

DRAFT SOUTH EAST PLAN

SUMMARY OF THE PANEL REPORT PREPARED BY THE SOUTH EAST ENGLAND REGIONAL ASSEMBLY

AUGUST 2007

Chapter 1 - Overview

- **Growth Levels**

The Panel acknowledges this as the single most controversial issue in the Plan and that the Assembly has had a challenging task in balancing all the different factors. However, it concludes that too much weight was given to the views of existing residents (i.e. the consultation results) and not enough to demographic and economic factors. As a result, the Panel recommends an increase in the overall levels of housing from 28,900 to 32,000 per annum (640,160 over the Plan period), an increase of 10% or in absolute terms - 62,000 new homes over the Plan period (2006-2026). Although the Panel recognises that this is still below the Government's latest demographic information and recent completions in the region, it has not gone any higher because of the strength of the Assembly's arguments and much of its background work.

On the distribution of housing provision, the Panel acknowledges that district by district figures will change over time as Local Development Frameworks are progressed and more detailed information is available on, for example, urban potential. Given their concerns about the Plan not fully taking into account economic factors, the Panel has tried to redress this by focusing most of the additional housing provision on the London Fringe, Central Oxfordshire and Western Corridor / Blackwater Valley to ensure that economic potential is not restricted.

The Panel makes it clear that just as important as getting the right numbers is getting the right type and size, particularly affordable housing. It therefore recommends that the housing policies dealing with this are strengthened. The Panel agrees with the Assembly that it is not simply a case of building our way out of the affordability crisis and encourage the Assembly to work closely with GOSE to influence funding of affordable housing.

- **Spatial Strategy**

The Panel endorses the need for a bold strategy that will endure for many years and not require an early review. It therefore supports the Plans' 'sharper focus' concept

and the proposed sub-regions, which remain unchanged in terms of their geographical basis. However, it recommends strengthening the strategy by making it more location specific and giving a stronger profile to areas south west of London, the Thames Valley and the Oxford area, reflecting their economic importance. Six Strategic Development Areas (SDAs) are proposed, each with 4-5,000 dwellings or more. These are at Fareham, north / north east of Hedge End (both are existing SDAs identified in the Plan) south west Milton Keynes, south east Milton Keynes (both are an endorsement of the MK2031 work), south Oxford and south Reading (these are the only two new SDAs identified).

- **Employment Land**

The Panel recommends an early partial review of the Plan to provide a clearer framework for economic development and employment land, once the employment land reviews currently underway, have been completed.

- **Infrastructure**

The Panel agrees with the Assembly's 'manage and invest' approach and recommends strengthening parts of this. It applauds the Assembly's 'pioneering work' on infrastructure. It feels that the Implementation Plan should be considered as a 'living document' rather than formally adopted as part of the RSS as this allows flexibility to keep it updated as local planning progresses. The RSS should be a firm basis for planning; hence the Panel recommends that housing figures should be treated as targets, to allow some certainty in terms of infrastructure investment. However, it does not agree that housing levels can be made contingent upon delivery of particular pieces of infrastructure as this would be unhelpful to investment.

- **Environmental Uncertainties**

The Panel acknowledges the changing requirements of the Habitats Directive and has therefore exercised some judgement on the effects of growth levels. In the Thames Basin Heaths, it has recommended an increase in the housing provision within the 5km radius, mainly within the London Fringe, which is to be provided later in the Plan period. If the Government accepts this, further SA/SEA and Appropriate Assessment work will be required before consultation on the proposed changes to the Plan.

Chapter 2 - Context and Soundness

The Panel is obliged to test the Plan against the 12 tests of soundness in PPS11. It concludes that in all but one test, the Plan is sound and with the changes recommended by them, can be even better. The one area that the Panel finds the

Plan unsound is on housing levels and it makes specific recommendations to address this, as already mentioned.

Chapter 3 - Vision and Objectives

- **Vision**

The Panel accepts the need for a separate vision from the overarching Integrated Regional Framework (IRF) but feels the vision should be clearer and recommend an amended vision based on the Plan's Executive Summary as follows:

"The Plan's vision for 2026 is for a healthier region for its citizens and of the environment, a more sustainable pattern of development and a dynamic and robust economy, the benefits of which are more widely shared."

- **Objectives**

The Panel recommends improvements to the formatting of the objectives which it feels are unclear due to overlapping lists. No major changes to the actual emphasis / purpose of the objectives are proposed other than to the objectives on housing and economic growth. It does not accept the cautionary approach to growth which seeks to plan positively for a 'reasonable level' of both economic and housing development. In terms of housing, it recommends using the word 'sufficient' rather than 'reasonable' as used in the Plan but equally do not accept that the national objective of providing housing opportunities for 'everyone' is feasible. In terms of economic growth, the Panel recommends using the wording from the IRF, 'to sustain economic growth and competitiveness across the region'.

Chapter 4 - Spatial Strategy

Whilst the Panel supports the 'sharper focus' concept and the emphasis on the hubs, it is concerned that the spatial strategy lacks focus and in particular, does not attempt to indicate preferred locations for major development other than the two Strategic Development Areas (SDAs) in South Hampshire.

- **Strategy Building Blocks**

As 87% of the proposed development is to take place in the nine sub-regions, the Panel feels that it is fair to assume that these will either be areas of growth or regeneration (or in some cases both); however, this is not explicit enough. It is

particularly concerned about how the London Fringe fits this as it appears to be neither. The Panel later recommends that this becomes, in effect, an area of growth.

The Panel supports the urban focus of the strategy but is concerned that this should not override other strategic considerations. Although it feels that new settlements were not properly considered, it accepts that there is unlikely to be any suitable, sustainable locations for this in the region.

Whilst supporting the regional hub concept, the Panel feels that these need to be set more within the context of growth. It also recommends that the Regional Economic Strategy (RES) 'diamonds' and New Growth Points (NGPs) are better related to the hubs as delivery mechanisms. Where NGPs are concerned, the Panel accepts that some of these will have limited potential for continued growth post 2016. Where it is satisfied higher growth is involved, eg Didcot, Maidstone and Basingstoke, it recommends that these should be identified on the Key Diagram.

The Panel feels that, despite the fact that the possibility of selective reviews in Oxford and Surrey has been considered through previous structure plan reviews, the Assembly is wrong to treat this as 'inviolable'. In order to accommodate the higher housing levels proposed, it has recommended selective reviews around Oxford and Guildford, with further possible local reviews around Redhill / Reigate and Woking. It has also recommended development of the DERA site (Chertsey), which is a major developed site within the London Fringe.

- **Key Regional Influences**

The Panel considered a number of other factors that were taken into account by the Assembly and local authorities in preparing the sub-regional strategies:

- The Panel concludes that the areas with greatest economic potential are in what SEEDA terms the Inner South East and that these areas are underplayed in the spatial strategy.
- Although the Panel accepts that the Plan does seek to address intra-regional disparities as far as it can, it does not agree with some participants that restricting growth in the more buoyant parts of the region will encourage growth in the areas where regeneration is a priority.
- The Panel recommends a sharper focus for the network of town centres which distinguishes about 12 Primary Regional Centres that are expected to change significantly over the Plan period.

- Although demographics were a factor in the overall housing provision, the Panel is concerned that natural change within the region has not obviously influenced the spatial distribution of new development.
- The Panel accepts the merit in locating development within the urban areas and regional hubs, which makes best use of existing transport infrastructure.
- The Panel concludes that water utility infrastructure will have the greatest influence on distribution of housing between settlements / districts and not the regional level distribution.
- Although climate change has been taken seriously within the Plan, the Panel feels that it has not had any major influence on the spatial strategy, other than reducing the need to travel by focusing development in the hubs. It also concludes that sufficient evidence was considered re flood risk but that the influence on this was more appropriately considered at the local level.
- The Panel is satisfied that, despite the timing of the Habitats Directive, this has influenced the spatial strategy, particularly around the Thames Basin Heaths and, at a more local level, around South Hampshire and the Sussex Coast. It also acknowledges that this is an iterative process and will continue to be applied through the next stages of the process as changes are made.
- The Panel is content that, with the urban focus of the strategy, there will be sufficient flexibility at the local level to avoid adverse impacts on high quality landscapes.

- **Evaluation of Strategic Options**

The Panel is concerned that the spatial strategy is largely a roll forward of the existing RPG9 strategy. Although it accepts that the Assembly was right not to test strategies that were contrary to national policy, it criticises the Assembly for not testing a strategic option that focused a greater proportion of development to support the more economically buoyant part; for not considering a more flexible approach to the Green Belt; and for dismissing opportunities outside the sub-regions.

- **The Panel's Recommended Spatial Strategy**

- All sub regions are retained as areas of growth or regeneration; the London Fringe becomes an area of growth.
- Regional hubs and other growth points intended to support significant new housing are highlighted; most additional growth recommended by the Panel to be concentrated in the 'Inner South East' to maximise the economic potential of these areas and to reflect the fact that the housing levels proposed in the Plan for the WC/BWV and London Fringe are insufficient to meet natural change.
- Six 'Strategic Development Areas' are recommended; two with South Hampshire (which are already in the draft Plan), two adjacent to Milton Keynes, one in south Oxford and one in south Reading. The threshold used to define SDAs is 4-5,000 dwellings. The broad location of each should be defined on the Key Diagram.
- The Panel does not agree with the developers that sites of 2-3,000 should be specified as these should be tested at the local level. However, some sites within this range may have to be included in the sub-regional strategies where these are considered to be strategically important (i.e. where they cross local authority boundaries and affect district apportionment figures).
- The Panel recommends an early partial review to deal with the locational specificity of strategic employment sites, unless they have already been identified through the sub-regional strategy.

Chapter 5 - Cross Cutting Policies

The Panel concludes that, although there were many candidates put forward by participants for new cross-cutting policies, too many would devalue their significance. It did accept however, the rationale for one new cross-cutting policy on Green Infrastructure. It also recommends additional references in existing policies, or in the case of smart growth and the River Thames, a new policy within the relevant topic section of the Plan, to cover most of the issues raised. Several changes to core policies and sub-regional changes are recommended as a result.

As part of the recommendations to improve the format and 'readability' of the Plan, the Panel recommends that the cross-cutting policies with a spatial context be moved to the new section on the spatial strategy.

- **Climate Change (Policy CC2)**

The Assembly is congratulated by the Panel for giving a strong lead on this within the region and it endorses the policy as appropriate and necessary. It considers that there are two inter-related issues; whether the Plan takes a sufficiently integrated approach to climate change and whether the regional target for reduction in CO₂ emissions is appropriate and justified.

On the first issue, the Panel concludes that although the Plan's influence is limited, particularly on behavioural change, it is important that the Assembly, along with others, continue to provide a lead for planning action. The Panel recommends the expansion of references in a number of policies to make the link to climate change more explicit, which together with a new policy on Green Infrastructure would harden up the efforts in the Plan on mitigation and adaptation.

On the matter of CO₂ targets, the Panel agrees with the Assembly that the reduction of CO₂ emissions is a "vital part of a more sustainable future for the region" and therefore targets provide context and direction for the policy. The Panel does not consider the need for the targets to be more challenging. Any refinements needed in future should be done through the next review of the Plan.

- **Resource Use (Policy CC3)**

The Panel acknowledges the challenging aims of this cross-cutting policy in terms of stabilising the ecological footprint of the region as "wholly appropriate and necessary". However, the targets set out in the policy should be 'aspirational', given the limited role of the RSS and the fact that the increased housing provision will in itself increase the ecological footprint.

The Panel recommends that the concept of ecological footprint reductions be better linked to other policies such as transport, housing and energy.

- **Sustainable Construction (Policy CC4)**

Advice from Government on sustainable construction (Code for Sustainable Homes) was published on the same day this was discussed at the EiP and supported the approach the Assembly is taking in the Plan. The Panel considers that the Plan should "raise expectations about sustainable construction" and encourage new development to seek the highest possible sustainability rating in accordance with the Code as well as the use of sustainability checklists. It also concludes, however, that the Plan should go further in terms of encouraging improvement to the existing building stock in the region.

- **Inter-Regional Issues (Policy CC7)**

Whilst the Panel supports the commitment in the policy to joint research with adjoining regions, it is concerned that the Plan does not adequately take into account the functional inter-connectivity between the regions, particularly between the South East and London. It recommends that Policy CC7 is deleted, as it is only about process, and that inter-regional issues should be dealt with in the proposed new Implementation, Monitoring and Review section of the Plan.

- **Ageing Population (Policy CC11)**

The Panel concludes that, given the skewed picture in terms of the ageing population, with pockets within the region expected to have much greater increases in the 65+ population and the 85+ population within the region set to increase generally, the policy is regionally specific and is cross-cutting.

- **Urban Focus (Policy CC8a)**

Whilst the Panel supports the urban focus of the Plan, which is consistent with national policy, it makes it clear that this should not mean that all new development can or should be accommodated within urban areas. Where the 60% target for development on previously developed land is concerned, the Panel is satisfied with this as a target for monitoring, accepting that in some cases delivery will be lower and in some cases it will be higher. It also acknowledges that this may change over time but that there was insufficient evidence to propose a split target for the Plan (i.e. phased over time).

- **Regional Hubs (Policy CC8b)**

The Panel agrees that the hubs should be the linchpin of the spatial strategy but recommends changes to the policy to make the link between the hubs and housing development clearer.

- **Intra-Regional Disparities (Policies CC9 and RE5)**

The Panel concludes that, subject to some minor amendments, Policy RE5 provides a sound basis for addressing economic development in the region. Although there is some overlap with this policy and CC9, the Panel feels that it is important to retain a cross-cutting policy on reducing intra-regional disparities but recommends re-titling both policies - CC9 to 'Regeneration and Social Inclusion' and RE5 to 'Promoting Competitiveness and Addressing Structural Economic Weakness'.

- **Green Belts (Policy CC10a)**

The Panel agrees that Green Belt Policy should remain a central plank of the spatial strategy; however, it feels that the wording of the policy restricts the ability to undertake a selective review of the Green Belt, even though these have been considered in past Surrey and Oxfordshire Structure Plan Reviews. Given the

recommendation to increase the overall housing provision in the region and, in particular, within the London Fringe and Central Oxfordshire, the Panel concludes that this will require consideration of options outside the urban areas, particularly around the hubs (in Guildford and Oxford and possibly Woking) and that selective reviews will be inevitable. It also concludes that a smaller scale review may also be necessary around the hub of Redhill / Reigate. These will also need to be considered alongside major developed sites in the Green Belt which it considers could contribute to development needs in a sustainable way.

The Panel therefore recommends that the policy should provide for the general protection of the Green Belt but should identify broad locations where selective reviews are likely to be required to accommodate regional development needs. Where Green Belt boundaries are reviewed, these should endure to at least 2031.

- **Strategic Gaps (Policy CC10b)**

The Panel concludes that the policy may serve a useful purpose in principal, by seeking to define and limit the circumstances in which it would be appropriate to designate a strategic gap but that these will need to be reviewed regularly to ensure that sustainable options for accommodating new development are not being missed. It rejected the proposed five mile width to maintain separateness of settlements and opted instead for a two mile gap. It also rejected GOSE's request that the general extent of all strategic gaps be set out in the policy.

- **Environment and Green Infrastructure**

The Panel agrees that GI is a cross-cutting issue and rather than integrating it with a number of other existing policies, recommends a new policy to cover this, drawing from the text proposed by the Assembly which reflects and expands upon the definition of GI in the Implementation Plan.

- **Implementation and Infrastructure (Policy CC5)**

While the Panel agrees with the inclusion of a cross-cutting policy on implementation, it believes the 'conditional approach' advocated in Policy CC5 to be unsound on the basis of complexities of interpretation and restriction on delivery. As such, the Panel calls for the deletion of section iii of the policy and any reference to a condition of development being restricted until adequate infrastructure is provided. In its place, the Panel recommends that the policy reinforces the importance of 'timely delivered' infrastructure.

The Panel is also concerned that Policy CC5 is focused on 'hard infrastructure' delivery, and does not recognise the role of demand management in improving infrastructure capacity. As such CC5 is to include a reference to demand

management, in particular referring to the 'twin track approach' (water) and 'manage and invest' (transport).

Policy CC5 also needs to give coverage to 'joint-pooling' of S106 contributions - with the supporting text explicitly referring to a tariff approach. While the need for mainstream public funding is recognised, the reference to the proposed concordat with the government should be deleted as the EiP established that this is unlikely to happen. This should be replaced with a reference to the need to develop joint mechanisms to 'forward fund' infrastructure.

The remainder of proposals are outlined in Chapter 27.

- **Use of Public Land (Policy CC6)**

The Panel welcomes the work that has been initiated by the Assembly on this and recommends that the strategic objectives and policies of the RSS should be taken into account in the use and disposal strategies for public land.

Chapter 6 - Economy

The economy is important - the Plan recognises this as 'context', but does not translate it fully into the spatial strategy and provisions. It generally takes a passive approach (except for some sub-regions).

The Panel acknowledges that there is a spatial dimension to the region's competitiveness. Not only are London and the 'Golden Arc' (includes Western Corridor / Blackwater Valley-Oxford-Milton Keynes / Aylesbury and extends to Cambridge) the real powerhouses of the English economy but the polycentric nature of the region is also one of its strengths.

In terms of consistency between the Regional Economic Strategy (RES) and RSS, the Panel concludes that whilst there was an attempt to bring these two closer together, there remains some significant differences. It recommends several changes to address this, which include increasing the housing provision to support the Plan's own economic growth aspirations of 3% GVA; recognising the role of the 'Diamonds for Investment and Growth' within the spatial strategy; and directing more development to support the economy of the buoyant parts of the region. It also acknowledges that alignment will be even closer once an early partial review of the Plan has been undertaken to provide a strategic context on types of employment

needed for different parts of the region, and strategic employment sites; the joint Implementation Plan for both the RSS and RES is prepared; and the future reviews of both strategies use a common evidence base.

Although the Plan's target of 3% GVA per annum is pitched at a lower level than the RES' aspirations and is based on a different indicator (the RES uses GVA per capita), the Panel concludes that these are not inconsistent and should both be used for monitoring purposes. However, it feels that the Plan's growth target is internally inconsistent and address this later in the report by increasing the housing numbers. It agrees with the Assembly that a GVA estimate for the longer term (post 2016) will need to wait for a further review of the Plan.

The Panel is concerned that the Plan provides a post-hoc justification of how the Assembly considered employment projections. SEEDA's advice to use Experian published forecasts as the best starting point for the RSS is accepted (as they are not 'constrained' by the Plan's housing growth). The Panel feels that the Assembly retrospectively attempted to justify provision levels which it regards as a 'high risk strategy'. It recommends that the broad approach should be to plan for similar numbers of new homes as jobs in parts of the region with interlocking labour market characteristics. The implication of this is an upward revision of housing levels in most sub-regions. The Panel does however recognise balancing supply and demand of labour is not an exact science.

For monitoring purpose, the Panel is content to use job estimates agreed between SEEDA and the Assembly at the EiP for all sub-regions, except the London Fringe and Central Oxfordshire. However, it agrees with the Assembly that job estimates are not to be used in policy. Gaps for 'rest of' areas are resolved by use of SEEDA's Experian data.

The concept of 'smart growth' is supported by the Panel but it feels that there is too much reliance on this as a way of reducing the need for housing.

The Panel therefore recommends that a new policy be included in the Economy part of the Plan, which will reflect the policy content of WCBV5 (which would consequently be deleted). Each sub-regional strategy should then include a brief comment on the aspects of smart growth most applicable to that area, to reflect the differences that may be needed in economically buoyant areas compared to the areas where economic regeneration is a priority.

Chapter 7 - Housing Provision Levels

- **Factors Influencing the Scale of Housing**

On the latest household projections, the Panel makes it clear that it does not subscribe to a 'predict and provide' approach. Nevertheless, it is concerned that the housing provision does not take sufficient account of demographic needs. While it accepts inevitable uncertainty over future migration levels, it does not consider that this situation is tenable as; it would be unrealistic for the South East not to accommodate continued out-migration flows from London; national projections (*for international migration*) already include constrained assumptions compared to recently experienced levels; household size for international in-migrants tend towards the average over time. It concludes therefore that, given the volatility of migration patterns, the most robust strategy would be to be guided by long-term (10 year) migration trends i.e. 32,000 dwellings per annum (dpa) which is 640,160 dwellings over the Plan period.

On affordable housing, the Panel commends the work undertaken by CCHPR as providing a realistic estimate of the need for social housing, at about 25% of the regional total. On the affordable housing backlog, the Panel supports the Assembly's attempt to identify the scale and geographical distribution. However, it does not see any merit in trying to identify a more precise estimate of the backlog and fail to see how the backlog could be cleared within the first 10 years of the Plan, unless more than 25% of social housing is achieved, or there are other measures to improve access to housing. Despite this, their recommendation for an increased regional housing level is in part designed to give greater flexibility to assist in meeting the backlog.

The Panel is not convinced by the arguments that increasing housing supply will impact on affordability, given the complexities of the issues involved - "we cannot say whether there would be any discernible benefit at the regional level on affordability from our recommended increase in housing levels. This is not the primary driver behind our recommendations".

As already pointed out in the previous chapters, the Panel is concerned that there is a severe mismatch between forecast labour demand and labour supply within WCBV and London Fringe sub-regions. The magnitude of this apparent misalignment increases on the demand-based forecasts, and encompasses Central Oxfordshire and the Gatwick sub-regions. It concludes that the Assembly has been too timid in recognising the importance of the economically buoyant areas to the well-being of the region and country as a whole, and has been too influenced by urban capacity and perceived local constraints.

On housing land availability, the Panel is content that the assumptions used for the urban potential work co-coordinated by the Assembly were not overly optimistic and are therefore a reasonable basis for the RSS. However, it shares the concerns

expressed throughout the EiP by the Assembly and local authorities about PPS3's approach to windfalls, recognising that local authorities have managed to achieve a high rate of recycling and that it is not always possible to identify where such opportunities may emerge in advance. It therefore anticipates that quite a few local authorities in the region will be able to provide "robust evidence of genuine local circumstances that prevents strategic sites being identified", and will be able to demonstrate expected future trends in windfall delivery rates.

Throughout the report, the Panel fully acknowledges the challenges faced in the region in terms of delivering infrastructure but it did not find any persuasive evidence to indicate that only a fixed figure of 28,900 dpa (578,000 over the Plan period) could be accommodated.

The Panel was informed by the Roger Tym and Partners appraisal of the sustainability implications of higher levels of housing growth (commissioned by GOSE) in coming to their conclusions about overall levels. It accepts that the sustainability of increased levels of growth will depend in large part on the success of demand management measures for modal shift in transport and of measures to reduce consumption of natural resources in general.

- **Panel Recommended Housing Provision Levels (Policy H1)**

- a) A regional housing level of 32,000 dwellings per annum (640,160 over the Plan period).
- b) The largest increases in Central Oxfordshire, WCBV and London Fringe where the Panel considers insufficient weight has been given to economic factors, and in the case of the latter two sub-regions also to demographic factors. This results in 47% on new housing being accommodated within what the RES describes as the Inner South East (WCBWV, Central Oxfordshire, MKAV, London Fringe and Gatwick). In respect of the areas outside the sub-regions, the highest increases seek to optimise capacity within the regional hubs and in those towns with good public transport connections some of which have played a growth role in previous regional and structure plan strategies, and make provision for the reuse of public land.
- c) The Panel acknowledges the concerns of 'split districts' but agrees with the Assembly that for the 'sharper focus' concept to work, housing allocations should reflect the sub-regional components identified. The three exceptions to this where greater flexibility is recommended are the Sussex Coast and the Gatwick sub-region because some of the same local

authorities are involved, and to Reigate and Banstead DC to reflect the fact that Redhill/Reigate Hub is part of both London Fringe and Gatwick sub-regions.

- **Qualifications on Housing Levels**

The Panel makes it clear that because the RSS should provide a firm basis for planning, the housing provision figures are intended to be targets for LDFs. It concludes that although expressed as annual averages, they are just that, and it is the overall level that should guide assessments of available land in accordance with PPS3. In the subsequent development control process these RSS housing levels should not be treated as ceilings, nor should there be any attempt to ration planning permissions to avoid outperforming the RSS. Hence it sees no impediment to allowing the accommodation of higher numbers than indicated in Policy H1 at the main brownfield opportunity areas identified in the Plan if this were later found to be feasible, eg at Shoreham Harbour or Whitehill-Bordon.

Chapter 8 - Affordable Housing and Other Housing Policies

- **Affordability and Affordable Housing (Policy H4)**

The Panel strongly supports the Plan's emphasis on increasing affordable housing provision significantly across the region and acknowledges that the only way to tackle genuine housing need is to substantially increase the level of investment in affordable housing. To make it clear that the Plan's focus is 'affordable housing' and not general market affordability, the Panel recommends that the PPS3 definition of affordable housing be included in the text to replace the wording in the Plan.

Participants were supportive of the strategic steer given on affordable housing in the Plan and there was general consensus on the proportion required but the main debate was around the relationship between market and affordable housing. The Panel concludes that affordable housing cannot be decoupled from overall housing levels. Although this weighs in favour of increasing the overall housing levels in the Plan, it has not used this as a primary justification, as it agree with the Assembly that it is not the case of building a way out of a problem and that a more targeted approach to the provision of affordable housing is needed.

On delivery, the Panel was reassured that the Regional Housing Board's approach to affordable housing investment was very closely aligned with the RSS, given that the Plan is the statutory document and should provide the strategic planning framework

for investment. It therefore concludes that on delivery agencies there is nothing that the RSS can usefully add as the Regional Housing Board has prime responsibility for setting priorities for publicly funded social housing in the region.

The Panel also feels that delivery at the local level should take into account the Strategic Housing Market Assessments (SHMA) and are clear that these need to be related to broad housing market areas which cut across local authority boundaries. It therefore recommends that the Plan should include a much stronger reference to the necessity for jointly prepared SHMAs where administrative boundaries bear little relation to housing markets. This also needs to be reflected in the Implementation Plan.

The Panel supports an amendment to Policy H4 which allows for the inclusion of lower site size thresholds for negotiating affordable housing. Although PPS3 now provides a comprehensive policy framework for affordable housing provision in rural areas and there is nothing that is regionally distinctive for the RSS to add, the Panel accepts that, given its psychological importance, a reference to affordable housing needs in rural areas should be retained in Policy H4.

- **Regional and Sub-Regional Targets**

The Panel is satisfied that Policy H4's requirement that LDDs should "have regard to" the regional target is justified and appropriate. On the targets for affordable housing (35%) and the split between the social rented housing and intermediate housing (25%/10%) it concludes that the targets have a sound basis for inclusion in Policy H4. The proposed targets are a reasoned, balanced response to need and funding considerations, and the particular circumstances at local level will be best addressed through the development of policies in LDDs which are informed by SHMAs.

Despite the support for the target, the Panel acknowledges the extent to which existing commitments will have already set the proportion of affordable housing, which may well be below the Policy H4 target, and that there will be competition for S106 funding for other infrastructure needs. It therefore recommends 'monitoring and review' to address the appropriateness, including the achievability, of the targets.

- **Type and Size of New Housing (Policy H6)**

The Panel endorses the need for a policy on type and size because it has symbolic importance to offset the inevitable emphasis on the quantitative aspects of housing provision levels; it is consistent with PPS3; there are regionally specific challenges; the mix of housing could be unduly influenced by the high cost of land and the

demand for institutional investment in this region. More detailed identification of needs at the local level should be done through LDFs, informed by the results of SHMAs.' The Panel also suggests that further monitoring indicators should be used in respect of affordable housing, so that the size of units constructed is recorded as well as just number of units.

- **Housing Densities (Policy H5)**

The Panel supports the need to have a regional target on density as a useful monitoring tool, provided it has adequate explanation of its purpose, and supports the proposed target of 40 dwellings per hectare in Policy H5, which presents the right degree of challenge at least in the short-term. However, it also advises that it is important that any RSS policy does not put too much weight on the pursuit of a particular density level at the expense of other planning objectives. The overall objective must be to create sustainable mixed communities, which is reflected in the Panel's recommended changes to Policy CC1.

Chapter 9 - Transport

- **Context for the Regional Transport Strategy (RTS)**

The Panel agrees that the Plan contains few significant alterations to the regional transport policies adopted in the RPG9 partial review (2004) and therefore endorses the overall Manage and Invest strategy in Policy T1, the approach to rural transport in Policy T2 and the emphasis on the regional spokes in Policy T3.

- **Mobility Management (Policies T4 and T5)**

However, the Panel, acknowledging that there have been several announcements since 2004 which are relevant to demand management in transport sector, is surprised that more changes to the transport strategy are not suggested. In terms of the debate about whether a reduction in the use of car can be achieved without addressing the 'infrastructure deficit', it concludes that while there are undoubtedly some transport corridors where highway improvements are required, it is inevitable that part of the answer to worsening congestion, to growth and future movement needs, and to the challenge of climate change must be that dependency on travel by cars has to be reduced, but believe it to be unrealistic to achieve an absolute reduction during the life of the Plan.

The Panel supports the Assembly's position that demand management involves both improvements to infrastructure and behavioural change and endorses the starting point for the Manage and Invest approach, which recognises that the transport system is a resource with a finite capacity at any one point in time. It also agrees that the focus on development in urban areas and, in particular within the regional hubs, should help to promote demand management.

However, the Panel concludes that Policy T5 is too weak as it does not give appropriate guidance to the local planning authorities in terms of what actions LDDs and LTPs should take and therefore recommends a stronger introduction to the policy. It is also concerned that the measures in Policy T5 do not appear to be carried through into the individual sub-regional strategies and recommend that the text to Policy T5 should say that the sub-regional strategies will indicate the likely mix of demand management measures that will be deployed in each area.

- **Road User Charging (Policies T6, T7 and T8)**

The Panel is concerned that insufficient leadership on approaches to road user charging (RUC) is given in the Plan, particularly given the emphasis on demand management and the inevitable difficulties of implementing RUC at the local level.

However, it acknowledges the Assembly's view that this needs to be given leadership at national government level and that local authorities cannot realistically be expected to take action to implement a charging regime without a national policy framework. It also accepts the Assembly's view that RUC is a case of everybody leaving it to everyone else.

The Panel agrees with the Assembly that charging initiatives can only be part of a package of mobility management measures and therefore endorses revised Policy T7 (Parking) and T8 (Travel Plans and Advice). It feels that a broader approach to Policy T6 (Charging) is needed, however, to provide a stronger framework for considering RUC.

- **Freight and Inter-Modal Freight Exchanges (Policies T11, T12, T13)**

The Panel acknowledges that the Assembly is undertaking more work on freight but equally share the Assembly's frustration at the lack of a regional freight strategy. Whilst it recognises that the evidence base for freight has been significantly improved and this is welcomed by Panel, it concludes that the Plan does not contain a proper freight strategy and, in particular, fails to give adequate guidance in relation to the new freight inter-changes. In their view the over-riding need to move freight from road to rail is not given sufficient prominence in the Plan and this need should be reflected in the region's investment priorities. It therefore strongly supports the Assembly's efforts to encourage Government to fund appropriate schemes.

Whilst the Panel agrees that Policy T11 (Freight and Site Safeguarding) is important in highlighting the need to safeguard land with potential for future freight activities and especially waterfront locations, it does not support the Assembly's proposed deletion of Policy T13 (Intermodal Interchanges) as this appears to be contrary to what is required by PPS11. It accepts the case presented in the former Strategic Rail Authority's Rail Freight Interchange Policy, which concluded that three to four new strategic rail freight interchanges were required in the wider South East (eg includes London and East of England) and endorse the need for a study (preferably joint) to identify suitable locations. The Panel also suggests potential candidates for this, concluding that there seems to be both need and potential towards the north-western end of the Channel Tunnel-London corridor since the CTRL can take W9 standard containers and it intersects the M25 and recommends that this broad location be identified in the text. It therefore concludes that Policy T13 should be retained, with a criteria-based approach to fill the vacuum until specific locations can be evaluated.

- **Ports (Policy T10)**

The critical role of ports is recognised in the Plan through its emphasis on the role of 'gateways'. The Panel supports the revision proposed by the Assembly to Policy T10, as this clarifies the role of the different types of individual port, and endorses the role of Port Masterplans. It agrees with the Assembly that, whilst a clearer national planning framework for the ports sector would help infrastructure providers to programme investment, port development is private sector led and a light touch regional steer is therefore sufficient.

With regards to congestion on roads approaching ports, the Panel agrees with the Assembly that prioritisation of schemes has taken account of routes to the ports and that Policy T10 (as proposed to be amended) is a reasonable reflection of the role of the RSS in relation to ports.

- **Port of Southampton**

Although the Panel agrees that the port is very valuable to the region's economy and appreciates the uncertainty around the impact of intensification on the existing footprint of the port, it sees no over-riding reason to change the revised Policy T10 other than proposing that its global function justifies Southampton being the first named 'Gateway' port in Policy T10.

- **Port of Dover**

The Panel recognises the role Dover Port plays in terms of the proportion of freight it handles compared to other ports in the region, and its importance in terms of employment and contribution to the local economy and therefore supports its gateway status in the proposed revision to Policy T10. It also supports Dover DC's view that the importance of the strategic corridor between Dover and Thanet merits recognition as a transport "spoke" on Map T2.

- **Airports (Policy T9)**

Whilst acknowledging that the Assembly is in a difficult position as its stance on airport expansion seems to be corroborated by its own research showing that environmental and social impacts will be greater than those set out in the Aviation White Paper, the Panel recommends that Policy T9 is amended to be consistent with the Aviation White Paper, to ensure that development does not take place on land

needed for a new wide spaced runway after 2019. This also reflects the emerging Crawley LDF which proposes safeguarding the land anyway.

- **Schemes of Regional Importance**

Although the individual projects are not prioritised in the schedules of the Implementation Plan, the Panel accepts that by implication, the 29 transport schemes classified in Annex 2 as 'national, inter-regional and regionally significant infrastructure' are the most significant for the delivery of the strategy. In addition to these, the RTS objectives in paragraph 1.11 of Section D4 give some indication of broad priorities and the Panel recognises that the priorities being set via the Regional Funding Allocation (RFA) process will provide a steer on some types of scheme. Taking this context into account, it concludes that the following broad priorities incorporate the entire individual transport infrastructure schemes included in Annex 2 of the Implementation Plan:

- London-Channel ports corridor (road/rail improvements)
- Midlands-south Hampshire corridor (rail freight upgrade)
- East-West Rail
- Thameslink
- Crossrail
- Other London orbital schemes
- Other inter-regional link
- Airtrack
- Reading Station improvement
- Route Utilisation Strategy - Brighton Mainline, Great Western Mainline
- Other access improvements

Although the funding of several of these projects is not yet confirmed, the Panel views these as critical to the spatial strategy and therefore, priorities in RSS.

Chapter 10 - Natural Resource Management

- **Water Management and Flood Risk (Policies NRM1-3)**

On water resources, the Panel welcomes the emphasis in the Plan on the need to manage demand as well as build new capacity, however, the components of 'managing demand' (in particular improved management of existing infrastructure and promoting behavioural change) should be expressed more clearly.

The Panel is impressed by the extent of partnership working to address water issues but recognises that regional bodies have little impact on water efficiency and their

role is limited to influencing (eg behavioural change which depends on individual choices).

On the evidence provided through the Environment Agency's (EA's) modelling work, the Panel concludes that with the mix of demand management and delivery of new infrastructure assumed, additional demand from up to 40,000 new homes could be accommodated. However, it also endorses the EA's view that the required efficiency savings within the region can only be secured through a rigorous and co-ordinated framework at the national level eg tighter Building Regulations, higher efficiency standards for appliances, more extensive (and probably compulsory) water metering and tougher leakage controls.

Policy NRM2 should identify reservoir schemes (with a geographic reference) to provide greater certainty over their need and provide a firmer steer to LDDs to facilitate the delivery.

On water quality, the Panel recommends that a new Policy NRM1A on River Water Quality Management should be created to separate water quality from water resource issues. The policy should clarify the distinction between physical waste water treatment capacity and the capacity of the receiving water, as well as indicate the additional work required to address potential Habitats and Water Framework Directive implications. As a new issue reducing diffuse agricultural pollution should be added.

The Panel concludes that the Plan achieves broad compliance with PPS25 in terms of flood risk on the basis of the preparatory work undertaken on flood risk assessment and that there is insufficient reason at this stage to question the district level allocations on the basis of flood risk. However, Policy NRM3 should reflect more fully the advice and priorities in PPS25.

- **Protection and Enhancement of Biodiversity (Policy NRM4)**

The Panel concludes that the Appropriate Assessment (AA) undertaken by the Assembly is fit for purpose as the changes to policies recommended by the Assembly following the AA address most of the concerns raised by participants and is now a sound response to the AA.

However, the Panel recognises that more detailed implications will have to be tested at the LDD/application stage and that this could eventually lead to a partial review of the RSS. The Panel cautions, though, that some degree of pragmatism is required and that AA is a new and rapidly developing decision making tool and questions and uncertainties will arise in the early stages of application but this is not a reason to halt the Plan making process.

In terms of the hierarchy of sites, the Panel recommends a change to Policy NRM4 to make it clear that a higher level of protection needs to be given to internationally important sites than nationally important sites to comply with PPS9.

On Regional Biodiversity Targets, the Panel concludes that additional resources and co-ordinated actions will be required to achieve the Plan's objectives and recommends amending the Implementation Plan to reflect Natural England's report on delivery of biodiversity targets.

- **Thames Basin Heaths SPA (Policies WCBV3, WCBV9, LF11)**

The Panel agrees with the Assembly and local authorities that the impact of the Plan's proposals on the integrity of the Special Protection Area (SPA) is of great significance and that a specific policy is required. However it recommends a single policy in Natural Resource Management section of the Plan rather than the sub-regional sections for Western Corridor and Blackwater Valley (WCBV) and London Fringe (LF), with guidance on phasing of housing in the sub-regional housing distribution policies. It also agrees with the Assembly that, on the basis of the Assessor Peter Burley's conclusions on the strategic implications of the SPA on the Plan, there is no longer a need to refer to a review of scale and distribution of housing from first principles, in the WCBV and LF sub-regions.

Although the Panel recommends a significant increase in the number of dwellings proposed within the 5km zone of the SPA (approximately 6,000 more than proposed in the Plan, mainly in the LF sub-region), it argues that this will mainly be accommodated in a few large schemes where Suitable Alternative Natural Green Spaces (SANGS) can be provided on site.

In terms of implementation mechanisms, the Panel:

- Recommends that an Interim Strategic Delivery Plan (ISDP) should be developed as a matter of urgency, although it does not consider it appropriate to comment on the details of this.
- Agrees that for the longer term, a strategic partnership to co-ordinate policy for the protection and management of the SPA is necessary and welcomes the Assembly's offer to take a lead role in establishing this.
- Strongly supports use of the Regional Infrastructure Fund to forward fund delivery of accessible green space.

- Concludes that the issue of allowing 9 dwellings or less to proceed without contributing towards mitigation is a short term logistical issue rather than a matter for RSS.
- Recommends that a Joint Supplementary Planning Document (which would be quicker than a joint DPD) should be prepared by the proposed strategic partnership.
- Recommends that, non-residential development within 1km of sensitive parts of the SPA should be assessed on an individual basis.

- **Coastal Management (Policy NRM6)**

Area specific comments on coastal management are contained in the sub-regional chapters but in terms of the Plan's general approach, the Panel concludes that it should recognise the very long-term horizon of Shoreline Management Plans, the areas currently covered by them and expectations for these areas to be reflected in LDFs. It also recommends that Policy NRM6 should be amended to make explicit the need to take into account economic and social objectives in shoreline planning and management.

Chapter 11 - Waste and Minerals

- **Apportionment of London Waste (Policy W3)**

The Panel considered both the Plan's proposed apportionment and the additional modelling of alternative distributions undertaken by consultants commissioned on behalf of SERTAB prior to the EiP. Although most waste planning authorities accept the principle of apportionment, there was no consensus on the best approach. The Panel considered two options; a single apportionment based on one of the above options or to defer any apportionment until a later date (recognising that contracts etc have already been set), which would require an interim position. It concludes that a single apportionment is appropriate and in terms of distribution, it recommends Option 2f that closely reflects the Assembly's original apportionment in Policy W3 but excludes Green Belt from the environmental constraints, with the percentage splits based on 2006. The panel does not commit to any figures on the overall scale of waste movements but recommend possible further work and agreement between the Assembly, the East of England and London and the possibility of a joint EiP (between the three regions) in the future.

The panel recognises that there will be an inevitable transition period based on existing contracts expiring but do not indicate when this will occur.

- **Hazardous Waste (Policy W15)**

The panel endorses the Assembly's general approach in setting out priority needs for hazardous waste treatment facilities in Policy W15. However, it recommends that the policy should broadly refer to serving the needs of the south and south eastern parts of the region, with supporting text rather providing the spatial detail.

- **Apportionment of Recycled and Secondary Aggregates (Policy M2)**

The panel supports the proposed apportionment in Policy M2 and consider the background work to be 'well founded and transparent'. It recommends that the background text to Policy M2 include clearer cross-referencing to Policy W6 (Recycling and Composting targets) and Policy W15 (Hazardous Waste).

Chapter 12 - Countryside and Landscape Management

- **Strategy for Rural Areas**

The Panel is satisfied that sufficient background research was carried out on rural issues and although it feels that rural areas lack spatial profile, it feels that this is not the same as accepting that there is a policy deficit within the Plan. It concludes that the Assembly's approach to rural areas, with their recommended changes, is sound.

Further recommendations on rural areas are made with regards to rural affordable housing in the Chapter 8 and in terms of overall housing numbers in rural areas (rest of counties) and any changes that are recommended are set out in Chapter 26th.

- **Countryside and Landscape Issues**

The Panel concludes that the Plan should reflect more clearly what is 'regionally distinctive' in terms of landscape features and recommend that greater emphasis is given to the positive role of countryside in the supporting text.

- **Nationally Designated Areas**

The Panel is broadly supportive of the approach to New Forest National Park taken in the Plan, with some amendments to recognise the specific character of the New Forest, to provide a positive message on suitably located and designed small scale proposals, and to make its setting a material planning consideration. It recommends the deletion of policy C1b in its current form, but accepts that there is still a need for an interim policy which provides interim protection for land within the proposed South Downs National Park, pending its final approval.

- **AONB**

The Panel agrees with the Assembly that policies on AONB and National Parks should be separate as they are statutorily different but agrees that both designations should receive the same level of protection. It therefore recommends that policy C2 needs amending to reflect the 'high priority' protection given under policy C1a. As with National Parks, the Panel recommends that the supporting text should give some flavour as to why AONBs are regionally distinctive including the scale of population and pressure from London. The panel also recommends that the text explain the links to strategies other than LDDs including AONB management plans. With regard to AONB/National Park coastlines, it feels that the text should make it clear that the setting of nationally protected landscapes is actually protected to the mean low water mark.

- **Landscape and Countryside Management (Policy C3)**

The Panel feels that Policy C3 is largely a repeat of national policy (PPS7) but accept that there is a need for a separate policy to cover protection and enhancement of local distinctiveness, positive land management around the edges of London and in areas most subject to growth and change, and a criteria-based approach to development control in LDDs. It recommends that Policy C3 is restructured accordingly. The supporting text should also be amended to expand on the role of Landscape Character Assessments and include a map if possible.

- **Agriculture**

The Panel recommends that the Plan is updated to acknowledge the importance of environmental stewardship schemes to land management in the region. It also recommends that there should be a reference to the Rural Development Programme for England (RDPE) as an implementation mechanism for improving the environment and countryside. The report states that the Plan should recognise the contribution agriculture can make to tackling climate change. More specifically, it suggests that the role of bio-fuels etc should be cross referenced in D7 to the Natural Resources chapter.

- **Green Arc Initiatives**

The Panel feels that 'green arc' initiatives are worthy of inclusion in a policy or supporting text given their important and increasing role in improving land-use management. It therefore recommends that the supporting text to Policy C3 is

amended to include a reference to the North West and South West Green Arc Initiatives.

- **Urban-Rural Fringe (Policy BE4)**

The Panel concludes that positive management of the urban-rural fringe is a justified topic for inclusion in the Plan but it sees no reason for any comprehensive attempt to define fringe areas by mapping, not even as zones, and feel that Policy BE4 has lost its way on detail. It recommends that the policy is amended to separate aspects to do with normal plan making functions from broader management initiatives and change the emphasis away from identifying urban extension areas to prioritising areas already proposed for such extensions for proactive fringe management. It also recommends that Policy BE4 should become part of the countryside policies and be renamed 'Managing the rural-urban fringe'.

- **Access to the Countryside (Policy C4)**

The Panel concludes that Policy C4 feels 'bolted on' and whilst it recognises the concerns that it may be too narrowly restricted to the Rights of Way network, it feels that this is not the case if the Plan is read as a whole. The Panel accepts the Assembly's suggested change to Policy C4 to reflect the result of the AA and recommends that some cross reference is made to other relevant policies.

- **Countryside Quality Indicator**

The Panel is not persuaded of the need for a separate indicator for countryside quality. It recommends the investigation of the use of the countryside quality indicator possibly as one of the basket of measures in the future.

- **River Thames**

The Panel concludes that the Plan does not give sufficient recognition to the non-tidal corridor of the River Thames and rejects the Assembly's suggestion that a reference is added to the accompanying text of Policy CC12 (Character of the Environment and Quality of Life). It recommends a new policy within Countryside and Landscape Management section of the Plan, the main aspects of which are:

- Encouraging riparian local authorities to adopt a coordinated policy framework for the river through their LDFs.
- Encouraging joint working between local authorities and other organisations to protect and enhance the natural environment and conservation resources of the river corridor.

- Where the river passes through urban areas, encouraging a coordinated approach across the river bank to maintain and improve public access and open space, protect and improve views of and from the river, and encourage high design quality.
- Safeguarding land for river-related businesses that support sport and leisure use of the river, and encouraging sustainable use of the river.

Finally the panel recommends that the background text to this policy should include the objectives and principles from RPG3b/9a, a cross reference to other relevant policies, the fact that this policy replaces guidance in RPG3b/9a and that the text should include examples of suitable working methods.

Chapter 13 - Small Towns and Suburbs

The Panel supports the thrust of policies BE2, BE3, BE5 and BE6 but propose a number of minor amendments.

- **Suburbs**

The Panel agrees that suburban development is a regionally significant topic for coverage in the Plan, as a key area of change for the future where there is a recognised national policy deficit. It recommends that Policy BE2 (Urban and Suburban Intensification) should require the identification of suitable locations for intensification in order to ensure that it is targeted on appropriate areas, and to meet some of the concerns of local authorities about resource implications. It also suggests that the background text to Policies BE2 and BE3 should be made clearer with good practice examples included.

- **Role of Small 'Market' Towns**

The Panel concludes that the Plan should identify those towns in the 'rest of county' areas that are expected to make a wider contribution to the spatial strategy, such as Winchester, Uckfield, and Banbury, and that Policy BE5 (iii) should refer to 'appropriate' rather than 'small scale' housing development.

Rather than defined by size (3-10,000 population) the Panel recommends that 'small market towns' should be defined by both the function and size of the town, but will generally be up to about 20,000 population.

- **Village Management (Policy BE6)**

The Panel endorses the requirement of policy BE6 to plan positively for villages, and suggests that the policy should set out criteria to assist local authorities in identifying those villages where additional development would be appropriate.

Chapter 14 - Town Centres

The Panel recognises that there is strong support for the Plan's vision of 'a vibrant, accessible network of town centres', but are concerned about the focus and clarity of the policies. It feels that the employment role of town centres designated as Regional Hubs or as Diamonds needs to be more actively promoted and the inter-relationships between centres in the region and beyond, particularly London need to be reflected.

- **Primary and Secondary Regional Centres (Policy TC2)**

The Panel is satisfied that the description of the list of town centres (Primary Regional Centres and Secondary Regional Centres) as a dynamic network of town centres accords with government guidance (PPS6). It accepts that the twin hubs of Redhill/Reigate and Tonbridge/Tunbridge Wells should be retained as PRCs, even though the individual towns would not necessarily stand in their own right as a PRC.

However, the Panel has some concerns about some tensions within the policy and recommends that the policy should be refined to highlight those hubs that will be the focus for significant growth, or where there are particular regeneration needs or a specific growth area focus. The centres suggested (to be notated by an asterix and termed Centres for Significant Change) are Ashford (Kent), Aylesbury, Crawley, Chatham, Guildford, Milton Keynes, Oxford, Portsmouth, Reading, Redhill-Reigate, Southampton and Woking.

Other recommendations regarding the hierarchy are: include Bognor Regis as a SRC; reject the proposal for a joint SRC covering both Haywards Heath and Burgess Hill; delete Farnham from the list of SRCs; designate Westwood Cross as a SRC.

- **Bluewater / Ebbsfleet (Policies TC2 and KT8)**

Although the Panel acknowledges the Assembly's desire to be forward thinking by providing a planning framework to link Bluewater and Ebbsfleet closer together, it concludes that there is no evidence to suggest that Ebbsfleet would become a PRC or even SRC during the life of the Plan and should not be included in the list of town centres in the Plan. Where Bluewater is concerned, the Panel recommends that the Plan acknowledges its importance as a 'regional destination for specialist

comparison goods shopping' but should not identify it as a town centre. Bluewater/Ebbsfleet should be deleted as a PRC from Policy TC2.

Chapter 15 - Social, Cultural and Health

The Panel congratulates the Assembly for the way it has addressed social, cultural and health issues recognising that it has pushed the boundaries of traditional land-use planning and embraced the new style spatial planning concept. However, it also acknowledges the difficulty of incorporating social, cultural and health agendas into the RSS, which has resulted, in some places, with the policies not being sufficiently clear and spatial. There is support for developing the Implementation Plan further to take on more of the agenda but the Panel feels the core strategy needs to be strengthened.

It recommends:

- deletion of Policy S1 on social inclusion as it adds little to national policy and is a variation of Policy CC9.
- an addition to text supporting Policies S3 and S4 to encourage joint working on health problems that have multiple causes and require action in many policy areas. This should also recognise the need to help businesses tackle workplace health problems.
- amendments to the supporting text of Policies S5 and S6 to recognise; the learning needs of older people, people with mental health problems, ex-offenders and economically inactive; the need to recognise ancillary services for higher education institutions; and the need to site universities in mixed use developments.
- strengthening of the supporting text of Policy S7 but rejection of a cross-cutting policy on culture.

The Panel is concerned that the Plan contains only fleeting mention of community safety and recommends an amendment to Policy CC12 (Character of Environment and Quality of Life) to refer 'designing out crime'; an amendment to Policy TC4 (Creating and Supporting Town Centres) to include more on creating safe and secure environments; and a reference to prison provision in the supporting text of Policy S8 (Community Infrastructure).

The Panel acknowledges the difficulty of engaging hard-to-reach groups and the Assembly's efforts to do so. However, it recommends that Policy CC9 (Intra-Regional Disparities) should be adapted to recognise the specific needs of BME and hard-to-reach groups but reject an additional specific policy on the needs of in-migrants as this would undermine existing policies.

Chapter 16 - South Hampshire

• Strategy

The Panel supports the overall strategy and concludes that Policy SH1 provides sound, clear guidance for forward planning and investment in the sub-region, recognising that it is a 'carry-forward' of the Proposed Area of Economic Regeneration (PAER) concept in RPG9 but in a wider geographical context.

It strongly supports Partnership for Urban South Hampshire (PUSH) as a delivery vehicle for the sub-regional strategy and feels that progress made is a testament to the commitment of the local councils to work jointly to achieve their shared vision for the future.

Although there were significant concerns expressed at the EiP by some participants about the impact the economic growth aspirations of the strategy would have on the area's significant environmental assets, the Panel concludes that the Plan should be capable of addressing these. It proposes, however, that it should be made clearer that an integrated approach to growth and the environment has been adopted.

The Panel found no evidence to recommend that the locations for the main urban extensions should be specified in Policy SH1.

• Economy

Although the Panel has some reservations about the ambitious GVA target (3.5%) proposed, it supports it recognising the required step-change in the economic performance of the sub-region. It rejected Hampshire CC's suggested lower target which it feel reflects the desire to hold back new greenfield development rather than a headline target.

On some specific issues, the Panel recommends:

- A reference to actions needed to bring forward the Strategic Employment Area at Eastleigh should be added to Policy SH6.

- The protection of waterfront land that may be required for port use should be added to the supporting text of Policy SH6. However, there is no need for an additional policy on Dibden Bay.

- **Housing**

The Panel is satisfied that the Sustainability Appraisal (SA) findings have informed the selection of the housing level and that the SA's key concerns are capable of being addressed in the implementation of the Plan. It considers it unlikely that there would be significant adverse effects on the integrity of Natura 2000 sites if the recommended policy changes in the light of the Appropriate Assessment are implemented.

The precautionary principle leads the Panel to advise against higher housing numbers at this stage. The work by Roger Tym and Partners has limited applicability at a more detailed level, and the Panel is not confident that it provides a reliable basis for any increase in the overall provision figure.

The Panel considers the concept of reserve land as not appropriate at the regional scale.

- **Strategic Development Area (SDA)**

The Panel is content that the SDAs' housing allocation is separate from the allocation to the individual districts in which they are located, reflecting the intention that the SDAs will meet sub-regional needs as a whole.

It is also content that the level of detail in Policy SH2 is justified as the basis on which local planning authorities will be able to prepare Area Action Plans for the SDAs. In terms of the relationship between brownfield and greenfield development, the Panel concludes that the scale of development entailed by the SDAs should not be made dependent on the availability of brownfield land in the urban areas since greenfield development in the SDAs is an integral part of the strategy. However, the pace of housing development should be coordinated with the rate of infrastructure provision and the role of the Implementation Agency.

- **Strategic Gaps**

The Panel recommends that Policy SH3 should be deleted as local gaps are matters for the local level to address. However, Policy CC10b (Strategic Gaps) is likely to apply because of the scale of the proposed growth. This could be reflected in Policy SH12. The Panel feels that this provides a more flexible approach to protecting the areas important for settlement shaping, while not sterilising any more land than is necessary.

- **Infrastructure**

The Panel concludes that current studies should provide the basis from which infrastructure requirements in South Hampshire can be planned, funded and delivered. It recommends that Policy SH14 (Environmental Sustainability) should include references to water management, green infrastructure and flood risk in the supporting text. The policy itself should refer to the need for decisions re additional waste water treatment infrastructure to take into account sustainability as well as cost.

The Panel recognises that (waste) water management studies will influence the funding/phasing of housing. The results of the Strategic Flood Risk Assessment (SFRA) could mean re-visiting the precise district apportionment of new housing.

On transport, the Panel accepts that there is real evidence of the integration between transport and the proposed land-use strategy. An area-wide approach to demand management may be needed to deliver sustainable travel patterns as part of the strategy of 'reduce-manage-invest'.

The supporting text to Policy SH10 (Transport) should also refer to Chickenhall Lane Relief Road, enhanced interchange facilities at Southampton Airport and specific rail improvements (Southampton - Midlands, Southampton - Winchester).

- **Implementation**

The Panel recommends that:

- Policy SH5 (Plan, Monitor and Manage) should be deleted as there was considerable confusion at the EiP about the detail and efficacy of the policy.

- Additional transport proposal listed in the Solent Transport Strategy should be added to the Implementation Plan to achieve a comprehensive demand management picture.
- Other major non-transport infrastructure schemes should be added as soon as this is justified by the further work.

Chapter 17 - Sussex Coast

The Panel accepts that the area faces particular challenges related to the weaknesses in the local economy and agrees that there is an urgent need to stimulate the economy and to achieve a better balance between jobs and housing. In order to achieve this, the Panel concludes that more coordinated effort is required and there is therefore a policy deficit in relation to the Sussex Coast which needs to be addressed through a sub-regional strategy.

- **Core Strategy**

The Panel concludes that the balance of the sub-regional strategy is sound but that the wording of Policy SCT1 should be amended to provide for the enhancement as well as the protection of the Sussex Coast environment. This is in recognition that the policy may imply an economic bias in the core strategy.

- **Spatial Strategy**

Although the Panel recognises that there is a limited range of options for locating future development in the Sussex Coast and that the existing urban areas need to play a key role, it recommends that a reference to Policy SCT1 is added to reflect the need to optimise the use of previously developed land, particularly in the largest urban area of Brighton and Hove.

It recommends that the core strategy policy should say that meeting the sub-region's housing target is likely to require sustainable urban extensions in Arun, Chichester, Rother and Wealden districts.

Although there were frequent comments at the EiP about the inadequacy of transport systems, the Panel sees no need to add to the core strategy given that Brighton and Hastings are designated regional hubs and are therefore already a focus for investment in transport.

- **Economy & Regeneration**

Although the Panel accepts that the Plan sees the whole of the Sussex Coast as an area in need of regeneration, it shares the view of most participants that it is right to focus investment and other support on those areas that exhibit the greatest economic and social needs. However, although there was general consensus that resources should be targeted on the areas showing evidence of greatest need for regeneration, there was disagreement about the priority given to towns in the east over those in the west. The Panel agrees with the Assembly and East Sussex CC that the problems are greatest mainly in the east.

While the Panel agrees that it is reasonable for Policy SCT2 to deal with investment and infrastructure and Policy SCT6 multi-agency working, it recommends that Policy SCT6 and its text should be included in the final section on Implementation and Delivery.

On job forecasts, the Panel acknowledges that the Sussex Coast is the only sub-region without a job estimate for the 2006-16 period.

It therefore recommends that this should be set at 30,000, which is the trend-based estimate given by SEEDA from the Experian standard regional forecasts published in October 2006. This level was accepted as "reasonable" by the Regional Assembly.

Where employment land is concerned, the Panel concludes that the real issue in the sub-region appears to be with the quality rather than quantity of employment land and that better quality sites are needed to attract the right businesses to move the sub-region up the 'value-added chain'. With this in mind, it considers that the strategy should acknowledge Brighton's key economic role as well as the importance of public transport improvements in the form of Brighton and Hove rapid transit (committed) and strategic interchange facilities (under investigation). It also attaches importance to the Polegate opportunity, given the relative scarcity of opportunities in East Sussex and the fact that it has the lowest GVA in the region apart from the Isle of Wight.

The Panel considers that it has little evidence to use in determining whether any new employment land is needed and do not therefore favour any form of crude conversion of the job forecasts into land estimates. It also does not agree with Policy SCT4 that local authorities should be prepared to allow for some infringement of environmental constraints in certain circumstances because of the scarcity of land and recommend the deletion of Policy SCT4(ii). In its replacement, the Panel suggests that Policy SCT4 makes it explicit that new employment opportunities

should be linked to the sustainable urban extensions in Arun, Chichester, Rother and Wealden which it has already suggested to should be identified in the core strategy.

- **Transport**

The Panel considers that more weight should be given to the rail network in the sub-region given capacity constraints on the highway network and it would be consistent with the RTS that as much new development as possible be related to the existing and possible new rail stations.

- **Housing**

Policy SCT7 sets a housing level of 54,000 (2,700 dpa) between 2006-26 which is about 14% lower than the RPG9 level for the whole of the 10 component districts/unitaries. The Panel is satisfied that a full range of options on the scale of housing growth was tested in the initial work and accepts that it is not a sub-region that should be expected to make a substantial contribution to meeting wider needs in the South East. However, the Panel feels that it is inappropriate to plan for housing levels significantly lower than those in RPG9 and therefore recommends that Policy SCT7 should be amended to provide for an annual average of 2,970 dpa and a sub-regional total of 59,400.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

The Panel supports the affordable housing target that at least 40% of new housing development should be affordable housing.

- **Implementation Plan and Infrastructure**

The Panel recommends that the sub-regional priorities should be mentioned in the text relating to infrastructure.

Chapter 18 - East Kent and Ashford

The Panel accepts the rationale for the sub-region, recognising that there is a need to spread the benefits of an Ashford growth area to surrounding areas; it will allow the sub-region to be marketed as a whole; and there is a common need to improve connectivity in this area at the periphery of the region.

- **Core Strategy**

The Panel feels that introduction to the strategy gives a good indication of the challenges facing this sub-region, although the importance of the Kent AONB should also be recognised. It agreed with most participants that Ashford provided the best opportunity for large scale inward investment that would hopefully provide spin-off advantages through supply chains to the rest of the sub-region.

- **Economy and Regeneration**

The Panel recognises that development agencies and partnerships have a major role in seeking to stimulate demand and development interest throughout this sub-region, but particularly in the coastal towns and recommend that a reference to this be added to Policy EKA4.

Referring to the extensive discussion at the EiP on Lydd-Ashford International Airport, the Panel concludes that it would be inappropriate to refer to the potential role of the airport in the Plan. It makes it clear; however, that this does not indicate that growth will be prevented but that the case for expansion should be determined through the development control process.

On jobs forecasts, the Panel accepts the figure of 50,000 jobs as a policy led target but acknowledge SEEDA's advice that its achievement is heavily dependent on the success of Ashford and the hoped-for transformational effect of the CTRL. It also acknowledges that this target implies a higher rate of job growth than labour supply which is a reasonable objective given the nature of the sub-region's commuting patterns.

As with other sub-regions, the Panel feels that the issue for employment land is one of quality rather than quantity and the fact that rental levels are not high enough to encourage investment in the necessary infrastructure or access improvements to unlock existing provision. Where new employment land is concerned, the Panel recommends that the fundamental objective of exploiting potential at locations served by CTRL domestics should be included in the core strategy.

The Panel agrees with Kent CC that the objective to attract knowledge-based jobs at Ashford should still remain in Policy EKA7 but that the location should instead relate to the urban growth area and not include a specific reference to Wye Campus, particularly since Imperial College has already indicated that it was no longer pursuing the proposal for Wye Campus.

- **Settlement Shaping**

The Panel accepts that investment in new sources of water supply will be necessary to meet the proposed growth.

On flood risk, the Panel is satisfied that a process is in place to manage flood issues at Ashford.

The Panel recognises that the plans for Ashford include transport infrastructure without which development cannot proceed, which includes the new M20 junction 10A. It is less clear what influence transport has had on the remainder of the area (outside Ashford) as transport studies have not been completed. Where the Dover area is concerned, it does not support it as a regional hub but do accept that the international dimension of the town's cross channel ferry services make it unique in the region. It believes that this is reflected in its 'Gateway' status and the three regional spokes that connect the town. It also recommends that the corridor north from Dover to Thanet be designated as a regional spoke.

- **Housing**

The Panel recommends an increase from 48,000 dwellings to 53,000 (2,650 dpa) which it feels would better reflect regional imperatives and local needs. This partly reflects the fact that the sub-region has the least stress on its strategic highways network and will also benefit from major public transport accessibility improvements from the introduction of CTRL domestic services in 2009.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

On Affordable Housing, the Panel concludes that it is justifiable to set a lower level (30%) than the regional target (35%).

- **Implementation**

The Panel welcomes the establishment of the Ashford's Future Delivery Board and strongly endorses the partnership working on delivery mechanisms and the business planning approach that is leading to a costed implementation plan for capital expenditure.

The Panel concludes that transport improvements are so vital to support the spatial planning framework that a separate section is justified. It also considers that, given the gateway status, landside access issues to Dover Port are particularly important and are concerned about the short-term disruption that accompanies Operation Stack.

Chapter 19 - Kent Thames Gateway

The Panel supports the Plan's approach to the scale of development which reflects the need to relate housing provision to local economic performance, recognising that the overall level of job growth will be challenging. It also accepts that the enhancement of the capacity of transport and upgrading of the skills base are fundamental to the success of the strategy.

The Panel supports the focus on previously developed land (PDL) and accepts that over-reliance on additional land-release involving sensitive greenfield land is likely to detract from the main regeneration thrust.

While endorsing the general coherence of the resulting sub-regional strategy, the Panel is concerned that the Plan does not give sufficient recognition to the fact that the sub-region forms part of a nationally defined growth area with a shared vision. It also feels that it is unclear whether the Plan's assumption about greater self-containment among individual towns is either realistic or desirable

- **Core Strategy (Policies KTG3 and KTG7)**

Although the Panel supports the general policies, it notes that it does not explicitly address the balance between economic and environmental factors. It recommends that Policy KTG3 be reworded to make it clear that "as a first priority full use of PDL for new development should be made and when this is no longer possible, use other land for urban extensions". It also recommends major development be located to exploit the potential of regional hubs at Ebbsfleet and Chatham and locations served by the CTRL.

- **Economy**

The Panel accepts the employment forecast (for monitoring purposes) of 58,000 as a policy-led figure which it acknowledges will be challenging.

It recognises that pitching a job target at this level would imply a higher rate of job growth than new housing, which in their view, is a reasonable objective given that the sub-region is currently a substantial exporter of labour.

They agree with some participants that the development of Ebbsfleet, improved connectivity, and the 'Olympics effect', should help the attractiveness of the area to high value jobs. With this in mind, the Panel agrees with the London Councils that a positive stance should be taken towards knowledge industry economic development in outer east London as well as North Kent, and that this should form part of the joint approach needed across the London boundary. To support this emphasis on

knowledge-based activities, the Panel agrees that Policy KTG6 already provides appropriate policy support for the Kent Science Park as this is qualified.

On town centres, the Panel recommends that Policy (KTG6) should contain a stronger message about the role of Chatham and Ebbsfleet than the existing factual statement that they are transport hubs.

- **Settlement Shaping**

In terms of water supply and waste water treatment, the Panel accepts that on the basis of present evidence the main impact is likely to be on the phasing of development rather than influencing the level or location of new housing.

On flood risk management, the Panel agrees that the seriousness of flood risk in this sub-region should be dealt with through policy but notes that the Environment Agency's (EA's) current study of the Thames Estuary 2100 will need to be taken into account when published in 2008. Although the Strategic Flood Risk Assessments (SFRA) indicate that there are several major development sites at risk from flooding, the precise implications for land supply of flood risk cannot be established until detailed flood risk assessments have been undertaken at the local level.

The Panel acknowledges that it is possible that some LDF site allocations might need to be revised in the light of this and the Defra forecasts. In the meantime, the Panel is reassured that for strategic planning it is reasonable to assume that at the proposed level of growth the flood risk in KTG can be dealt with.

- **Transport**

The Panel accepts that (notwithstanding the Channel Tunnel Rail Link and its impact) difficult transport thresholds are being approached and concludes that this reinforces the importance of sustainable transport measures as an integral part of the strategy. In Thameside, it agrees that the scale of development proposed should be manageable in transport terms. In Medway it accepts that further studies are needed to specify improvements to strategic bus corridors, local rail services and highway access to new development areas. In the sub-region as a whole, the Panel agrees with the Assembly that reliance on the private car to accommodate forecast growth in travel demand is a cause for concern. It considers that its designation as a Growth Area provides an opportunity to be proactive in shaping future travel demand patterns and that this theme is so critical to the sub-region that it should be more prominent in the Core Strategy.

- **Housing**

The Panel considers that the proposed housing provision is “broadly of the right order”. It shares the view of the Assembly, SEEDA and the local authorities that it is important not to set the housing target so high that it puts pressure on the authorities to permit housing on sites suitable for employment use and/or force the release of greenfield sites and/or adds to out-commuting. The Panel concludes that it would be more appropriate to focus on increasing employment to support new housing development and unlocking sites already earmarked for development before considering whether a further increase to correspond more closely to site capacity can be justified in the next RSS review.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

On affordable housing, the Panel is persuaded that the target of 30% is justified.

- **Implementation**

The latest position on the Lower Thames Crossing (LTC) study should be covered in the text but the Panel does not consider it appropriate to describe the scope of studies for a LTC in an RSS policy. The reference should say that while the LTC would primarily form an inter-regional strategic route it would have important implications for the local economy of KTG and would support the planned growth in north Kent.

The Panel recognises that the large number of projects for which funding has yet to be identified is clearly a major challenge for the implementing agencies.

On institutional arrangements, the Panel notes that the Interim Plan concludes that Government does not aim to create any new permanent structure on the basis that the production of the Interim Plan demonstrates the value of a forum for prioritising across each sub-region.

Chapter 20 - London Fringe

On balance the Panel concludes that the sub-regional strategy is necessary to address the combination of contextual issues and challenges shared by the districts around London’s southern fringes, and would mirror the London Arc in the emerging East of England RSS.

- **Core Strategy**

The Panel concludes that the approach to the sub-region needs to be creative in order to protect the environment while addressing economic needs and that Policy LF1 fails to do this. In particular, the Panel feels that the approach taken to the Metropolitan Green Belt (MGB) is fundamentally wrong as it starts from the position that there should be no alterations of any substantive nature. It also concludes that the strategy underplays the role and potential for sustainable growth of the three regional hubs - Guildford, Redhill / Reigate and Woking - particularly Guildford. Where Redhill / Reigate is concerned, it finds it ironic that this is now included in a New Growth Point yet its overall housing provision is less than that envisaged in RPG9.

The Panel recommends that Policy LF1 be amended to provide a more positive strategy about the need to sustain the important role played by the economy in the wider region and beyond, and to meet housing needs, whilst retaining the overall quality of life.

- **Economy**

This is the only sub-region that the Assembly and SEEDA did not agree a job estimate for monitoring purposes. The Panel accepts that it would be unrealistic to expect an exact match between labour supply and jobs given the complex labour markets and proximity to London, but is concerned about the scale of the mismatch and about the over-reliance on 'smart growth'. To redress this, the Panel recommends an increase in the housing level of 23% but recognises the importance of monitoring the scale of new jobs and labour supply.

While the Panel supports the general approach to employment land, focusing on re-use of existing employment land and town centres, and the local authorities view that there is no overall shortage of employment land, it is concerned about quality and variety to satisfy the range of needs. However, it is satisfied that the Plan, Monitor and Manage (PMM) approach advocated by Surrey CC would be capable of addressing these needs providing the right monitoring arrangements are in place. If new provision is needed, the Panel recommends that this is provided in the urban extensions proposed in the sub-region and in the redevelopment of the DERA site in Chertsey (see Housing section below)

- **Settlement Shaping**

The Panel concludes that water supply and waste water treatment issues have not played a significant part in shaping the strategy other than influencing the phasing provisions.

Flood risk has, however, influenced the strategy but detailed studies are needed to address the impact at the local level.

The strategy has not been influenced by transport capacity given the acceptance that existing congestion levels are already high throughout the sub-region. The Panel agrees this means that wherever growth is located it will add to congestion. It accepts that all three hubs require to be supported by additional infrastructure investment to enable them to fulfil their regional role. The Airtrack scheme, if implemented, will strengthen the role of the Guildford and Woking as hubs.

- **Housing**

Given the concerns about the mismatch between labour supply and jobs and the fact that the proposed housing provision in the LF will not even allow for natural change in the population, the Panel recommends an increase from 37,360 to 46,120 (2,306 dpa). Whilst it accepts that urban potential estimates are uncertain, particularly in the longer term, there is strong evidence to suggest that the reliance placed on PDL sources has been associated with a failure to undertake genuine testing of the opportunities to accommodate a higher level of provision.

In terms of accommodating the additional housing, the Panel considers that urban potential may deliver more and acknowledges that some alterations to the MGB will be required but that this is necessary because the need for additional housing in this part of the region is so great.

It recommends that the hubs should be the focus of additional housing and that; a selective review of the MGB should focus on the area to the north-east of Guildford; if required, a selective review of the MGB around Woking focusing on the south of Woking; smaller scale MGB reviews around Redhill and Reigate and, given the proximity to Tandridge, this applies here as well. The Panel also recognises that all district allocations within the sub-region may require small releases of Green Belt to accommodate the recommended increases.

An additional 300 dwellings (15 dpa) is allocated to Runnymede, most of which is to be provided on the DERA site at Chertsey. It recommends that this should be allocated as part of a mixed-use development, adding 2,500 dwellings to the Borough's total.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

On affordable housing, the Panel supports the 40% target in the Plan and non-residential development making a contribution to affordable housing where appropriate.

- **Implementation**

The Panel strongly endorses the need for a joint approach to infrastructure funding as advocated in the Plan and welcomes the positive work being done in Surrey on the tariff approach. Although there are some concerns about how this will operate in practice, on balance the Panel commends joint working on a tariff to fund infrastructure from small sites to mitigate the impact of cumulative development in a revised Policy LF5.

Chapter 21 - Western Corridor and Blackwater Valley

- **Overview and Rationale**

The Panel accepts the rationale for the sub-region and argues that, given the complex pattern of local government, the high economic potential of the area, the tight labour and housing markets, the proximity to Heathrow and west London, the pressure on environmentally constrained land and the demands on infrastructure especially transport, there is a very strong case for a sub-regional approach to dealing with these issues. It does not propose any changes to the boundaries of the sub-region.

- **Core Strategy**

The Panel recommends a core strategy policy for the sub-region up-front which:

- Should be based on Policy WCBV1 (with the last sentence reworded to refer to 'transport investment and development in the sub-region') with Policy WCBV2, and paragraph 2.5 of the supporting text (which describes where development should be focused).
- Should take account of:
 - balancing of economic growth with transport and environmental considerations
 - settlement structure including role of hubs
 - guidance on the accommodation of new development
- Should recognise the strategic role of the greater Reading area as a focus for development and transport investment, and the need for a new planning and delivery vehicle for the greater Reading area.

- **Economy**

The Panel considers that the sub-region's unquantified approach to employment land is 'regrettable' and would be loathe to see the allocation for north Hants deleted.

It recommends that Policy WCBV4 should encourage employment land reviews to be undertaken jointly between authorities where appropriate and that the supporting text should be more explicit about the type of employment assessment that should be undertaken.

It is not convinced that it is possible to identify specific sources of strategic employment demand at this stage; however, it recommends that the supporting text should acknowledge that there may be some scope for greenfield release if a research-based science park linked to the University of Reading can be justified.

The Panel considers that the stronger priority given in the sub-regional strategy to retention of employment land than in regional policy RE2 is appropriate. While it recommends Policy WCBV4 should emphasise making more efficient use of existing employment land, it feels that criteria (i) and (ii) of the existing policy are too restrictive as they overemphasise local considerations to the exclusion of strategic. It therefore recommends that Policy WCBV4 be amended to give consideration to strategic needs and to generalise the need for a balance with labour supply.

The Panel is concerned about the scale of the projected mismatch between jobs and labour supply in the sub-region which is the highest in the South East. This imbalance is concentrated in the Thames Valley but is also apparent in the Blackwater Valley districts adjoining the London Fringe.

The Panel recommends that Policy WCBV5 on smart growth be deleted from the sub-regional strategy and incorporated into the proposed new policy in the Regional Economy chapter. It considers that there are limits to the extent of adjustments that might be expected through smart growth mechanisms in the sub-region, and that:

- It would be unwise to assume significantly higher productivity levels, but that there may be scope for making more productive use of the available labour supply through training and skills upgrading.
- There may be scope for enhancing economic activity rates among certain groups, and some scope for additional labour force from people working later in life.
- It is unwise to rely to any great extent on commuting adjustments.

- **Settlement Shaping**

The Panel considers that there are areas where some alterations to the Green Belt boundary might be the most sustainable option for locating new housing and

employment. However, it feels that national and regional policies provide sufficient guidance on the Green Belt and other nationally designated areas, and on the location of urban extensions.

The Panel acknowledges the uncertainty about waste water treatment at Basingstoke and recommends a footnote to the housing figures in Policy WCBV3 making them subject to phase 2 of the Water Cycle Study. It is reassured that further growth in the Blackwater Valley can almost certainly be accommodated.

The Panel agrees that there is not much evidence of any spare capacity on transport networks. It accepts that the heavy congestion on road (and some rail) will place greater emphasis on the need for effective local traffic management and demand management measures, and conclude that both transport investment and future development should be strongly related to the polycentric pattern of the hubs.

- **Overall Housing Level**

The Panel considers that the overall level of housing provision for the WCBV is significantly too low because economic and demographic forecasts have been given insufficient weight, while too much weight has been given to avoiding greenfield development.

It therefore proposes increasing the total housing provision from 89,520 to 107,600 - which equates to an increase in annual average provision across the sub-region from 4,476dpa to 5,380dpa. In reaching this conclusion, the Panel has given particular weight to demographic factors and to the imbalance between economic forecasts and housing requirements.

The Panel does not question the basis of the existing distribution in the Plan, but sets out their rationale for allocating the additional recommended housing, including past completion rates, New Growth Point (NGP) designations and identified potential. It recommends significant increases for all Berkshire authorities within the sub-region, but particularly:

- Reading - in recognition of its status as a regional hub, a RES diamond, an NGP and the 'capital' of the Thames Valley (1,800 additional dwellings).
- West Berkshire - to provide a Strategic Development Area (SDA) to support the greater Reading area (to be called South Reading SDA) of 7,500 dwellings, all of which is additional to West Berkshire's current allocation.
- Wokingham - the Panel concludes that land south of the M4 has potential to accommodate 2,500 houses and that other areas (eg north and south of

Wokingham) could provide an additional 1,000. However, it also accepts that a reduction of 1,500 should be made for Aborfield Garrison, giving an extra 2,000 overall dwellings (70 dpa).

- Bracknell Forest - an additional 2,000 dwellings (100 dpa) with the acknowledgement that this will be challenging.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

- **Implementation**

The Panel recommends that Policy WCBV6 be deleted, and the provision of infrastructure be addressed in a new section on infrastructure and implementation. It is not convinced that all the transport schemes identified are of sub-regional significance.

The Panel identifies Crossrail, the Reading Area Bottleneck, Airtrack, the Great Western Mainline improvements and journey time reliability measures on the M3 and M4 as of wider than sub-regional significance. It recommends:

- Crossrail - Planning should start now for the extension to Reading.
- Reading Station - Early implementation as essential in the planned growth of the greater Reading area.
- Airtrack - If the scheme does not progress further, investigation should be undertaken of the 'western connection' link from the GWML onto the Heathrow rail spur.

It considers that there is a case for the Highways Agency to re-examine the options for increasing and managing the capacity of the M4 in the Thames Valley, taking account of the need to facilitate the planned growth of the greater Reading area. It also recommends map T2 be amended to include a spoke linking High Wycombe to the Thames Valley at Maidenhead.

- **Institutional Arrangements**

The Panel considers that there is a particular need for more effective coordination between local authorities in relation to the greater Reading area, transport planning, and the Blackwater Valley. It recommends:

- A Greater Reading Development Partnership for the greater Reading area ('a joint delivery vehicle with executive posers to provide strong and coordinated leadership') to:
 - o oversee a Growth Delivery Programme, to identify and manage the programme of work necessary for the growth agenda to be met; and
 - o produce a joint Core Strategy or LDD to set out clear objectives and key policies on important spatial planning issues for greater Reading as a whole.

- The extension of Berkshire's strategic transport group to include the three counties, Thames Valley Economic Partnership and transport operators.

- Joint working in the Blackwater Valley, with authorities working together on their respective Core Strategies and on the implementation of elements of the sub-regional strategy.

Chapter 22 - Central Oxfordshire

The Panel concludes that there is sufficient justification for the sub-region, not least because it feels there are enough challenges to merit a new approach in the area that will not simply deliver previous structure plan growth policy. This is proven by the view that alternative options for higher levels of growth were inadequately tested. It also concludes that the boundaries for the sub-region are justified.

• Core Strategy

The Panel recommends that there is more recognition in the strategy about the inter-relationships between the adjoining sub-regions and in particular, acknowledgement of the Oxford to Cambridge Arc. It feels that the main divergence of views at the EiP was whether the economic potential of the area could be 'Oxford-centred' or one that distributes growth to the surrounding towns. Key to the conclusions is whether there is sufficient justification for a release of Green Belt. The Panel concludes that the growth needs of the sub-region will have to be met through a parallel approach of Oxford with growth in Didcot, Wantage/Grove and Bicester, with a strategic urban extension to Oxford which it feels can be accommodated "without damaging its setting but with significant benefits to the economy and housing affordability". It feels that their recommendations for the strategy would strengthen the polycentric nature of the area whilst accommodating the needs of Oxford City.

- **Economy**

The Panel rejects the job estimate put forward by the Assembly (16,600) opting for a trend based figure of 18,000 as the monitoring estimate for 2006-2016.

On employment land, the Panel concludes that it would be wrong for Oxford to rely primarily on previously developed land and although there is no numerical evidence that new employment land will be needed, it was persuaded that some new land will be needed. The strategy should therefore acknowledge that a range of opportunities will be needed in both Oxford and the surrounding towns.

The Panel has concerns about the imbalance in labour and jobs and that this is likely to worsen over the second half of the Plan period. Its recommendations on housing provision and distribution aim to address this in part.

- **Settlement Shaping**

Although the Panel supports the function of the Green Belt as set out in Policy CO3, it acknowledged that the most recent Structure Plan EiP Panel envisaged that changes to the boundary may be needed in the future. It concludes that there are exceptional circumstances to justify a review of the Green Belt.

The Panel accepts that transport needs were used to shape the strategy; there was no testing of alternative transport impacts because the spatial options' testing was "relatively superficial".

On water supply, the Panel concludes that, assuming a new supply is provided (through an Upper Thames Reservoir) this should have no impact on housing distribution. Nor are there any overriding constraints in terms of water quality.

Although not all the Strategic Flood Risk Assessments were completed, the Panel was satisfied that this had been taken into account.

- **Housing**

The Panel recommends that housing provision should be 40,100 (2,005 dpa) to reflect "regional imperatives" (including economic potential) and the needs of Oxford city. This is an increase of 6,100 (305 dpa). This includes provision in the New Growth Points at Didcot and Oxford, and a strategic urban extension of 4,000 dwellings (Strategic Development Area) by 2026 on the southern edge of Oxford which will require a "highly focused selective" review of the Green Belt. To deliver this, Oxford City Council and South Oxfordshire DC should develop a joint Area Action Plan if their LDF core strategies have been completed by the time of the adoption of the RSS.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

On affordable housing, although the Panel accepts the case for a higher target than the regional target of 35%, it does not agree that this should be as high as 50% as this is unrealistic. It therefore recommends a target of "at least 40%".

Chapter 23 - Milton Keynes and Aylesbury Vale

The Panel is concerned that the Part A statement of the Milton Keynes South Midlands Sub-regional Strategy will not continue to provide an overarching framework for the Growth Area and recommends that the key messages of the Part A statement, as identified by the Panel, should be incorporated into the sub-regional strategy.

- **Strategic Framework**

The Panel finds the strategy weak in providing guidance on the integration with adjoining sub-regions and regions, and the interrelationship between Milton Keynes and Aylesbury. To help address this, it recommends that the Oxford to Cambridge Arc concept has a higher profile which will have the benefit of linking this sub-region with the adjoining Central Oxfordshire, and with the Bedford growth area and the Cambridge sub-region within the East of England Plan. The vision for the Arc will depend on improved orbital communications and the reinstatement of the East-West Rail Link should therefore be clearly stated in the strategic framework.

The strategic framework should also set out the challenges facing the sub-region and in the Panel's view these are:

- Strengthening the economic role of Aylesbury town and reducing its dependence on out-commuting.
- Continuing to assimilate high levels of new growth.
- Improving skills levels and educational attainment.
- Improving connectivity between Aylesbury and Milton Keynes, as well as between Aylesbury and the more buoyant economies in the adjoining sub-regions.

It also suggests that, although Milton Keynes has a clear identity in the strategy, the role of Aylesbury town needs to be expressed more clearly.

- **Economy**

Although the Panel feels that the inclusion of above trend job growth estimates for this sub-region is consistent with the role of Milton Keynes and Aylesbury town as growth areas, it is concerned about the Plan's job growth estimate for Aylesbury Vale district (equivalent to 1,060 jobs pa), which is over 60% above that included in the MKSM strategy (635 pa). Because of this, it recommends that these are called targets for consistency with the regeneration sub-regions, although with the clarification that they are not intended to be a constraint to economic development and will be subject to review.

Jobs and labour supply are broadly in balance in the sub-region. However, the Panel is concerned that the use of the Plan's jobs to new homes ratio (1:1) could be used to imply a way of slowing down the delivery of new housing. Although it accepts that this was not the intention, it suggests changes to clarify this.

It rejects the proposition from Aylesbury Vale and others that this should be increased to 1:1.25 as this would be fine-tuning a monitoring ratio which is influenced by several labour market factors.

The Panel is concerned about the degree of protection afforded to existing employment land and recommends that the need for rigorous assessment, particularly close to the town centre (Aylesbury), is reflected in E8.

- **Housing**

The only aspects for discussion at the EiP were the longer term housing levels for both growth areas and the remainder of their districts, beyond that included in the recently adopted MKSM strategy. The housing provision proposed for Milton Keynes urban area between 2021-26 (2,370 dpa) represents 50% of the indicative longer term rate in the MKSM strategy. The Panel is not persuaded by the argument put forward by developers that as the MKSM strategy indicative rate was prefaced by the words "at least" higher rates should be sought.

Although acknowledging that it is not normal to carry forward any shortfall between one plan and the next, the Panel recommends that the underperformance against MKSM housing levels 2001-06 should be made up in the Plan period, which reflects the special circumstances of there being a 2001-31 target within the Sustainable Communities Plan.

On the rest of Milton Keynes District, the Panel feels that there is no reason to challenge the proposed level. It disputes RPS's suggestion that the rest of district level should be increased on the basis of national household projections since it is the Milton Keynes urban area that is intended to provide capacity for.

The Panel feels that there are several factors that demand a degree of caution when considering Aylesbury's housing provision levels:

- Even if an East-West Rail link is reinstated, Aylesbury town may only benefit in the longer term since the spur to Aylesbury is not in the base business plan currently being progressed.
- Policy led employment projections assumed in Policy MKAV2 appear to be ambitious which risks an increase in out commuting particularly to London.
- Aylesbury Vale has the third highest district housing level in the region.

It therefore concludes that there is no justification for amending the proposed 2021-26 housing levels.

Housing provision for the whole of Aylesbury Vale District is based on a split of 80% to Aylesbury town and 20% to the rest of the district. Apart from a requirement to provide for rural communities and to meet affordable housing needs, the Panel is persuaded that sustainable opportunities for growth could exist at Buckingham and Winslow.

The Panel rejects the affordable housing target of 40% for the Aylesbury growth area and recommends that reference to affordable housing being sought at the same rate as the regional target (35%) is made in the text.

• **Longer Term Expansion of Milton Keynes**

The MKSM strategy identified four general directions of growth to the west, south-west, south-east and east. The Panel is concerned that, given the significant level of disagreement over where and how future expansion of the city should take place, if the South East Plan merely includes general directions of growth, the current level of uncertainty would continue. It rejects the argument that it does not have the evidence to make a considered judgment on the size and location of future extensions.

It does not accept the suggestion of Professor Lock that the potential capacity within the existing urban area of Milton Keynes should make no contribution and

conclude that the figures in MK 2031, as revised at the EiP by Milton Keynes Council, provides a reasonable estimate of the potential capacity of the existing urban area.

In terms of whether the strategy for the future expansion of the city should be through dispersal or Strategic growth areas, the Panel concludes that there was little support for a more dispersed pattern of growth and that it would be preferable for the city to expand through the provision of planned strategic development areas. It also concludes that there is insufficient justification to revisit the area to the north of the city.

It therefore considered where the proposed extensions would be best located having regard to the criteria identified by the Regional Assembly and the other factors discussed at the EiP.

Taking all these factors into account, the Panel's view is that the development to the south-east is likely to be the most sustainable and that development to the east of the motorway during the Plan period would be less sustainable or deliverable than development to the south-west. Consequently, it endorses the directions of growth identified in MK 2031.

As for the phasing of the extensions, the Panel feels that it would be sensible to bring both the SE and SW extensions forward together rather than leaving the commencement of the extension to the south-west to the last five years of the Plan period, as proposed in MK 2031.

The Panel rejected the suggestion by a number of participants that the period for the South East Plan should be extended to 2031.

- **Implementation**

The Panel agrees that implementation of the East-West Rail will require the Consortium (or another formally constituted body) to take executive powers in order to be accountable for levying of any tariff for the investment in rail infrastructure. It therefore recommends that the text explains the organisational arrangements intended to levy and hold developer contributions towards reinstating an East-West Rail link.

It also recommends that a revision will need to be made to the East of England RSS before the planned extensions can go ahead as the Government's proposed changes to the East of England Plan are silent on the possibility of an urban extension into Mid Bedfordshire and this Panel Report will probably be too late to influence the Plan as adopted.

In the longer term the Panel suggests that consideration will need to be given to the joint arrangements for taking development control decisions and to allow the Milton

Keynes tariff to be collected, or whether the Urban Development Authority boundary should be extended.

It notes the confidence expressed by the Regional Assembly about the robustness of the assumptions made in relation to infrastructure provision, and in general, accepts that this confidence is justified by the extensive analysis of infrastructure and costs undertaken. It also agrees entirely with the Regional Assembly about the strategic importance of East West Rail which supports the economic objectives of the sub-region as part of the Oxford to Cambridge Arc and offers opportunities to make the best use of land through higher density development at rail nodes and interchanges.

Chapter 24 - Gatwick

The Panel supports the inclusion of the sub-region on the geographical basis proposed in the Plan. It does not feel that it would be justified to change the boundary to include the Redhill / Reigate hub but recommend closer working between the Gatwick and London Fringe Sub-regions, recognising the role the hub plays in both.

- **Core Strategy (Policy GAT1)**

The Panel recommends strengthening the strategy to reflect the role Crawley-Gatwick has in the sub-regional economy, Gatwick Airport's international gateway role and the interrelationships with London and the South Coast. It concludes that the main thrust of the strategy should be to "manage the potential of all growth elements coming together in an area of environmental constraint". It considers that the policy framework provides adequate environmental safeguards, especially in light of changes made to reflect the Appropriate Assessment.

- **Economy (Policy GAT4)**

The Panel considers the gap between forecast labour supply, which is marginally more than jobs, to be insignificant and therefore accepts the Assembly's proposed employment target for monitoring purposes of 17,400.

On Gatwick Airport, the Panel concludes that the Plan's approach, which aims to support development of the airport within currently agreed levels of growth, is appropriate, subject to safeguarding land for a second runway. It further points out that a decision to approve a second runway will be a significant enough issue in its own right to trigger a review of the RSS.

The Panel feels that there is no convincing case for identifying new strategic employment sites through the RSS but it does accept the need to refer within the

policy to the need for a university campus at Crawley to support the Diamond initiative, which is already included in the Implementation Plan. It acknowledges that a good stock of modern commercial and office accommodation is also needed to support continued economic prosperity but feel that there is no evidence to suggest that this could not be provided through re-use of brownfield sites.

- **Settlement Shaping**

The Panel acknowledges the importance of transport corridors on the spatial strategy for the sub-region and particularly supports the work to improve and extend Fastway. However, it is not persuaded that there should be more emphasis on the corridor between Redhill and Crawley because of the narrow gaps between settlements and the uncertainty about the Brighton Mainline Route Utilisation Strategy.

As with the London Fringe, the Panel is concerned that options for a higher level of growth in Surrey were insufficiently tested and as a consequence, selective or strategic reviews of the Green Belt were not considered. It is proposing a small scale review of the boundaries around Redhill/Reigate (within the London Fringe) but also a very limited review around Salfords and Horley.

On strategic gaps, the Panel accepts that because of the settlement pattern in this part of West Sussex, some strategic gaps will still be necessary but these must be designated and regularly reviewed in line with Policy CC10b (as proposed to be amended by the Panel). By implication, some of the existing gaps will no longer be appropriate. It specifically rejects the need for a new strategic gap around Gatwick Airport as this would not accord with Policy CC10b.

On water supply, the Panel concludes that the water requirement for the Plan period can be provided and that, with certain provisos, there is no fundamental constraint on development.

In terms of water quality, although the Panel accepts that this is a concern in the sub-region, it is satisfied that the waste water treatment issues have been factored in.

Although the Panel accepts that flood risk is of concern in this area, it concludes that on the evidence considered, a slightly increased level of provision could be accommodated. It recommends, however, that a specific reference to managing flood risk be added to the supporting text.

- **Housing**

The Panel concludes that there is no demographic or economic case to substantially increase the amount of housing proposed in the sub-region and that this represents

a balanced response to the factors that should be taken into account. It proposes a marginal increase from 33,000 to 34,500 (1,725 dpa) to reflect the need generally for more housing in the South East, especially more affordable housing, acknowledging that this will increase the exiting challenge for the local authorities.

A summary of the district and sub-regional allocations are included in Annexes 1 and 2.

As with other sub-regions, the Panel feels that Policy H4 provides adequately for affordable housing and therefore recommends the deletion of Policy GAT2, with reference to 40% target supported and appended to Policy GAT2 as an "Indicative Target".

Chapter 25 - Isle of Wight

The Panel concludes that the Isle of Wight should be recognised within the RSS due to its continued need for economic regeneration. However, it does not feel that it is necessary to call it a Special Policy Area and therefore recommend that it is designated as a sub-region.

The Panel is sympathetic to those who were concerned that there was insufficient recognition given to the environmental assets of the Island and therefore recommend some generic and specific policy amendments to strengthen this.

- **Economy and Regeneration**

Although the Assembly's job growth estimate for monitoring purposes forecast a net loss, the Panel agrees with the Assembly, SEEDA and the Isle of Wight Council that this is not compatible with a regeneration focused strategy and therefore recommends a policy led target of 7,000 new jobs between 2006-16.

- **Housing**

The Panel recognises that there is a significant mismatch between the number of jobs forecast and the forecast labour supply but are concerned that, amongst other things, increasing the level of housing will just attract more second home owners. No changes to the level of housing (10,400 - 520 dpa) are therefore recommended.

Chapter 26 - Rest of County Areas

The Panel concludes that there is no policy deficit for the 'rest of county' areas as the national and RSS policy framework provide adequate policy direction for LDFs. It does, however, accept that there is a lack of spatial profile for these areas and recommend a new section in the Plan to deal with the 'rest of county' areas.

- **Rest of Hampshire**

Although the Panel is satisfied with the level of housing proposed in the rural parts, it concludes that there is more potential through strategic brownfield sites in public ownership and sustainable urban growth in the main settlements as follows:

- 2,500 dwellings at Whitehill Bordon (pending the outcome of more detailed studies).
- 600 additional dwellings (30 dpa) for Test Valley (focused on Andover).
- 1,800 additional dwellings (90 dpa) at Winchester (with any greenfield releases to be focused to the north of the city).

The Panel concludes that there is no case for a new community at Micheldever Station.

- **Rest of East Sussex**

Although the Panel does not recommend any major increases in housing, it does consider that an increase of 600 dwellings (30 dpa) is justified in the rest of Wealden, focused on Uckfield.

- **Rest of West Sussex**

The Panel considers that an increase of 600 (30 dpa) dwellings in the rest of Horsham would be appropriate to reflect the brownfield potential.

- **Rest of Kent**

The Panel recommends an increase of 3,880 dwellings in this area mainly to meet economic and demographic needs, with most of this to be accommodated at the regional hubs - Maidstone (1,880 dwellings - 94 dpa), Tonbridge and Malling (500 dwellings - 25 dpa), Tunbridge Wells (1,000 dwellings - 50 dpa).

Although the Panel accepts that the Mid Kent and Medway Towns-Sittingbourne Gaps accord with Policy CC10b (as recommended to be revised by the Panel), it recommends that the boundaries are reviewed through the LDF process. The Panel recommends two separate policies for the Maidstone and Tonbridge / Tunbridge Wells Hubs. It also endorses the proposed joint Tonbridge / Tunbridge Wells Hub with the view that this would encourage a joint approach to planning the towns and consequently, more joint working between the respective local authorities.

- **Rest of Surrey**

The Panel is not convinced that a different approach to Farnham is appropriate and the town therefore remains outside the sub-regions.

The Panel considers that, because of the rural nature of the parts within Mole Valley, Guildford and Tandridge, any increase would be unsustainable and probably lead to the undesirable pressure for allocation of greenfield sites.

In terms of the housing provision in Waverley, the Panel agrees that there is very limited potential for the borough to contribute more but still feels that there would be scope for a small increase in the figure. It recommends an increase of 400 dwellings (20dpa).

Although the Panel acknowledges the innovative proposal put forward for Dunsfold Park, it concludes that this would seriously unbalance the regional strategy and is likely to be unsustainable due to its location and accessibility.

- **Rest of Berkshire**

The Panel acknowledges that the existing housing provision for this part of the region will be challenging and therefore do not recommend any additional housing.

- **Rest of Oxfordshire**

The Panel accepts that some caution is needed when applying demographic trends to housing provision; it considers that there is sufficient justification on the grounds of local needs for an increase in housing numbers.

It recommends in Chapter 22 that 300 dwellings (15 dpa) from the Vale of White Horse should be transferred from the sub-regional allocation to the 'rest of county' to avoid unnecessary release of greenfield sites but do not recommend any increase to this allocation. It recommends an increase of 1,000 (50 dpa) for Banbury mainly to reflect its economic role. It does not recommend any increases to South or West Oxfordshire.

- **Rest of Buckinghamshire**

The Panel considers that there are grounds for a modest increase and recommend an additional 500 (25 dpa) for Chiltern and 200 (10 dpa) for Wycombe.

Chapter 27 - Implementation

- **Mechanisms and Delivery Agencies**

The Panel welcomes the emphasis given by the Assembly to implementation generally and congratulates the Assembly and its partners for breaking new ground in the delivery of strategic policies.

The Panel recommends a new section in the Plan on Implementation, Monitoring and Review which would expand on the key principles set out in Policy CC5:

- Achieving a close relationship between development and infrastructure.
- Timely delivery of services in relation to new housing.
- The necessity of a joint approach to infrastructure planning with delivery agencies.

The new section will complement the Implementation Plan and will include the following:

- Co-ordination with adjoining regions - to provide a much stronger commitment to joint working with London and the East of England.
- Joint working and delivery agencies - to include alignment of investment priorities of delivery agencies and creation of local delivery vehicles.
- Delivery mechanisms including behavioural change - should pick up behavioural change, particularly in relation to transport, waste, water and energy, and should highlight the need for fiscal incentives and regulatory changes to deliver this.

- Funding arrangements - should recommend a blend of mechanisms including, longer term commitment by Government to sustained public sector funding at a level commensurate with the scale of growth; enhancement of local tariffs and / or national system (eg Planning Gain Supplement); the creation of a Regional Infrastructure Fund.
- Role of the Implementation Plan and its investment frameworks

- **Implementation Plan**

In terms of the status of the Implementation Plan (IP), the Panel's view is that this is less important than its role and content. It sees it as an evolving document that is regularly updated and that this would more readily be achieved by retaining it as a separate document from the RSS. This could be done as part of the annual monitoring process.

It therefore recommends that:

- The IP should be kept under review as a non-statutory region-wide document giving a comprehensive picture of strategic infrastructure requirements.
- The main infrastructure priorities at regional and sub-regional level should be included in the RSS text.
- The definition of infrastructure given in the IP should be included in the supporting text to Policy CC5.

In terms of content, the Panel feels that the IP is generally pitched at the right level and goes beyond the requirements of PPS11.

Chapter 28 - Monitoring and Review

- **Monitoring Framework**

The Panel agrees with the Assembly that the monitoring framework should become a separate supporting document so it can be easily updated but recommends the inclusion of the monitoring process in a new final section covering Implementation, Monitoring and Review. It considers the Assembly's approach to monitoring to be sound and find the traffic light system used useful.

A short-term priority is to flesh out the proposed system for monitoring the delivery of the sub-regional strategies. The Panel recognises that from the debates it was clear that some sub-regions were more advanced than others about practicalities of monitoring. The Panel recommends using the AMR produced by the MKSM Growth Area as a good role model.

The Panel supports the Assembly's desire to focus on interpretation rather than collection of data. This should be assisted by a greater coordination of collection methods and data sharing with relevant bodies. However, the Panel accepts there is shortage of resources in local authorities and hence the burden on them should be minimised.

The Panel confirms that the list of indicators includes the core national indicators except the indicator in relation to regional parking standards.

GOSE indicated that several topics need to be revised to indicate Government guidance (PPS1 Supplement, PPS3 and transport).

Many additional indicators were suggested in participants' statements; however, the Panel endorses the need to avoid a plethora of additional indicators. It recommends that criteria that might be used to differentiate between these are the extent to which the RSS has a significant impact in influencing that matter and the extent to which the Assembly or planning authorities can institute some form of management action if deemed necessary by the monitoring result.

The Panel recommends that the most immediate improvements to the monitoring framework should come from:

- Adding further targets.
 - Identifying indicators relevant to behaviour change.
 - Identifying the components that will need to be monitored to assess progress in achieving smart growth.
 - Indicating how the impact of development on Thames Basin Heaths will be monitored.
- **Plan, Monitor, Manage (PMM)**

The Panel concludes that Policy H2 should be deleted as, although it was ahead of its time when written, it has been overtaken by the requirements of PPS3. However,

the Panel agrees that the role of the Assembly in the 'manage' process should be made clearer and this should include:

- An advisory role to local authorities.
- Assistance in helping to remove blockages to housing delivery on major sites.
- Interpreting the results from individual local authorities' trajectories for the overall delivery of housing at the regional and sub-regional scales for inclusion in the AMR.
- Setting out the actions to be undertaken at regional level where actual performance does not reflect the regional housing trajectories.

The Panel considers that an elaboration of actions that need to be taken in response to plan monitoring should be included in the final section of the Plan.

The Panel supports the Assembly's suggestion of an annual Action Plan which will follow the publication of the AMR.

- **Scope and Timing of Subsequent Reviews**

The Panel proposes that any partial reviews of this RSS identified so far should be listed in this final section.

The Panel recommends that the final section should indicate that unless there are unexpected external circumstances or monitoring trends that the next full review of key policies should be in about five years in order to maintain adequate forward guidance for LDFs.

The Panel recommends that the final section should also indicate that the Implementation Plan will be kept up-to-date as a supporting document to indicate how this RSS is to be delivered and will be reviewed as a result of any partial reviews.

Chapter 29 - Format of RSS

The Panel's main suggestions for improving the structure of the Plan are:

- Providing greater focus in the early parts, including a dedicated section on the spatial strategy.
- A new section in Part E for the 'rest of county' areas.
- A new final chapter on Implementation, Monitoring and Review.

The Panel recommends re-balancing the regional and sub-regional parts of the Plan as this risks confusing the Plan's main messages. It suggests this is done by:

- Slimming down the sub-regional policy content to its essentials.
- Transferring into regional sections any sub-regional policy which has been shown to have wider applicability.

Annex 1: Recommended Housing Provision by Sub-region and 'Rest of County' Area

Sub-regions	Draft SE Plan Av/annum 2006-2026	Draft SE Plan Total 2006-2026	Panel Report Av/annum 2006-2026	Panel Report Av/annum 2006-2026	Panel Report Total 2006- 2026
South Hampshire	4,000	80,000	0	4,000	80,000
Sussex Coast	2,700	54,000	270	2,970	59,400
East Kent and Ashford	2,400	48,000	250	2,650	53,000
Kent Thames Gateway	2,400	48,000	50	2,450	49,000
London Fringe	1,868	37,360	438	2,306	46,120
Western Corridor Blackwater Valley	4,476	89,520	904	5,380	107,600
Milton Keynes and Aylesbury Vale	3,500	70,000	190	3,690	73,800
Central Oxfordshire	1,700	34,000	305	2,005	40,100
Gatwick	1,650	33,000	75	1,725	34,500
Sub-region total	24,694	493,880	2,482	27,176	543,520
Isle of Wight	520	10,400	0	520	10,400
Rest of Hampshire	800	16,000	245	1,045	20,900
Rest of West Sussex	300	6,000	30	330	6,600
Rest of east Sussex	300	6,000	30	330	6,600
Rest of Kent	1,200	24,000	194	1,394	27,880
Rest of Surrey	230	4,600	20	250	5,000
Rest of Berkshire	50	1,000	0	50	1,000
Rest of Oxfordshire	660	13,200	65	725	14,500
Rest of Buckinghamshire	150	3,000	35	185	3,700
Rest of total	4,210	84,200	619	4,829	96,580
South East	28,904	578,080	3,101	32,005	640,100

Annex 2: Recommended Housing provision by District, Unitary and County

	Draft SE Plan Av/annum 2006-2026	Draft SE Plan Total 2006-2026	Panel Recommended Change dpa	Panel Report Av/annum 2006-2026	Panel Report Total 2006- 2026
Bracknell Forest	539	10,780	100	639	12,780
Reading	521	10,420	90	611	12,220
Slough	235	4,700	50	285	5,700
West Berkshire	525	10,500	375	900	18,000
Windsor and Maidenhead	281	5,620	65	346	6,920
Wokingham	523	10,460	100	623	12,460
Berkshire	2,624	52,480	780	3,404	68,080
Aylesbury Vale	1,060	21,200	285	1,345	26,900
Chiltern	120	2,400	25	145	2,900
Milton Keynes	2,440	48,800	-92	2,348	46,960
South Bucks	90	1,800	4	94	1,880
Wycombe	330	6,600	60	390	7,800
Buckinghamshire	4,040	80,800	282	4,322	86,440
Brighton and Hove	550	11,000	20	570	11,400
Eastbourne	240	4,800	0	240	4,800
Hastings	210	4,200	0	210	4,200
Lewes	220	4,400	0	220	4,400
Rother	280	5,600	0	280	5,600
Wealden	400	8,000	80	480	9,600
East Sussex	1,900	38,000	100	2,000	40,000
Basingstoke and Deane	825	16,500	70	895	17,900
East Hampshire	260	5,200	125	385	7,700
Eastleigh	354	7,083	0	354	7,080
Hedge End SDA	300	6,000	0	300	6,000
Fareham	186	3,729	0	186	3,720
Fareham SDA	500	10,000	0	500	10,000
Gosport	125	2,500	0	125	2,500
Hart	200	4,000	0	200	4,000
Havant	315	6,301	0	315	6,301
New Forest	207	4,138	0	207	4,140
Portsmouth City	735	14,700	0	735	14,700
Rushmoor	310	6,200	0	310	6,200
Southampton	815	16,300	0	815	16,300
Test Valley	446	8,910	30	476	9,520
Winchester	522	10,439	90	612	12,240
Hampshire	6,100	122,000	315	6,415	128,300
Isle of Wight	520	10,400	0	520	10,400

Ashford	1,135	22,700	0	1,135	22,700
Canterbury	360	7,200	100	460	9,200
Dartford	785	15,700	0	785	15,700
Dover	305	6,100	100	405	8,100
Gravesham	465	9,300	0	465	9,300
Maidstone	410	8,200	94	504	10,080
Medway	815	16,300	0	815	16,300
Sevenoaks	155	3,100	10	165	3,300
Shepway	255	5,100	0	255	5,100
Swale	415	8,300	50	465	9,300
Thanet	325	6,500	50	375	7,500
Tonbridge and Malling	425	8,500	25	450	9,000
Tunbridge Wells	250	5,000	50	300	6,000
Kent	6,100	122,000	479	6,579	131,580
Cherwell	590	11,800	50	640	12,800
Oxford City	350	7,000	50	400	8,000
<i>Oxford SDA</i>	-	-	200	200	4,000
South Oxfordshire	510	10,200	37	547	10,940
Vale of the White Horse	575	11,500	3	578	11,560
West Oxfordshire	335	6,700	30	365	7,300
Oxfordshire	2,360	47,200	370	2,730	54,600
Elmbridge	231	4,620	25	256	5,120
Epsom and Ewell	181	3,620	18	199	3,980
Guildford	322	6,440	100	422	8,440
Mole Valley	171	3,420	17	188	3,760
Reigate and Banstead	387	7,740	75	462	9,240
Runnymede	146	2,920	140	286	5,720
Spelthorne	151	3,020	15	166	3,320
Surrey Heath	187	3,740	0	187	3,740
Tandridge	112	2,240	13	125	2,500
Waverley	230	4,600	20	250	5,000
Woking	242	4,840	50	292	5,840
Surrey	2,360	47,200	473	2,833	56,660
Adur	130	2,600	50	180	3,600
Arun	465	9,300	100	565	11,300
Chichester	430	8,600	50	480	9,600
Crawley	350	7,000	25	375	7,500
Horsham	620	12,400	30	650	13,000
Mid Sussex	705	14,100	50	755	15,100
Worthing	200	4,000	0	200	4,000
West Sussex	2,900	58,000	305	3,205	64,100
South East	28,904	578,080	3,104	32,008	640,160