to the setting of the Park. It also encourages proposals which support the economies and social well being of the Park and its communities.	Proposals to retain and strengthen policy are warmly welcomed.	Strong support

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C2 The South Downs (Chap 11(5))	Section D7: C1b	Policy has been reworded to clarify that pending a decision on the proposed South Downs National Park the purposes of its designation should be a material consideration in planning decisions.	<p>Proposed wording accepted, however the supporting text should make reference to the need to review regional policy once a decision regarding designation has been made.</p> <p>We would like an express reference to the <u>setting</u> of the National Park.</p>	Support Essential to provide for a situation in which the whole area is designated a National Park.

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

<b>Proposed Change Policy</b>	<b>Relevant draft Plan policy</b>	<b>Summary of main changes</b>	<b>Comments</b>	<b>Response summary</b>
C3 Areas of Outstanding Natural Beauty (Chap 11(7))	Section D7: C2	Policy has been strengthened in line with the Panel recommendations to require high protection to AONBs. Likewise, supporting text has been amended to refer to coastal AONBs and the further protection of landscapes down to the low water mark.	Proposals to strengthen policy are welcomed; however, AONBs should have the highest level of protection, in line with National Parks.	Support and amend

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C4 Landscape and Countryside Management (Chap 11(9))	Section D7: C3	Policy amended in line with Panel recommendations to include: - use of landscape character assessments to inform plans and decisions; - need for positive land management, including use of agri-environment funding and other management tools; - encouraging local authorities to develop criteria based policies in relation to local landscape character.	Restructured and strengthened proposals are generally welcomed, but there is an over-emphasis on the role of environmental scheme funding. This alone cannot be the basis of a vibrant and well-managed countryside. Sound economic and environmental practices by farmers and landowners are essential, and this should be recognised.	Accept with comment.  Such land management should not just apply to land outside nationally designated landscapes.

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
Chap 11(10) Supporting text			Too much weight is given to the role of agri-environment schemes. They are just one part of the wider RDPE and should be seen as such. We would therefore recommend that the sentence starting “A key tool...” should be removed as the following sentence on RDPE seems sufficient.	Accept; see proposed amendment

Comments from: CPRE South-East  
Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C5 Managing the Rural-Urban Fringe (Chap 11(11))	Section D8: BE4	<p>Policy has been amended to incorporate the Panel's recommendations. It has been moved from the Built Environment chapter and the title changed from Managing the Urban Rural Fringe. It now includes reference to the need for LDDs to plan positively for facilities connected to the sustainable management of urban areas; and to target management on areas where urban extensions are planned.</p> <p>Requirement to identify dereliction of fringe boundaries has been replaced with a reference to identifying <u>any parts</u> of the fringe that may become subject to dereliction (rather than boundaries). The reference for LAs to identify opportunities in the rural fringe for urban extensions has been deleted.</p>	<p>There are problems inherent in mapping fringe boundaries, and the EIP agreed that a change of emphasis - away from identifying urban extension areas towards prioritising areas already proposed for such extensions - was appropriate.</p> <p>It will be important for local authorities to find the time and resource to pay attention to this issue (which a sub set of GI), but is often ignored by work focussing on more on urban corridor GI rather than these difficult outer edges. A rethink of priorities may sometimes be needed at local level.</p>	<p>Accept; see comment</p> <p>This is an improvement, but it remains difficult to achieve the right focus. It will be important to monitor this topic in local authority action plans.</p>

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C6 Countryside Access and Rights of Way Management (Chap 11(13))	Section D7: C4	An additional clause has been added to the draft policy in line with Panel recommendations, which addresses the need to promote appropriate access and other management measures to avoid adverse impact from recreation on Natura 2000 and Ramsar wetland sites.	<p>Proposal in line with recommendations emerging from appropriate assessment of the draft Plan therefore supported.</p> <p>Promote partnership approaches to avoid conflicts.</p>	Support

Comments from: CPRE South-East  
 Section B – Core Regional Policies – Chapter 11 Countryside and Landscape Management

Proposed Change Policy	Relevant draft Plan policy	Summary of main changes	Comments	Response summary
C7 The River Thames Corridor (Chap 11(15))	N/A	<p>New policy inserted, in line with Panel recommendations, to encourage a co-ordinated approach to planning and decision-making along the River Thames.</p> <p>A detailed debate took place at the EIP on the regional role and recognition of the River. The Panel responded by suggested a new policy for the whole non-tidal Thames, encouraging riparian local authorities and others to work together to enhance the environment and resources of the River corridor.</p>	CPRE supports this change – it may set a model for other river basin work, where the river itself is particularly important.	Accept and welcome
			The broad landscape features of the South East should be described in the introduction to this chapter.	