



Department for  
Communities and  
Local Government

# Strategic Environmental Assessment of the Revocation of the South East Regional Strategy

Post Adoption Statement

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Any enquiries regarding this document/publication should be sent to us at:

Department for Communities and Local Government  
Eland House  
Bressenden Place  
London  
SW1E 5DU  
Telephone: 030 3444 0000

February, 2013

ISBN: 978-1-4098-3808-1

# Summary of Key Facts

<b>Name of Responsible authority:</b>	Department for Communities and Local Government
<b>The adopted Plan:</b>	The revocation of the Regional Strategy for the South East of England (modified to retain Policy NRM6: Thames Basin Heaths Special Protection Area from the South East Plan)
<b>Date of revocation:</b>	<b>25 March 2013</b>
<b>Address where documents can be consulted:</b>	Eland House Bressenden Place London SW1E 5DU

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# Preface

This document is the Post Adoption Statement for the plan to revoke the Regional Strategy for the South East of England (“the Plan to Revoke”). The Post Adoption Statement is a requirement<sup>1</sup> of the Strategic Environmental Assessment process to which the Plan to Revoke the Regional Strategy has been subject. Strategic Environmental Assessment is an assessment process that supports decision making by identifying, characterising and evaluating the likely significant effects of a plan or programme on the environment and determining how any adverse effects may be mitigated or where any beneficial effects may be enhanced.

The Regional Strategy for the South East comprises the regional spatial strategy for the region (The South East Plan Regional Spatial Strategy for the South East of England published by the Secretary of State in May 2009,<sup>2</sup> together with the Part A Statement of the March 2005 Milton Keynes & South Midlands Sub-Regional Strategy) and the regional economic strategy for the region (published by South East England Development Agency in 2006).

The Post Adoption Statement sets out information about the plan as adopted, which is the Plan to Revoke the Regional Strategy for the South East with modifications to retain The South East Plan policy NRM6: Thames Basin Heaths Special Protection Area (“the Thames Basin Heaths policy”).

The Post Adoption Statement is being published in parallel with the laying of The Regional Strategy for the South East (Partial Revocation) Order 2013 (S.I. 2013/427), which will come into force on 25 March 2013.<sup>3</sup>

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<sup>1</sup> Article 9 of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and Part 4 (regulation 16) of The Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633).

<sup>2</sup> Following legal challenges to The South East Plan, bullet point (i) of policy H2 was deleted and policies SP5, H1, LF3 and LF5 were ordered to be treated as not having been approved or adopted to the extent that they specify a particular housing requirement for Guildford Borough or require a selective review of the Green Belt boundaries of Guildford Borough.

<sup>3</sup> The Order also revokes all directions preserving policies contained in saved structure plans in the region, except for policy H2 (Upper Heyford) of the Oxfordshire Structure Plan 2016.

# Chapter 1

## Introduction

### 1.1 Regional Strategies

The policy to abolish regional strategies fits into the Government's overall public commitment to deliver a fundamental shift of power from Westminster. For planning, this has meant radically reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live. The policy to revoke regional strategies is a key element of the Government's decentralisation agenda.

The Coalition Agreement makes clear the Government's priority to promote decentralisation and democratic engagement and to end the era of top-down government by giving new powers to local councils, communities, neighbourhoods and individuals. Regional strategies imposed development upon local communities; the Government wants to return decision-making powers on housing and planning to local councils.

Currently, the South East Regional Strategy provides the statutory regional framework for development and investment across the region, including setting targets for housing delivery that apply to constituent local councils.

Since their creation by the Planning and Compulsory Purchase Act 2004, regional strategies, sitting alongside local plans prepared by local authorities, form the statutory development plan for an area. This means that the South East Regional Strategy sets the framework for local plan-making and local councils in the region must ensure that their local plan is in general conformity with the Strategy at the time their local plan is submitted for examination. It also means that planning applications should be determined in accordance with the development plan (which includes the relevant regional strategy in the local planning authority's region) unless material considerations indicate otherwise.

In order to localise the planning system, section 109 of the Localism Act provides for the abolition of the regional planning tier as a two-stage process. The first stage, to remove the framework of regional planning, took effect when the Act received Royal Assent on 15 November 2011. This prevents further regional strategies from being created or revised. Section 109 also removed the responsible regional authorities. The second stage is the proposal to abolish each of the existing regional strategies outside London by secondary legislation, subject to the outcomes of the environmental assessment process.

The revocation of the South East Regional Strategy would leave a more localist planning system comprising of local and where adopted neighbourhood plans and give local councils responsibility for strategic planning. It makes the local plan the keystone of the planning system, becoming the vehicle for strategic planning and the framework for neighbourhood plans.

On revocation of the South East Regional Strategy (and any saved structure plan policies), the statutory development plan would comprise any saved structure plan and local plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act.

In developing local plans, local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State:

- The **National Planning Policy Framework** was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment.
- The **planning policy for traveller sites** which was published in March 2012.
- The **planning policy statement 10: Planning for Sustainable Waste Management (PPS10)** until it is replaced with the national waste planning policy, to be published as part of the National Waste Management Plan for England.

In addition, local councils will need to comply with existing national and European legislation in preparing their plans. Importantly, councils also need to comply with the duty to co-operate introduced in section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by the Localism Act 2011) in order for their plan to be found sound at examination.

## 1.2 The Plan to Revoke the South East Regional Strategy

The South East Regional Strategy combines the regional spatial strategy for the region and the regional economic strategy for the region.

The regional spatial strategy (which comprises the The South East Plan Regional Spatial Strategy for the South East of England published by the Secretary of State in May 2009, together with the Part A Statement of the March 2005 Milton Keynes & South Midlands Sub-Regional Strategy) was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the region for 15 to 20 years. It requires local planning authorities to provide at least 654,000 net additional dwellings over the period 2006 to 2026. It includes policies to address housing, environmental protection and management, transport and other infrastructure, economic development, minerals, energy and waste, as well as sub-regional policies. The South East Plan seeks to accommodate higher levels of growth in sustainable ways by coordinating planning policy in nine sub-regions, and focussing development on a network of regional hubs, which would include development in five strategic development areas, and mixed use development in urban areas.

The regional economic strategy, published in October 2006 was produced in compliance with the Section 7 of the Regional Development Agencies Act 1998. It provides a vision for the South East economy to 2016 that the South East will be a world class region achieving sustainable prosperity. It sets three headline and interlinked objectives for the strategy (with targets): achieving Global Competitiveness; Smart Growth and spreading the benefits of competitiveness; and Sustainable Prosperity, ensuring that competitiveness is consistent with the principles of sustainable development. The regional economic strategy also sets eight transformational actions intended to have particular impact across the breadth of the strategy ranging from broadband coverage to environmental technologies.

Revocation of the South East Regional Strategy would leave the statutory development plan as comprising of any saved structure plan and local plan policies and adopted development plan documents. Half of the 69 local planning authorities in the South East<sup>4</sup> have adopted development plan documents under the Planning and Compulsory Purchase Act 2004. The remaining 34 local planning authorities in the South East, who were yet to adopt a development plan document under the Planning and Compulsory Purchase Act 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990. These authorities are more likely to be affected by the revocation of the Regional Strategy.

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<sup>4</sup> Including the New Forest National Park Authority and the South Downs National Park Authority which began operating on 1 April 2011



Once the regional strategy is revoked, local councils should, in line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, and in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, approve development that accords with the local plan unless material considerations indicate otherwise. Where that plan is out of date, councils must, unless material considerations indicate otherwise, grant planning permission for development that is sustainable without delay. Out of date local plans will leave councils vulnerable to speculative development; the Government is encouraging local councils to put in place local plans as soon as possible.

In the absence of the South East Regional Strategy, strategic and cross authority working will be driven by local councils who must now show the leadership required to work across boundaries to plan for strategic matters. The new duty to co-operate requires local councils and other public bodies to work together actively constructively and on an ongoing basis when planning for strategic matters in local and marine plans. This might involve both formal arrangements, such as joint plan-making or joint working partnerships, and less formal processes of close and ongoing dialogue to work through planning for strategic matters.

In the South East region, there are already good examples of joint working through a variety of legislative and non statutory means.

- The **Partnership for Urban South Hampshire** was originally established to support and promote economic-led growth in the South Hampshire area. It has in place a strong governance structure to manage a wide range of strategic planning and economic issues and has been responsible for a significant amount of joint evidence to support Local Plan-making. The spatial strategy is currently being updated to take account of a revised economic strategy and to manage a shortfall in housing provision.
- Two **Nature Improvement Areas**, partnerships of local authorities, local communities and landowners, the private sector and conservation organisations, are located in the South East - the South Downs and the Greater Thames Marshes (Kent).
- The **Kent Climate Local** initiative has brought together local authorities through the Kent Forum. These authorities have signed up to setting commitments and to tackle climate change. The Kent partnership are working towards a cut in emissions of 2.6% annually in Kent by 2020 by encouraging renewable energy installations to increase energy from renewable sources by 10% by 2020, retrofitting homes across Kent, beginning with 1,000 households in 2013 through the Kent and Medway Green Deal Partnership, working with at least 500 local companies by 2015 to help them cut their energy, waste and water bills, supporting an increase in jobs within the Low Carbon sector by 10% by 2020

In addition, there are non-statutory Local Enterprise Partnerships (of which there are eight in the region covering Kent, East Sussex, West Sussex, Hampshire, Isle of Wight, Surrey, Oxfordshire, Berkshire, Buckinghamshire and Bedfordshire). This combination of measures aims to ensure that strategic planning operates effectively in the absence of the Regional Strategies.

### 1.3 Applying Strategic Environmental Assessment to the Revocation of the Regional Strategies

The Plan for the purposes of the Strategic Environmental Assessment is the Plan is to Revoke the South East Regional Strategy and to leave in place a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth. The Plan to Revoke is set out in more detail in Section 2 of the Environmental Report published in October 2012.

As part of its stated commitment to protecting the environment, the Government initially carried out environmental assessments of the revocation of the Regional Strategies. These initial assessments were undertaken to be compliant with the procedure set out in the Strategic Environmental Assessment Directive (2001/42/EC). A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework and a planning policy on Travellers sites, and has commenced the duty to co-operate provided for in the Localism Act. In addition, in a judgement by the Court of Justice of the European Union<sup>5</sup>, the Court held that 'in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment'. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent case law, to update and build on the assessments which were described in the previous Environmental Reports.

AMEC Environment and Infrastructure Ltd were commissioned to carry out the further assessment and to prepare updated Environmental Reports. A public consultation exercise undertaken on the updated Environmental Report for the South East ran from 11 October 2012 until 6 December 2012. Updating of, and consultation on, the Environmental Reports for the other

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<sup>5</sup> The judgment in Case C-567/10 Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale.

seven regions has been staggered. The South East Regional Strategy is the third of the eight to have completed consultation on the Environmental Report. This has enabled the Secretary of State to understand the environmental effects of revoking the regional strategy and to consider the views of the statutory bodies and the public who responded to two public consultations.

In accordance with Article 8 of the Strategic Environmental Assessment Directive, the Government has taken into account findings of the two Environmental Reports (on the revocation of the Regional Strategy and the reasonable alternatives assessed as part of that process) and the consultation responses to those reports in coming to its decision to revoke the Regional Strategy.

## 1.4 Purpose of the Post Adoption Statement

Article 9 of the Strategic Environmental Assessment Directive requires that when a plan or programme is adopted (in this case, the Plan to Revoke the Regional Strategy modified to retain the Thames Basin Heaths policy as set out in Chapter 5), the consultation bodies, the public and any other Member States consulted on the Environmental Report are informed and the following specific information is made available:

- the plan as adopted;
- a statement summarising:
  - (i) how environmental considerations have been integrated into the Plan to Revoke the South East Regional Strategy;
  - (ii) how the Environmental Report has been taken into account;
  - (iii) how opinions expressed in response to the consultation on the Environmental Report have been taken into account;
  - (iv) the reasons for choosing the Plan to Revoke the South East Regional Strategy, as adopted, in the light of the other reasonable alternatives dealt with; and
  - (v) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the South East Regional Strategy.

The purpose of this Post Adoption Statement is to provide the specific information outlined under each of the points listed (i) to (v) above and which is presented in the following sections of this statement.

# Chapter 2

## How environmental considerations have been integrated into the plan

### 2.1 Environmental Considerations in the Plan to Revoke the South East Regional Strategy

Environmental considerations have been integral to the Plan to Revoke the South East Regional Strategy. Policy changes developed alongside the Plan to Revoke provide protections in the context of revocation. For example, within the National Planning Policy Framework, sustainable development is described as a 'golden thread' running through both plan making and decision making. The National Planning Policy Framework makes clear that the planning system should contribute to and enhance the natural environment, including by protecting and enhancing valued landscapes, minimising impacts on biodiversity and providing net gains in biodiversity where possible. The Framework underlines that pursuing sustainable development means moving from a net loss of biodiversity to achieving net gains for nature.

During its development, the National Planning Policy Framework was also subject to consultation, with many of the responses focusing on aspects of environmental protection and enhancement.

Environmental considerations are also key to other ongoing regional planning processes identified in the region. For example, water companies and their respective Water Resource Management Plans which set out how future demand for water resources will be met. Similarly, River Basin Management Plans for the region identify the pressures that the water environment faces and include action plans requiring cross boundary co-operation and input from a range of organisations. The duty to co-operate came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters.

The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues.

## 2.2 Environmental Considerations in the Strategic Environmental Assessment

To provide the context for the assessment, and in compliance with the Strategic Environmental Assessment Directive, the relevant aspects of the current state of the environment and its evolution without the Plan to Revoke were considered, along with the environmental characteristics likely to be significantly affected. Key environmental considerations identified from this process and presented in the updated Environmental Report included:

- **Pressure on biodiversity interest** in the South East from development, disturbance and changing agricultural practice. South East biodiversity is centred on both inland and coastal regions with particularly significant areas of lowland heathland, chalk grassland, ancient woodland, vegetated shingle and sheltered estuaries. The South East hosts 58 Special Areas of Conservation, 21 Special Protection Areas and 16 Ramsar sites. Sites of Special Scientific Interest cover around 134,000 hectares (around 7%) of the region.
- **Issues associated with population increase:** The population of the South East grew by 5% to over 8.5 million people, which represents 16% of the English total. The most densely populated areas are Slough, Oxford, Reading, the South Hampshire coast, Sussex coast and Medway. It is forecast that the population will grow by 16% between 2010 and 2030 and the number of households will grow to 4.1 million by 2033. Population growth will be accompanied by changing age-structure and the age group expected to grow most in size is expected to be persons aged 65 or over. Housing completions have failed to keep pace with housing demand. Housing affordability ratios in almost all districts exceed the England average.
- **Pressure on land:** Sixty percent of the total land area in the region is categorised as farmland. Approximately 80% is classified as Grade 3 land, 10% is Grade 1 or 2, and the remaining 10% is Grade 4 or 5.
- **Imbalance between water demand and supply:** There is considerable existing pressure on water resources in the region related to development needs with some existing areas already exceeding sustainable abstraction limits. This is likely to continue with an increased water resource demand of up to 440 Ml/d by 2035 forecast.
- **Air quality, especially on main transport routes:** Overall air quality in the South East has improved over the past decade following a decline in heavy industry within the region. However, within the South East there are 69 local planning authorities out of which 46 have declared one or more Air Quality Management Areas, with road traffic being the principal source of pollutants.

- **Flooding and climate change:** Over 403,000 properties (domestic and commercial) are at risk from flooding, either from river or sea. Hotter and drier summers and warmer and wetter winters are forecast (based on predictions for the effects of climate changes in the 2080's for the region).
- **Waste:** The South East sends more waste to landfill than any other region (11.6 million tonnes in 2008). Of the total, 5.3 million tonnes was construction, demolition and excavation waste, 37% (4.3 million tonnes) was commercial and industrial and 16% (2 million tonnes) was classified as municipal. Less than 1% (65,000 tonnes) of waste going to landfill in the South East was hazardous. Between 2000/01 and 2008/09 the proportion of total household waste that was recycled more than doubled, from 16.4% to 38.4%. Whilst significant progress has been made, further steps are needed to meet the targets contained in the Landfill Directive (99/31/EC) to reduce the amount of biodegradable municipal waste (BMW) that is sent to landfill to 35% of the 1995 value by 2020.
- **Pressure on historic assets:** The region is home to 75,013 listed buildings (20% of the England total) of which 1,730 are listed Grade I and 3,858 listed Grade II\* buildings. In 2007, 3.1% of Grade I and II\* buildings were deemed at risk. The South East is extensively wooded and contains 40% of the total ancient woodland in England, an important cultural asset. Major development, bypasses and insensitive developments have resulted in a loss of historical assets.
- **Pressures on landscape character** from intensive land use and increasing pressure from growth and development. More than 36% of the South East region is protected by national designations. The New Forest National Park and the South Downs National Park together cover approximately 10% of the region. There are eleven Areas of Outstanding Beauty, more than any other region in England.

These factors were then reflected in the range of topics that were considered in detail by the Strategic Environmental Assessment, as outlined in **Table 2.1**.

**Table 2.1 Environmental topics which were considered in the Strategic Environmental Assessment**

**Topics included in the Strategic Environmental Assessment of the revocation of regional strategies**

Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)

Population (including socio-economic effects and accessibility)

## Topics included in the Strategic Environmental Assessment of the revocation of regional strategies

Human Health

Soil and Geology (including land use, important geological sites, and the contamination of soils)

Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)

Air Quality

Climate Change (including greenhouse gas emissions, predicted effects of climate change such as flooding and the ability to adapt)

Material Assets (including waste management and minerals)

Cultural Heritage (including architectural and archaeological heritage)

Landscape and Townscape

All the environmental topics listed in the Strategic Environmental Assessment Directive and Regulations were found to be relevant for the assessment of the revocation plan.

In line with the requirements of the Directive and Regulations and the guidance in the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the Strategic Environmental Assessment Directive, the assessment process predicted the significant environmental effects of the Plan to Revoke the South East Regional Strategy against all of the topic areas listed in **Table 2.1**. This was done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information was not available, the assessment was based on professional judgement and with reference to relevant legislation, regulations and policy.

Where it was identified that revocation of a Regional Strategy policy would have an effect on the environment and that this would have a consequence for Local Plan policies and/or local areas, the assessment examined those effects in more detail. Comparisons were made between the policies in the South East Plan on housing allocations, allocations of pitches for gypsies, travellers and travelling showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment and policies on the green belt and the heritage environment with the equivalent policies in local plans and /or core strategies in the region. This

analysis was set out in Appendix C of the updated Environmental Report and was reflected, where relevant in the assessment of individual plan policies in Appendix D of the updated Environmental Report.

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted for a period of five weeks on the scope and level of detail to be included in the Environmental Reports in May 2011. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries.

Both Environmental Reports (issued in October 2011 and in October 2012) documented the findings of the assessment, outlining where any likely significant effects were identified and proposing where appropriate mitigation measures. These findings have then been taken into account during the preparation of the Plan to Revoke and before the final decision was taken to adopt the Plan, with modifications to retain the Thames Basin Heaths policy.



# Chapter 3

## How the Environmental Reports have been taken into account

The Environmental Reports and Plan to Revoke the South East Regional Strategy have developed in tandem. **Table 3.1** details key stages of the Strategic Environmental Assessment and its relationship with the development of the Plan to Revoke the Regional Strategy.

**Table 3.1 Key stages in the development of the Environmental Report and its relationship with the Plan to Revoke the Regional Strategy**

Strategic Environmental Assessment	Plan to Revoke	Relationship
<b>Scoping</b>		
The scoping stage of the Strategic Environmental Assessment identified other relevant plans, programmes and environmental protection objectives which could be affected by, or which could affect the Plan to Revoke the Regional Strategy.	The development of the National Planning Policy Framework and its adoption in March 2012 removed the need to reference the planning policy statements (listed in Annex 3 of the National Planning Policy Framework, 'Documents replaced by this Framework').	The links between the other relevant plans, programmes, policies and strategies that were applicable to the Plan to Revoke were outlined. These included plans and programmes at an international, European or national level covering a variety of topics (including spatial and resource planning).
<b>Assessment</b>		
Initial assessment of the impact of revocation of the regional strategies undertaken before the National Planning Policy Framework was	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the	Assumptions that underpin the National Planning Policy Framework are clarified in the updated assessment,

<b>Strategic Environmental Assessment</b>	<b>Plan to Revoke</b>	<b>Relationship</b>
adopted resulting in assumptions over the final contents of the National Planning Policy Framework and its influence.	Environmental Report takes account of the policies set out in the Framework.	documented in the updated Environmental Report (published in October 2012).
Initial assessment of the impact of the duty to co-operate took place prior to the commencement of the new duty and required outline of assumptions with regard to operation.	The provisions which create a new duty to co-operate were commenced when the Localism Act received Royal Assent on the 15th November 2011. They require local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.	Commencement of the duty to co-operate provided greater certainty to the assessment, reflected in updated assessment, documented in the updated Environmental Report (published in October 2012).
Assessment considered the effects of revocation on local planning authorities and provided analysis of local plans highlighting where plans were out of date or silent on key planning policy matters.	The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'.	The Strategic Environmental Assessment provided up to date summary of current position on the adoption and status of local plans, with indication of the number of authorities who needed to take action within each region regarding the revision and update of local plan policies.

### Reporting

The key findings of the Environmental Report are presented along with the Government's responses in Table 3.2 below. The extent to which the findings have informed the final plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) is detailed in Chapter 5 of this Post Adoption Statement.

### Consultation

Strategic Environmental Assessment	Plan to Revoke	Relationship
<p>The consultation responses to the consultation on the initial and updated Environmental Reports are presented along with the Government's responses in Tables 4.1 and 4.2 in Chapter 4 of this Post Adoption Statement. The extent to which the consultation has informed the final plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) is detailed in Chapter 5 of this Post Adoption Statement.</p>		
<p><b>Monitoring</b></p>		
<p>Proposals for monitoring</p>	<p>Section 5 'Put Communities in charge of planning' of the Department for Communities and Local Government business plan 2012 – 2015 includes specific monitoring actions for the Department regarding the local plan making progress by authorities and on compliance with the duty to co-operate.</p>	<p>The Department for Communities and Local Government is able to jointly meet requirements for monitoring environmental effects of the implementation of the Plan to Revoke with business plan commitments and by undertaking periodic review of data for specific monitoring information.</p>

Key findings of the updated Environmental Report are summarised in **Table 3.2** together with the Government response and how these have been taken into account in the Plan to Revoke.

**Table 3.2 Key findings of the Environmental Report**

No	Key Environmental Report findings	Response
<p>1.</p>	<p>There will be significant positive environmental effects from the revocation of the South East Regional Strategy, although these will be largely similar to those if the Regional Strategy</p>	<p>The Government notes the findings of the updated Environmental Report and considers that the Plan to Revoke is largely positive in its effect although it is acknowledged that these are largely similar to those of retention.</p>

No	Key Environmental Report findings	Response
	were retained.	
2.	<p>The areas where revocation of the South East Regional Strategy would lead to significant negative effects are in relation to water resources, material assets, climate change and air quality arising from development associated with policies for housing, employment provision and airport development.</p>	<p>The Government notes these effects and that they are similar to those for retention.</p> <p>The Government considers that these potentially negative impacts on the environment can be positively addressed by authorities, including local planning authorities, working collaboratively through the duty to co-operate within the policy context set by the National Planning Policy Framework.</p> <p>It notes the finding in the updated Environmental Report that a locally-led approach could ensure that the adverse effects are more effectively mitigated, possibly through a more detailed understanding of local environmental capacity issues and more diverse and locally-specific spatial distributions of development.</p> <p>It agrees that the measures presented to mitigate the effects, which concern statutory actions by water companies (such as requirements under Section 37A of the Water Industry Act 1991 to prepare and maintain water resource management plans), the Environment Agency and local authorities (under the duty to co-operate) will be effective in the sustainable water resource management for the region.</p> <p>The National Planning Policy Framework sets out a set of core land use planning principles which should underpin both plan-making and decision-taking – including that planning should: support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the re-use of existing resources, including the conversion of existing buildings, and encourage the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the</p>

No	Key Environmental Report findings	Response
		<p>statutory duty to co-operate. The Framework says local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. To support the move to a low carbon future, the Framework asks local planning authorities to plan for new development in locations and ways which reduce greenhouse gas emissions, and support energy efficiency improvements to existing buildings and to set any local requirements for a building's sustainability in a way consistent with the Government's zero carbon buildings policy, and to adopt nationally described standards. The Framework includes requirements for local authorities to have a positive strategy to promote energy from renewable sources; and design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily. The duty to co-operate requires local authorities to co-operate to deliver strategic outcomes which includes mitigating climate change. The National Planning Policy Framework's proactive, plan-led approach sits within a wider set of requirements to mitigate and adapt to climate change. There is a specific duty on Local Planning Authorities to ensure their local plan includes policies designed to mitigate climate change, and there is the UK's legally binding target that by 2020 15% of energy should come from renewable energy.</p> <p>Additionally, there are a wider set of policies and strategies to mitigate and adapt to climate change, such as the Government's energy efficiency strategy published in November 2012, the Green Deal, launched in October 2012, which helps people pay for energy efficiency improvements to their homes, and the Climate Local Initiative launched by the Local Government Association in June 2012. Under this initiative local authorities have made</p>

No	Key Environmental Report findings	Response
		<p>commitments to tackling climate change. The Kent partnership for example are working towards a cut in emissions of 2.6% annually in Kent by 2020 by:</p> <ul style="list-style-type: none"> <li>• Encouraging renewable energy installations to increase energy from renewable sources by 10% by 2020.</li> <li>• Retrofitting homes across Kent, beginning with 1,000 households in 2013, through the Kent and Medway Green Deal Partnership.</li> <li>• Working with at least 500 local companies by 2015 to help them cut their energy, waste and water bills.</li> <li>• Supporting an increase in jobs within the Low Carbon sector by 10% by 2020.</li> </ul> <p>Actions to build local resilience include increasing flooding resilience in 4,500 Kent homes, bringing in £5.6m in partnership funding for flood measures and supporting activity to reduce water consumption in Kent from 160 litres to 140 litres per person per day by 2016.</p> <p>The Gatwick Diamond business-led partnership has helped authorities to manage cross-boundary planning priorities, which are being taken forward through a Local Strategic Statement and using tools like a Memorandum of Understanding. It is also part of the wider Coast to Capital Local Enterprise Partnership and links are beginning to be made between the Gatwick Diamond partnership and the Local Enterprise Partnership. Their Water Cycle Study has enabled the authorities involved to establish a shared evidence base on the water environment that can inform emerging planning documents and in turn their decisions on location and timing of strategic development allocations. The study has allowed phased delivery of development to take account of the need to provide new or upgraded infrastructure in line with water company planning processes. It has helped each council and its partners consider the</p>

No	Key Environmental Report findings	Response
		<p>collective and cumulative impacts of development at catchment scale. This was made possible through the cross-boundary approach adopted which has given each council an understanding of their neighbours' goals and those of the water companies and Environment Agency.</p> <p>Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them and there will be a continuing need for continued primary extraction of resource. The National Planning Policy Framework makes it clear that Mineral Planning Authorities should take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials. Mineral Planning Authorities currently work together, including through the Aggregate Working Party and with other authorities outside the region, to help deliver this objective</p> <p>The Government notes that the updated Environmental Report finds that the cumulative effects of revocation do not affect the current trend in air quality or localised effects. Within the South East there are 69 local planning authorities, out of which 46 have declared one or more Air Quality Management Areas. The main risk to air quality is traffic congestion. Government has put in place policies to reduce air pollution in the National Planning Policy Framework, for example, that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The National Planning Policy Framework also expects any proposal for development in Air Quality Management</p>

No	Key Environmental Report findings	Response
		<p>Areas to be consistent with local authority measures to improve air quality standards.</p> <p>The Government notes the finding of the updated Environmental Report that revocation of the South East Regional Strategy will not remove the demands for airport development, and the national policy will remain as set out in the 2003 Aviation White Paper until superseded. Any applications for airports which meet the thresholds in the Planning Act 2008 will be determined by the Secretary of State for Transport. Until a National Policy Statement is in place any such applications will be determined having regard to any Local Impact Report, any prescribed matters and any other matters the Secretary of State considers are both important and relevant. This will include matters such as air quality impacts. The Government's draft Aviation Policy Framework makes clear that "air quality is a material consideration for local planning decisions and aviation policy needs to be consistent both with air quality legislation and local authority action plans and strategies for reducing air pollution. Surface transport impacts need to be included in this consideration. Air quality was raised as a concern by some respondents and we need to ensure that our policy affords appropriate health protection and is consistent with meeting our European legal obligations".</p>
3.	<p>For revocation, there may be more uncertainty about the nature and scale of positive and negative impacts on the Strategic Environmental Assessment topics in the short and medium term due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect</p>	<p>The Government notes the findings of the updated Environmental Report. In noting the findings of the Environmental Report, the Government considers any uncertainty of impacts until plans are in place are mitigated by measures outside the Plan to Revoke</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in</p>



No	Key Environmental Report findings	Response
	<p>the objectively assessed and up to date needs of their respective local communities</p>	<p>respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption in favour of sustainable development is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will cease to apply. From March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p> <p>Government notes the findings of the Environmental Report on progress of plan-making in the South East of England. Delivery of plans is increasing: across the South East of England region 12 councils have adopted Local Plans since May 2011, compared with 23 councils that had adopted local plans over the previous 7 years. 51% of councils have a plan adopted post-2004. And overall 74% of councils now have a published plan.</p> <p>There is a package of advice and support being offered to all councils, from the Local Government Association (LGA), the Planning Inspectorate and the Department, to support councils get local plans updated or in place. The Planning Inspectorate is working in particular with authorities with published plans about to be examined, and the LGA's Planning Advisory Service is offering support to councils working towards</p>

No	Key Environmental Report findings	Response
		<p>plan publication. The Inspectorate continues to work quickly to examine plans already submitted, and the focus now is on maintaining a strong pipeline of plans coming through for examination.</p> <p>Furthermore, the Government has already introduced, or is introducing, a range of measures to make the planning system work more effectively and efficiently. These measures are designed to create the conditions that support local economic growth, increase building and remove barriers that stop local businesses creating job. Specific measures build on the measures in the Localism Act and the introduction of the National Planning Policy Framework and include:</p> <ul style="list-style-type: none"> <li>• proposals to extend permitted development rights for a trial period of 3 years;</li> <li>• instructing the Planning Inspectorate to respond quickly to all major economic and housing-related appeals;</li> <li>• proposals to speed up the process for determining planning appeals;</li> <li>• giving developers extra time to get their sites up and running before planning permission expires; and</li> <li>• through the Growth and Infrastructure Bill, giving new powers to the Planning Inspectorate to take over the role of making planning decisions in an area if the local authority has a record of consistently slow or poor quality decisions.</li> </ul> <p>In conclusion, the Government considers that any uncertainty of impacts until local plans are in place are mitigated by measures outside the Plan to Revoke the South East Regional Strategy.</p>
4.	The effects of revocation of policies which provide strategic direction whose requirements extend	<p>The Government notes the findings of the Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that the</p>

No	Key Environmental Report findings	Response
	<p>beyond the boundaries of a single authority, such as strategic employment sites will be more uncertain until all participating local authorities define and agree areas of co-operation and implement the duty to co-operate and then reflect them in their adopted plans.</p>	<p>uncertain nature of the effects are mitigated by measures outside the Plan to Revoke</p> <p>The statutory duty to co-operate, set out in section 33A of the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act 2011, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and co-operation to address larger than local issues, including those set out in paragraph 156 of the Framework (homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape) and taking account of paragraph 160. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the duty to co-operate in preparing the development plan.</p> <p>The duty to co-operate reflects the Government’s broader approach to locally-driven cooperation to address the challenges of growth, including the strategic role played by Local Enterprise Partnerships. There are eight Local Enterprise Partnerships in the South East region: the South East Local</p>

No	Key Environmental Report findings	Response
		<p>Enterprise Partnership, Coast to Capital, Solent, Enterprise M3, Thames Valley Berkshire, Oxfordshire City Region, Buckinghamshire Thames Valley, and the South East Midlands Local Enterprise Partnership. Their remit is to drive growth across their area making the most of its inherent strengths.</p> <p>For example, Solent have brought forward Solent Enterprise Zone on Daedalus - 82 ha decommissioned Royal Navy airfield located on the Gosport peninsula, with a focus on advanced manufacturing, aerospace, marine, green technologies and business services. The aim is to create 3,500 jobs by 2026 and the Local Enterprise Partnerships intends to launch £2.94m fund for small and medium sized enterprises based on or moving to the Enterprise Zone. The South East Local Enterprise Partnership have brought forward an enterprise zone covering a 51 ha site focused on medical technologies and advanced manufacturing in Harlow and 100 ha (Pfizer 'Discovery Park' site) focused on life sciences, pharmaceutical, bio-technology and broader R&amp;D (including chemicals, food and renewable energy at Sandwich.</p> <p>Furthermore, in Sussex and Surrey, the Gatwick Diamond has been established as a 'business led' partnership, originally intended to support economic growth. It has helped authorities to manage cross-boundary planning priorities, which are being taken forward through a Local Strategic Statement and using tools like a Memorandum of Understanding. It is also part of the wider Coast to Capital Local Enterprise Partnership and links are beginning to be made between the Gatwick Diamond partnership and the Local Enterprise Partnership. The Partnership for Urban South Hampshire was originally established to support and promote economic-led growth in the South Hampshire area. It has in place a strong governance structure to manage a wide range of strategic planning and</p>

No	Key Environmental Report findings	Response
		<p>economic issues and has been responsible for a significant amount of joint evidence to support Local Plan-making. The spatial strategy is currently being updated to take account of a revised economic strategy and to manage a shortfall in housing provision.</p> <p>Local Enterprise Partnerships are also engaged in ensuring policies which provide strategic direction whose requirements extend beyond the boundaries of a single authority such as strategic infrastructure are taken forward, for example partnership working between Buckinghamshire, South East Midlands and Oxfordshire Local Enterprise Partnerships to bring forward East West rail, a strategic rail route linking Ipswich, Norwich and Cambridge, with Letchworth, Bedford, Milton Keynes, Bicester and Oxford. The consortium has brought together local authorities across stretch of proposed line, rail industry and private sector.</p>
5.	<p>Whilst the duty to co-operate could well address a wide range of strategic issues, such as the delivery of green infrastructure, there is uncertainty as to how this might work, particularly in the short to medium term, both by topic and geographically. Whilst there are examples in the South East where this has already worked successfully, if wider arrangements are ineffectual or lack support, for some issues, such as renewable energy, biodiversity enhancement or landscape conservation, their potential will not be realised.</p>	<p>The Government notes the findings of the Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the Plan to Revoke.</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The National Planning Policy Framework makes clear cross boundary co-operation should apply in particular to the strategic priorities set out in paragraph 156. These matters include climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The duty</p>

No	Key Environmental Report findings	Response
		<p>to co-operate not only means that authorities are required to work collaboratively when developing their local plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>The National Planning Policy Framework sets out a set of core land use planning principles which should underpin both plan-making and decision-taking – including encouraging the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the statutory duty to co-operate. These include the requirements for local authorities to have a positive strategy to promote energy from renewable sources; design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily; approve applications for renewable energy if the impacts are (or can be made acceptable); and co-operate to deliver strategic outcomes which include mitigating climate change. The National Planning Policy Framework’s proactive, plan-led approach sits within a wider set of requirements and policy initiatives to deliver renewable energy. These include the UK’s legally binding target that by 2020 15% of energy should come from renewable energy. Additionally, there is a specific duty on Local Planning Authorities to ensure their local plan includes policies designed to mitigate climate change.</p> <p>Existing legislation concerning environmental protection remains (legislation includes the Habitats Directive, Water Framework Directive and the Floods and Water Management Act 2010 – which includes a duty to co-operate). Local Planning Authorities are required by the</p>

No	Key Environmental Report findings	Response
		<p>National Planning Policy Framework to undertake a Strategic Flood Risk Assessment, preferably at a catchments level through joint co-operation – there are examples of joint working on Strategic Flood Risk Assessments throughout South East England (e.g. Partnership for Urban South Hampshire, and Hart District Council and Surrey Heath Borough Council).</p> <p>Six Energy National Policy Statements (including one on nationally significant renewable energy infrastructure) set out the need for certain infrastructure and policies against which applications for development consent for energy projects will be considered. These documents include the requirements for applicants to address economic, social and environmental impacts of a scheme; they also enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted.</p> <p>Cross-boundary policy arrangements are also in place on minerals and waste issues. Mineral planning authorities work together, including through the Aggregates Working Party for the South East of England, to provide a steady and adequate supply of minerals. Similarly waste authorities work together to plan strategically for waste management, including through the South East Waste Planning Advisory Group.</p> <p>The National Planning Policy Framework expects the planning system to protect and enhance valued landscapes. It states that planning should protect and enhance valued landscapes, minimise impacts on biodiversity and provide net gains in biodiversity where possible. It makes clear that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, and that to minimise impacts on biodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority</p>

No	Key Environmental Report findings	Response
		<p>boundaries.</p> <p>Nature Improvement Areas provide cross-boundary projects where partners' work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The initial 12 Nature Improvement Areas include the Greater Thames Marshes, much of which is in Kent, and the South Downs 'Way Ahead' Partnership.</p> <p>The Partnership for Urban South Hampshire published a Green Infrastructure Strategy in 2010 and adopted an accompanying Implementation Framework in October 2012. The strategy identifies sub-regional strategic initiatives and project proposals, seeks to maximise multifunctional use of open space and natural spaces for a range of benefits, promotes connectivity of all types of greenspace at a range of scales and provides a key element of the sub-region's mitigation strategy in relation to the Conservation of Habitats and Species Regulations 2010.</p> <p>Reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live is part of the Government's broader approach set out in, for example, 'Enabling the transition to a green economy', and the Government's 'Biodiversity 2020' strategy, and in the context of statutory requirements. Strategic partnerships, including Local Nature Partnerships such as that for Thames Gateway, Climate Local, and the new arrangements for Lead Local Flood Authorities, are examples of how co-operation is already a key part of the wider framework addressing the issues raised.</p>
6.	Under revocation, a number of policies that contain regional targets (such as those for brownfield land) will be lost. In the case of brownfield land, the	The Government notes the findings of the Environmental Report, including that the stock of previously developed land suitable for housing is the largest of any region and the high proportion of development on previously developed land (78% in 2008) is likely to continue.



No	Key Environmental Report findings	Response
	<p>National Planning Policy Framework does require preferential use of brownfield land and local planning authorities can still set local targets; however, the removal of the specific target could reduce the amount of brownfield land reused for development and lead to an increase in development on greenfield sites.</p>	<p>In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects on reuse of brownfield land and development on greenfield sites which may result from revocation.</p> <p>The National Planning Policy Framework encourages the effective use of land by reusing brownfield land, provided that it is not of high environmental value but does not specify a rigid target or absolute prioritisation of brownfield land. It makes clear that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality</p> <p>The National Planning Policy Framework directs significant development towards the most sustainable locations. For example, developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also provides clear policies to guide local decisions on land allocations, including:</p> <ul style="list-style-type: none"> <li>• land allocations preferring land of lesser environmental value;</li> <li>• planning should remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate;</li> <li>• the presumption, set out at paragraph 14 of the National Planning Policy Framework, in respect of both plan-making and decision taking;</li> <li>• sites where development should be restricted including sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt,</li> </ul>

No	Key Environmental Report findings	Response
		<p>Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion; and</p> <ul style="list-style-type: none"> <li>• planning decisions ensuring that flood risk is not increased elsewhere and that development located in areas of flood risk gives priority to the use of sustainable drainage systems.</li> </ul> <p>Other statutory and policy measures are in place to address any consequential effects that may occur on biodiversity, landscape and water resources, such as:</p> <ul style="list-style-type: none"> <li>• existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Floods and Water Management Act 2010);</li> <li>• existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 &amp; 11, and PPS10);</li> <li>• other government policy (such as that articulated in the Natural Environment White Paper); and</li> <li>• actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.</li> </ul>
7.	<p>In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and</p>	<p>The Government notes the findings of the Environmental Report.</p> <p>Section 2.4 of the Environmental Report makes clear that Regional Strategies have not led to level of plan provision or delivery of housing that was expected.</p> <p>In noting the findings of the Environmental Report, the Government considers that the effects on the population and health Strategic Environmental Assessment topics</p>

No	Key Environmental Report findings	Response
	<p>housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create or exacerbate socio-economic disparities (reflected in the Strategic Environmental Assessment as effects on the population and health topics) which are difficult to reconcile without significant interventions.</p>	<p>are mitigated by measures outside the Plan to Revoke.</p> <p>The National Planning Policy Framework asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework. They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>The New Homes Bonus (NHB) is a powerful and permanent incentive for local authorities and communities to increase their aspirations for housing growth. NHB is based on the additional council tax raised - using the national average in each band - for additional homes (new builds and conversions) and long term empty properties brought back into use.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p>
8.	<p>Over the medium and longer term, the wider effects of setting local housing and employment</p>	<p>The Government notes the findings of the Environmental Report and judgements made on the potential wider effects. The Government have introduced broader policy</p>

No	Key Environmental Report findings	Response
	<p>land policies and targets, could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets (such as increased demand for travel, waste management facilities and water resources and the effects from land take and disturbance on biodiversity and landscapes). For the South East, this could be critical for resources such as water which, whilst addressed through mechanisms such as Water Resource Management Plans and the Environment Agency River Basin Management Plans, could be affected by absence of the strategic overview of regional planning which would seek to balance regional environmental capacity and the need for growth.</p>	<p>measures outside of the Plan to Revoke, for example, the New Homes Bonus is designed to ensure that communities which are growing can mitigate the strain of increased housing and respond to community ambitions, for example by providing local services, unlocking infrastructure and community facilities. The provisional allocations for all England local authorities were published in December 2012. The New Homes Bonus complements broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>The National Planning Policy Framework instead asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (such as the protections on Green Belt, high grade agricultural land, Areas of Outstanding Natural Beauty etc). They should prepare Strategic Housing Market Assessment to assess this need, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>They should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The practice guidance on Strategic Housing Land Availability Assessment states that the study area should preferably be a sub regional housing market area, but may be a local planning authority area, where necessary.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the</p>

No	Key Environmental Report findings	Response
		<p>homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>The Government continues to monitor housing supply across England at local authority level.</p> <p>The National Planning Policy Framework directs significant development towards the most sustainable locations. For example, developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure than the system of planning obligations where lengthy negotiations often create severe delays.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources), such as:</p> <ul style="list-style-type: none"> <li>• existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Floods and Water Management Act 2010);</li> <li>• existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 &amp; 11, and PPS10);</li> <li>• other government policy (such as that articulated in the Natural Environment White Paper);</li> </ul>

No	Key Environmental Report findings	Response
		<ul style="list-style-type: none"> <li>actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.</li> </ul>
9.	<p>At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences (with differential effects on the SEA topics population and human health in regions arising from the differing viability of (affordable) housing, employment opportunities and transport infrastructure) and reliance on other policy instruments for their resolution.</p>	<p>The Government notes the findings of the updated Environmental Report. The Government considers that there are other, broader drivers of spatial change. For instance, there are eight Local Enterprise Partnerships in the South East of England region: the South East Local Enterprise Partnership, Coast to Capital, Solent, Enterprise M3, Thames Valley Berkshire, Oxfordshire City Region, Buckinghamshire Thames Valley, and the South East Midlands Local Enterprise Partnership. Their remit is to drive growth across their area making the most of its inherent strengths.</p> <p>We note the judgement that there could be a reliance on other policy instruments. The Local Growth White Paper 2010, "Realising Every Place's Potential", established the Government's position on regional economic circumstances and set the framework for the ongoing activity of Local Enterprise Partnerships and investments such as the Growing Places Fund and the Regional Growth Fund.</p>

# Chapter 4

## How consultation on the Environmental Reports has been taken into account

### 4.1 Overview

As part of the environmental assessment of the revocation of the Regional Strategies, there has been consultation with the statutory consultation bodies on the scope and level of detail of the Environmental Reports, followed by a public consultation on the Environmental Reports on the effects of revoking each of the eight regional strategies.

Detailed responses to the initial Environmental Report on the South East, published in October 2011, were provided by consultees and summarised in the updated Environmental Report, published in October 2012.

The consultations and how they have been taken into account is summarised below.

### 4.2 Scoping Consultation

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be included in the Environmental Reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. Their comments on individual regions have been taken into account in the Environmental Reports for each region.

The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation. Scottish Natural Heritage considered that the implications for strategic planning for green infrastructure and the interface with the marine environment should be considered.

**Annex A** provides more detailed information on the responses to the scoping consultation and the Government response (which has been updated for inclusion in this Post Adoption Statement).

## 4.3 Public Consultation on the initial Environmental Report

As part of the assessment of the revocation of the Regional Strategies a public consultation on the eight Environmental Reports on the effects of revoking each of the eight regional strategies was undertaken. Consultation on the Environmental Reports was announced in both Houses of Parliament through a Written Ministerial Statement and copies were sent by email to the statutory consultation bodies, the equivalent organisations in the devolved administrations, all local planning authorities and organisations thought to have an interest in the process. Copies of the reports were also published on the Department for Communities and Local Government website. The consultations ran from 20 October 2011 to 20 January 2012.

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the Environmental Reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government Strategic Environmental Assessment Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). 15 responses dealt specifically with the environmental report for the South East - 6 responses were received from local planning authorities within the South East. A further 64 dealt solely with environmental reports for regions other than the South East. A summary of the consultation responses relevant to the South East Environmental Report is set out at Appendix F of the updated Environmental Report.

A high level summary of the issues raised on the initial report and the response to those is set out in **Table 4.1** below. **Annex A** presents more detailed information and the Government's responses.

**Table 4.1 Summary of consultation responses to the initial Environmental Report and the Government response**

Issue	Summary of consultation responses to the initial Environmental Report	Response
The overall approach taken to Strategic	The Environment Agency supported the broad approach to the analysis presented in the October 2011	Section 1 of the updated Environmental Report sets out how the report meets the requirements of the Strategic



Issue	Summary of consultation responses to the initial Environmental Report	Response
Environmental Assessment	<p>environmental reports. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the South East Plan on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive</p>	<p>Environmental Assessment Directive.</p> <p>The impacts of revoking, retaining or partially revoking the South East Plan have been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This includes Cultural Heritage – including architectural and archaeological heritage.</p>
Assessment	<p>The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of Local Plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.</p>	<p>The updated Environmental Report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the South East Plan in the short, medium and long term against all 12 Strategic Environmental Assessment topics, taking into account the content of Local Plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-technical summary is provided.</p>

Issue	Summary of consultation responses to the initial Environmental Report	Response
Reliance on the National Planning Policy Framework	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the updated Environmental Report takes account of the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the South East Plan would weaken certain policies, particularly the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
Reliance on the duty to co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Government has introduced a new duty to co-operate and supporting regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the Local Plan independent examination. In addition the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint

Issue	Summary of consultation responses to the initial Environmental Report	Response
		working to be undertaken by authorities. The National Planning Policy Framework also sets out the requirements for sound Local Plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.
Individual Topics	Respondents raised a number of questions about individual topics. In particular, respondents thought that the impact of the revocation of the South East could impact on Green Belt, the provision of gypsy and traveller pitches, housing allocations, heritage, waste management, biodiversity, renewable energy, transport, water, brown field land, coast, flooding and managed woodland.	Individual policies for the planning of individual topics are described in the updated Environmental Report, drawing on the policies set out in the National Planning Policy Framework.

As a result of considering the responses received, the changes made to the approach to the updated assessment were as follows:

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 Strategic Environmental Assessment Directive Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the Plan to Revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.
- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the Strategic Environmental Assessment Annex Directive I(f) topics.

- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects.
- Providing additional information on likely secondary, cumulative and synergistic effects of the Plan to Revoke the regional strategies.
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy.
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate.
- Providing further information that includes proposals to monitor any significant effects.

The updated Strategic Environmental Assessment of the Plan to Revoke the South East Regional Strategy was undertaken in 2012 by AMEC on behalf of the Department for Communities and Local Government.

## 4.4 The Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the South East Regional Strategy ran from 11 October 2012 until 6 December 2012.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the Regional Strategy for the South East have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the South East have been identified, described and assessed; and,
- the arrangements for monitoring.

In total 35 written responses were received summarised by interest group:

- 6 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- 15 Local planning authorities (Arun District Council, Aylesbury District Council, Basingstoke and Deane Borough Council, Cherwell District Council, Dorset County Council, Horsham District Council, Kent County Council, Mid Sussex District Council, Milton Keynes Council, New Forest National Park, Oxfordshire County Council, the Royal Borough of Windsor & Maidenhead, South Oxfordshire District Council, Thames Basin Heaths Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council) and Surrey Heath Borough Council);
- 1 Parish Councils (Aspley Guise Parish Council);
- 5 NGOs and local pressure groups (Campaign for the Protection of Rural England (Hampshire Branch), Royal Society for the Protection of Birds, South Downs Society, Town and Country Planning Association, Woburn Sands and District Society);
- 1 Industry representative (RenewableUK);
- 5 Developers and planning consultants (Barton Willmore, GVA, Gleeson, Januarys and Savills and DAC Beachcroft);
- 2 Individuals (J.D.I.Baker and Graham N. Phillips).

A summary of the comments and the Government's response is presented in **Table 4.2** below. Comments are structured by the questions asked above. Details of the comments are set out in **Annex B**.

**Table 4.2 Summary of consultation responses to the updated Environmental Report**

Issue	Summary of consultation responses to the updated Environmental Report	Response
<b>The overall approach taken to Strategic Environmental Assessment</b>	<b>English Heritage, Natural England, the Environment Agency and the Town and Country Planning Association</b> considered that the Environmental	The Government welcomes the comments on the updated Environmental Report and notes that the opportunity to use the additional information gained through the public

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Report was a significant improvement, providing a more rigorous approach to the analysis, presented in a more detailed and clearer document.</p> <p><b>Natural England</b> welcomed that their earlier comments had largely been incorporated in the options taken and the methodology pursued while the <b>Environment Agency</b> agreed with the overall approach taken to assess the options.</p> <p><b>Aylesbury Vale District Council</b> commented that the updated Environmental Report was a meticulously prepared assessment of the impacts of revoking the South East Regional Strategy and agree with the conclusions.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) concurs that the Strategic Environmental Assessment is compliant with the requirements of the EU Directive (2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004.</p>	<p>consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence, to update and build on the earlier assessments have been an important contribution to making the final decision on the Plan to Revoke the South East Regional Strategy.</p>
<p><b>Additional information</b></p>	<p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and</p>	<p>The 251 page Appendix E of the updated Environmental Report presents the detailed</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Wates) state that the baseline review appears comprehensive although in respect of Population the notable absence of data is that of housing need and demographic change.</p> <p><b>Horsham District Council</b> also note that there is more recent evidence available on housing need and demographic changes.</p> <p><b>Milton Keynes Council</b> states the updated Environmental Report does not refer to emerging plans and the Milton Keynes Core Strategy is a key example. They suggest that this should be included in the review of plans in Appendix C.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) also provide supplementary evidence on Local Plans in the region.</p>	<p>information that makes up the baseline for the 12 Strategic Environmental Assessment topics considered in the assessment of the plan to revoke the South East Regional Strategy. Proportionate to a national plan, the information presented is national and regional in nature. Section 2.3.3 of Appendix E describes the baseline for both the South East demographics and housing. Section 2.5.2 of Appendix E describes the evolution of this baseline with particular reference to housing need (albeit in qualitative terms).</p> <p>Where relevant, emerging Local Plans have been referenced in the assessment of the specific Regional Strategy policies contained in Appendix D of the updated Environmental Report. For example, for Regional Strategy Policy MKAV1: Housing Distribution by District 2006-2026, the Core Strategy for Milton Keynes is referenced.</p> <p>The additional housing and Local Plan data identified is helpful in providing a more complete picture; however it does not materially affect the assessment or its broad conclusions, as acknowledged by</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>respondees, 'this overall broad conclusion for the purposes of the Strategic Environmental Assessment as an assessment and method in itself is not disputed' (Savills and DAC Beachcroft).</p>
<p><b>Likely significant effects</b></p>	<p>A number of consultees (<b>Savills and DAC Beachcroft, Town and Country Planning Association, Surrey Heaths Borough Council and the Joint Strategic Partnership Board (hosted by Surrey Heaths Borough Council), January's, Dorset County Council, Campaign to Protect Rural England</b>) questioned aspects of the assessments concerning:</p> <ul style="list-style-type: none"> <li>• the assumptions around the effectiveness of the duty to co-operate;</li> <li>• the effect of uncertainty and delay from revocation in the short and medium term on the Strategic Environmental Assessment topics, population and human health;</li> <li>• the assessment of policies H1, MKAV1, MKAV2 and NRM6 (which relate to the Thames Basin Heaths</li> </ul>	<p>Assumptions and uncertainties are explicit within each policy assessment in Appendix D and within section 3.4.5 of the updated Environmental Report.</p> <p>The Savills and DAC Beachcroft submission reviewed the short, medium and long term assessments of the policy H1 of the South East Plan and proposed less positive scoring for the Strategic Environmental Assessment topics of population and human health due to the effects of delays and uncertainty. It appears from the justification given that the basis of the Savills proposed amendments is different from those used in the updated Environmental Report (Appendix E, Tables 2.2 and 3.1). Changes are not deemed necessary, given that the differentiation between retention and revocation is clear and comments on the effects of uncertainty and delay in the short and medium term are</p>



Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Special Protection Area);</p> <ul style="list-style-type: none"> <li>'knock on' effects on neighbouring authorities and on adjacent regions.</li> </ul> <p><b>RenewableUK</b> and the <b>Environment Agency</b> suggested that further consideration needs to be given on how strategic issues such as renewable energy production, biodiversity enhancement and landscape conservation, will be tackled locally.</p>	<p>made throughout the the updated Environmental Report (for example page xiii of the Non Technical Summary, paragraph 1 of page 93, paragraph 5 of page 173) and summarised in the key findings in Table 3.2 of this Post Adoption Statement.</p> <p>The Government does not believe that retaining policies and targets in the South East Regional Strategy is necessary to mitigate environmental effects.. Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with, including partial revocation.</p> <p>The effects of retention and revocation of policy NRM6 were assessed in Appendix D to the updated Environmental Report (along with the other 179 policies that make up the Regional Strategy). The assessment identified significant positive effects on biodiversity, flora and fauna of retention of Policy NRM6, and that these are similar to the effects of revocation due to the mitigation strategy contained in the Thames Basin Heaths Special Proection Area Delivery</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>Natural England</b> commented that the presentation of the material in the conclusion does not allow for consideration of how the scoring has been reached. Some of this information is contained within the extensive appendix, however it is not clearly referenced and much of the information in the</p>	<p>Framework and implemented by the Thames Basin Heaths Strategic Partnership. Ongoing implementation will however require continued co-operation between members in the Partnership.</p> <p>Section 4.4 'Secondary, Cumulative and Synergistic Effects' of the updated Environmental Report provides explicit commentary on the wider implications and effects of the plan to revoke the Regional Strategies, acknowledging that the plan is national in scope as well as applying to the eight regions.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 and summarised in table NTS3 of the updated Environmental Report.</p> <p>Section 3 of the updated Environmental Report sets out the Strategic Environmental Assessment methodology used in the assessment. Appendix D contains the assessment of the effects of retention and revocation against all Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>appendix does not relate to the assessment.</p>	<p>and temporary and positive and negative effects. The commentary outlines the likely significant effects, any mitigation measures, assumptions and uncertainties. Appendix E focuses on the likely significant effects. All information is summarised in Section 4, and 5 of the updated Environmental Report and then further summarised in the Non Technical Summary.</p>
<p><b>Reasonable Alternatives</b></p>	<p><b>English Heritage</b> noted that arguments could be made for any of the options of full or partial revocation of the South East Regional Strategy. They conclude ‘simplicity has many advantages and the complexity of saved policies in county structure plans and local plans has added difficulties to public understanding of strategic planning in recent years’.</p> <p><b>Savills and DAC Beachcroft and Kent County Council</b> requested that the Government on a transitional basis should retain housing policies from the South East Plan in particular Policy H1 (Regional Housing Provision 2006-2026). Other consultees proposed retention of</p>	<p>Section 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation.</p> <p>The Government does not believe that retaining the whole of the South East Regional Strategy or specific policies suggested by consultees, either indefinitely or for a transitional period, is necessary to mitigate environmental effects. The duty to co-operate provides a robust vehicle for local</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>other individual policies (Mr <b>J.D.I.Baker</b> and T4 Parking, <b>RenewableUK</b> and NRM13, NRM14, NRM15 and NRM 16, <b>January's</b> and MKAV1 and MKAV2). <b>Campaign to Protect Rural England</b> Hampshire consider that there could be a partial revocation so that all quantified policies or policies that are spatially specific and which allocate a quantum of development or land for development to a particular location or local authority in the region (South East Plan policies for housing allocations; employment, minerals allocations; waste disposal) would be revoked, but that the non spatial policies would be retained.</p>	<p>planning authorities and other prescribed bodies to deliver cross-boundary strategic planning where needed.</p> <p>Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with including partial revocation.</p>
<b>Monitoring</b>	<p><b>English Heritage</b>, the <b>Environment Agency</b>, <b>RenewableUK</b> and <b>Savills and DAC Beachcroft</b> suggested additional monitoring measures.</p>	<p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the South East Regional Strategy are contained in this Post Adoption Statement (Chapter 6 and Annex C).</p>
<b>Individual Topics</b>	<p>Respondents raised a number of questions about individual topics. In particular, respondents thought that the impact of</p>	<p>Appendix D of the updated Environmental Report contains the assessment of the effects of retention and revocation against all</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>the revocation of the South East Regional Strategy could impact on housing, parking, renewable energy, New Forest National Park, heritage, green infrastructure, biodiversity, water resource management, flood risk and the Green Belt.</p> <p><b>Surrey Heath Borough Council, the Thames Basin Heaths Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council), Royal Society for the Protection of Birds and the Town and Country Planning Association</b> identified concern about the impacts that may arise if certain Regional Strategy policies that provide protection for the Thames Basin Heaths Special Protection Area were revoked.</p>	<p>Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects.</p> <p>Appendix E of the updated Environmental Report presents information covering all ten assessment topics at national, regional and sub-regional levels, consistent with the requirements of Annex I (b) to (e) of the Strategic Environmental Assessment Directive and focuses on those likely significant effects identified in Appendix D.</p> <p>The Government notes the concerns raised about the revocation of certain policies until the Thames Basin Heaths Delivery Framework is incorporated into Local Plans. Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the plan as adopted, (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) in the light of the other reasonable alternatives dealt with including partial revocation.</p>

Four representations (from Arun District Council, Basingstoke and Deane Borough Council, Mid Sussex District Council and Woburn Sands and District

Society) supported the Government's intention to revoke regional strategies, because they believe regional strategies impose top-down forms of development upon communities. They wanted regional strategies to be revoked so that decisions on the appropriate level of housing to meet local needs can be taken at a local level.

In light of the findings of the assessment as reported in the Environment Reports, the comments received from consultees and the framework for environmental protection and planning that is in place, the Government is content that environmental considerations have been adequately incorporated into the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy, and to revoke all remaining saved structure plan policies in the region with the exception of Oxfordshire Structure Plan policy H2 regarding the development of land at the former RAF base at Upper Heyford). As explained in Chapter 5 below, where significant effects and/or uncertainty have been identified, a programme of monitoring has been proposed to enable future consideration of whether any further mitigation or intervention is needed.

# Chapter 5

## The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

### 5.1 Policy background

The Government proposed the Plan to Revoke the South East Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth.

Every local area has its own set of needs and priorities, its aspirations, unique features and heritage. Only local people understand this so when they have the tools to plan, development happens through consensus by recognition of the benefits of development to the community and with wider benefits for growth. Local empowerment can lead to development that is more sensitive and responsive to the character of the communities in which we live, including to habitats and the natural environment.

While the Government believes that local empowerment can support growth, it also recognises that cross-boundary development, such as housing or transport, are critical to driving economic growth. So, the revocation of the South East Regional Strategy does not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans.

The Localism Act 2011 has complemented the powers to remove regional strategies with a new statutory duty to co-operate (inserting a new section 33A of the Planning and Compulsory Purchase Act 2004). The duty to co-operate requires local councils and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic matters in local and marine plans.

Through national planning policy, we will ensure that local plans are effective vehicles for strategic planning and growth. Local plans, produced by local people, are the keystone of the planning system. They are now the channel for strategic planning and set the framework for neighbourhood plans. In particular, the National Planning Policy Framework is clear that:

- the planning system should be genuinely plan-led and support sustainable economic growth, proactively driving the homes and jobs that we need.

- local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites.
- in line with the presumption in favour of sustainable development, local councils should approve development that accords with the local plan. Where that plan is out of date, councils must grant planning permission for development that is sustainable without delay.
- local councils must plan in their local plans for strategic development, reflecting the strategic priorities set out at paragraph 156 of the Framework.

The policies in the National Planning Policy Framework, and in particular the presumption in favour of sustainable development, provide certainty for local councils, developers and communities about the role of local plans in planning for growth and planning decisions.

The new **Planning policy for traveller sites** (March 2012) requires that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. It asks local authorities to:

- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities.
- set pitch targets for Gypsies and Travellers which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets, and a supply of specific, deliverable sites or broad locations for growth for six to ten and where possible for years 11-15.

The Government's planning reforms also include a package of incentives to encourage growth. These include the New Homes Bonus which rewards communities for each new home built; the Community Infrastructure Levy which enables councils to levy money on new development; and the Business Rates Retention which allows authorities to directly profit from business rates raised in their area.



This policy background sets in context the reasons for the Government's preferred option to revoke the Regional Strategy, modified to retain the policy on Thames Basin Heaths, and to revoke all remaining saved structure plan policies in the region with the exception of Oxfordshire Structure Plan policy H2 regarding the development of land at the former RAF base at Upper Heyford, and illustrates the structure of the planning system that will be left in place post revocation.

## 5.2 The Reasonable Alternatives

The initial Environmental Report on the proposed revocation of South East Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the regional strategy entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F to the updated Environmental Report) including partial revocation. In considering these responses and following the application of Article 5(1) of the Strategic Environmental Assessment Directive, the following alternatives to the Plan to Revoke were taken forward for the updated Strategic Environmental Assessment:

- **Retention** of the South East Regional Strategy but not updating it in the future.
- **Partial revocation of the South East Regional Strategy either by:**
  - Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period all the spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and revoking the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period policies, ambitions and/or priorities, the revocation of which may lead to likely significant negative environmental effects.

## 5.3 The Reasons for Choosing the Plan to Revoke the South East Regional Strategy in light of the other Reasonable Alternatives dealt with

The Government has carefully considered each of the reasonable alternatives and the environmental effects assessed in relation to those reasonable alternatives, set out in the updated Environmental Report<sup>6</sup>. In doing this the Government has taken account of the consultation responses to both the initial and the updated Environmental Reports. The Government welcomes the comments on both of those reports and notes that that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence to update and build on the earlier assessments, have been an important contribution to making the final decision on the Plan to Revoke the South East Regional Strategy. The summary of consultation responses set out in this Post Adoption Statement (see Annex B) show that consultees welcomed the rigorous approach to assessment of environmental effects.

One respondent recognised the comprehensive baseline, but considered that further evidence should be provided on household growth, population and housing delivery. Some respondents questioned progress of Local Plans, with one respondent providing supplementary evidence on Local Plans in the region. The Government carefully considered the additional data and evidence provided, but believes that the updated Environmental Report provides substantial additional information on the environmental baseline and the environmental characteristics of the South East region. The Government are grateful for the additional information on housing, including information on emerging policies and has further updated evidence on plan progress. However, the Government did not consider that these points or the additional evidence materially affected the assessment of the environmental effects.

Some respondents questioned aspects of the assessment concerning assumptions, uncertainty about the impacts on, and arising from, housing delivery in particular on population, human health, air quality and climate; the lack of effects identified and the assessment of policies; the impacts on surrounding regions; and the consideration of strategic issues. The Government considers that all these issues have been dealt with rigorously in the updated Environmental Report.

There were questions from some respondents about the reasons for the selection of reasonable alternatives dealt with and whether there had been consideration of an alternative that could retain the Regional Strategy, maintaining and revising certain policies. Some respondents suggested a preference for one of the reasonable alternatives (retention for a transitional period of spatially specific and quantified policies). Some respondents asked

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<sup>6</sup> Strategic Environmental Assessment of the Revocation of the South East Regional Strategy: AMEC Environment & Infrastructure UK Limited: October 2012

for the whole of the South East Regional Strategy, or individual policies, to be retained (either permanently or for a transitional period) to deliver Regional Strategy outcomes including those on suitable locations for development, housing targets, the Milton Keynes area, the Thames Basin Heaths Special Protection Area, renewable energy, parking, and the New Forest National Park, although other respondents preferred full revocation or the revocation of specific policies. As detailed in this Post Adoption Statement (including at Table 3.2 and Annex B of this Post Adoption Statement), the Government considers that these have been adequately covered in the updated Environmental Report, including at Section 2.4 (setting out the Reasonable Alternatives) and the assessment at Chapter 4. The reasons for adopting the Plan to Revoke the South East Regional Strategy, modified to retain the policy on Thames Basin Heaths, and to revoke all remaining saved structure plan policies in the region with the exception of Oxfordshire Structure Plan policy H2 regarding the development of land at the former RAF base at Upper Heyford, is set out in this Post Adoption Statement, in accordance with the requirements of the Strategic Environmental Assessment Directive.

Some respondents thought it unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at sufficiently large scale, and that the National Planning Policy Framework would not provide sufficient protections in the event of more detailed policies in the South East Regional Strategy being revoked. Some respondents raised concerns about the potential for a policy gap in the short to medium term between revocation and detailed local plan policies being in place, which they did not consider to be filled by the National Planning Policy Framework. The Government disagrees with this view in light of the policies on strategic planning set out in the National Planning Policy Framework, the fact that councils that have not complied with the duty may fail the local plan independent examination and that from 27 March 2013 transitional arrangements on implementation of the National Planning Policy Framework will cease to apply. The Government also notes that key environmental protections remains in place (which are set out in more detail at in Annex B and Table 3.2 of this Post Adoption Statement). The Government considers that all these issues have been dealt with rigorously in the updated Environmental Report.

Some respondents suggested additional monitoring measures. The proposals for monitoring, which take account of these responses, are set out in Chapter 6 and Annex C of this Post Adoption Statement.

Lastly, there were also some questions from some respondents on individual topics such as Habitats<sup>7</sup>, housing, parking, historic environment and green infrastructure provision. The Government considers that these have been adequately covered in the updated Environmental Report, as set out in this Post Adoption Statement (including at Table 3.2 and Annex B of this Post Adoption Statement).

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<sup>7</sup> This term is used to refer to sites protected under the European Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC).

In conclusion, none of the responses to the consultation on the updated Environmental Report has led the Government to reconsider the adequacy of the assessment of the environmental effects of the Plan to Revoke the South East Regional Strategy, and the reasonable alternatives to the Plan to Revoke, set out in the updated Environmental Report.

In light of this conclusion the Government considered each of the reasonable alternatives, and the environmental effects assessed in relation to those reasonable alternatives, as follows:

(i) On the **retention** of the South East Regional Strategy but not updating it in the future it was noted in the updated Environmental Report that there will be significant positive environmental effects, although these will be largely similar to those if the Regional Strategy were revoked. The areas where retention of the Regional Strategy would lead to significant negative effects is in relation to water resources, material assets, climate change and air quality arising from development associated with policies for housing, employment provision and airport development, although the Government notes that a similar policy performance is recorded for the revocation alternative. For the majority of policies, the updated Environmental Report found it difficult to identify clear differences between the effects of retention and revocation. The Government considers that the retention of the Regional Strategy would lead to a strategy that was part of the development plan and a consideration in plan-making and decision taking but with policies based on increasingly out of date evidence or which run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The Government does not therefore consider that it should pursue this alternative.

(ii) On **partial revocation**, the updated Environmental Report noted that there were a number of policies where potential significant negative environmental effects were identified for the **revocation of the quantified and spatially specific policies**. However, the effects were also identified for retention of the Regional Strategy. These include potential significant effects on water, air quality, climate and material assets, although revocation of some policies would have a significant positive effect on population. The Government does not therefore consider that it should pursue the revocation of all quantified and spatially specific policies. This is because the policies retained would become increasingly out of date or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The National Planning Policy Framework makes clear the evidence on which Local Plans should be based, including quantified demand, and where the duty to co-operate is particularly relevant.

(iii) Specific effects for **retention for a transitional period of policies which set the quantum for development or which are spatially specific** were identified in the updated Environmental Report. These include potential significant negative environmental effects on water and/or material assets and significant positive effects of some policies on population and human health, climatic factors, biodiversity and landscape. The updated Environmental

Report also noted that retention of these policies for a transitional period may result in some confusion with the intent of the National Planning Policy Framework and how they are to be applied. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would be based on increasingly out of date evidence or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning.

(iv) Regarding **retention of policies, the revocation of which may lead to likely significant negative environmental effects**, the updated Environmental Report found that there are no policies in the Regional Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. Where there is a potential significant negative effect this is the same issue for retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the Regional Strategy. The Government does not therefore consider that it should pursue this alternative.

The updated Environmental Report also notes that the effects on water will require concerted action by all responsible parties to resolve, although the water companies' statutory responsibilities and approach to water resource management planning is key. The updated Environmental Report also sets out a range of measures addressing effects on material assets which arise from the increase in demand for construction material and aggregates, which are in some cases finite resources.

However the Government notes the four representations received which requested the retention of policies regarding the Thames Basin Heaths Special Protection Area. The **Royal Society for the Protection of Birds**, **Surrey Heath Borough Council** and the **Thames Basin Heaths Joint Strategic Partnership Board**<sup>8</sup> (hosted by Surrey Heath Borough Council) and the **Town and Country Planning Association** consider that Policy NRM6 (Thames Basin Heaths Special Protection Area) should be retained. **Surrey Heath Borough Council** and the **Thames Basin Heaths Joint Strategic Partnership Board** also request partial retention of policies H1 (Regional Housing Provision 2006-2026), LF3 (Broad Amount and Distribution of Future Housing Development) and WCBV3 (Scale and Distribution of Housing Development) in terms of housing targets for all those local authorities affected by the Thames Basin Heaths Special Protection Area. The representations received are considered in detail at Annex B of this Post Adoption Statement.

The Government agrees with the conclusions of the updated Environmental Report that revocation of this policy would not have adverse effects on the

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<sup>8</sup> The Thames Basin Heaths Joint Strategic Partnership Board comprises the following local authorities and organisations: Bracknell Forest; Elmbridge; Guildford; Hart; Royal Borough of Windsor and Maidenhead; Runnymede; Rushmoor; Surrey Heath; Waverley; Woking; Wokingham; Hampshire County Council. The Board is advised by: Natural England; Berkshire Joint Strategic Planning Unit; Defence Estates; Forestry Commission; Federation of Master Builders; Open Spaces Society; Royal Society for the Protection of Birds and Wildlife Trusts in the South East.

Thames Basin Heaths and that ongoing implementation will require continued co-operation between members in the Partnership. The Government does not therefore consider it necessary to save Policy NRM6, or other policies, to mitigate environmental effects. The revocation of the South East Regional Strategy does not affect the national policy requirement to protect the Special Protection Area, or the legal requirements set out in the European Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), which are transposed into domestic law by the Conservation of Habitats and Species Regulations 2010. Any local planning authority, in exercising any of their functions must have regard to the requirements of these Directives. This includes the assessment in accordance with the Habitats Directive of implications for European sites (such as the Thames Basin Heaths Special Protection Area) of any plan or project which is likely to have a significant effect on it before it proceeds. Local Plans, prior to adoption will be subject to such assessment. Legislation is in place which requires Natural England to be consulted in respect of development that is likely to affect the Thames Basin Heaths.

However the responses received questioned the impact of revocation until the Thames Basin Heaths Special Protection Area Delivery Framework (a non-statutory document endorsed by the Thames Basin Heaths Joint Strategic Partnership Board) is incorporated into all relevant Local Plans. Comments were made about the timing of revocation and the desirability of having policies in place that support the Delivery Framework in order to provide clarity and use of the Delivery Framework as an efficient means of achieving the objectives it sets out. Comments were also made about the significant time and resource put into developing the agreed cross-boundary approach set out in the Delivery Framework, and the policies in the South East Plan which relate to the Thames Basin Heaths.

Given the importance of the Thames Basin Heaths Special Protection Area, the consultation responses on this issue, and the intentions of all relevant local planning authorities to bring forward local plans that are in line with policy NRM6, the Government proposes to retain this policy. Annex B of this Post Adoption Statement sets out in more detail the Government response to requests to save this policy and others regarding Thames Basin Heaths.

While considering that the co-operation required to implement the framework will be carried out under the duty to co-operate, the Government is retaining policy NRM6 in order to assist those local authorities bringing forward up to date local plan which incorporate the mitigation strategy contained in Thames Basin Heaths Special Protection Area Delivery Framework following responses to consultation as set out above. This approach reflects the fact that the policy as an agreed multi-authority approach which has been subject to significant joint working, and where a joint structure is in place (the Joint Strategic Partnership Board) which requested that the policy be saved. No responses specifically supporting revocation of this policy were received although six responses specifically asked for the whole of the South East Regional Strategy to be revoked.

Therefore in light of the policy background and reasons for the Plan to Revoke the South East Regional Strategy, consideration of the environmental effects of the Plan to Revoke and the reasonable alternatives, and consideration of responses to the Environmental Reports, the Government has decided to revoke the South East Regional Strategy and all remaining structure plan policies in the region except for policy H2 of the Oxfordshire Structure Plan 2016, but retain the following policy from the South East Plan:

“Policy NRM6: Thames Basin Heaths Special Protection Area

New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England.

Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. Where mitigation measures are required, local planning authorities, as Competent Authorities, should work in partnership to set out clearly and deliver a consistent approach to mitigation, based on the following principles:

- i. a zone of influence set at 5km linear distance from the SPA boundary will be established where measures must be taken to ensure that the integrity of the SPA is protected
- ii. within this zone of influence, there will be a 400m “exclusion zone” where mitigation measures are unlikely to be capable of protecting the integrity of the SPA. In exceptional circumstances, this may vary with the provision of evidence that demonstrates the extent of the area within which it is considered that mitigation measures will be capable of protecting the integrity of the SPA. These small locally determined zones will be set out in local development frameworks (LDFs) and SPA avoidance strategies and agreed with Natural England
- iii. where development is proposed outside the exclusion zone but within the zone of influence, mitigation measures will be delivered prior to occupation and in perpetuity. Measures will be based on a combination of access management, and the provision of Suitable Accessible Natural Greenspace (SANG).

Where mitigation takes the form of provision of SANG the following standards and arrangements will apply:

- iv. a minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants
- v. developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is

- in place to cater for the consequent increase in residents prior to occupation of the dwellings
- vi. access management measures will be provided strategically to ensure that adverse impacts on the SPA are avoided and that SANG functions effectively
  - vii. authorities should co-operate and work jointly to implement mitigation measures. These may include, inter alia, assistance to those authorities with insufficient SANG land within their own boundaries, co-operation on access management and joint development plan documents
  - viii. relevant parties will co-operate with Natural England and landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/amend the approach set out in this policy, as necessary
  - ix. local authorities will collect developer contributions towards mitigation measures, including the provision of SANG land and joint contributions to the funding of access management and monitoring the effects of mitigation measures across the SPA
  - x. large developments may be expected to provide bespoke mitigation that provides a combination of benefits including SANG, biodiversity enhancement, green infrastructure and, potentially, new recreational facilities.

Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.

The mechanism for this policy is set out in the TBH Delivery Framework by the TBH Joint Strategic Partnership and partners and stakeholders, the principles of which should be incorporated into local authorities' LDFs."

The updated Environmental Report set out that the Government was proposing to revoke all remaining saved structure plan policies in the region, with the exception of policy H2 (Upper Heyford) of the Oxfordshire Structure Plan 2016. It was noted that retention of this saved Structure Plan policy regarding development of land at the former RAF base at Upper Heyford in Oxfordshire will safeguard the site and its heritage value in the interim until the Proposed Submission draft of the Cherwell Local Plan (which includes reference to the conservation of the heritage interest of the site) is adopted. A number of consultees expressed the same reasons for supporting retention of this policy, and no comments were received on the proposal to revoke the other saved structure plan policies in the region.



# Chapter 6

## The measures decided concerning monitoring

Monitoring of the effects of the Plan to Revoke the South East Regional Strategy will focus on:

- The significant effects identified in the assessment that may give rise to irreversible damage, where appropriate, relevant mitigating measures can be taken; and
- Uncertain effects where monitoring would enable preventative or mitigating measures to be undertaken.

Consistent with the proposals of the updated Environmental Report, potential effects against all the environmental topics have been included in the monitoring framework. Specific additional monitoring suggestions were made by consultees and are outlined in the summary of consultation in **Annex B**. The final measures are presented in **Annex C**.

The monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts. For example, the Environment Agency's requirements under the Water Framework Directive, the Department for Environment, Food and Rural Affairs' requirements with regard to Air Quality Management Areas and the Department for Communities and Local Government's commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The metrics are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

The Department for Communities and Local Government will make periodic reference to the metrics and sources of information contained in **Annex C** to review the effects of revocation.

# Annex A

## Consultation and Partner Engagement – Initial Environmental Report

### Reponses to scoping stage of the preparation of the Initial Environmental Report

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be included in the Environmental Reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. The statutory bodies agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate.

**Table A1 Summary of statutory body's responses at the Strategic Environmental Assessment scoping stage (this Table has been revised following the close of consultation on the updated Environmental Report)**

No	General	Detailed comments	Raised by	Response
1.	Scope and Detail	The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation.	<b>Environment Agency, Natural England, English Heritage</b>	The updated Environmental Report was produced consistent with the requirements of the Strategic Environmental Assessment Directive. Responses to the detailed points raised at scoping stage are set out in the rest of the Table.
2	Reliance on the duty to co-operate and the National Planning Policy	The Environment Agency, Natural England and English Heritage questioned whether the reliance on the draft duty to co-operate was sufficient to capture and address cross-boundary	<b>Environment Agency, Natural England, English Heritage, Scottish Natural Heritage</b>	Since the scoping report was prepared the Government has published the National Planning Policy Framework in March 2012 and commenced provisions in the Localism Act 2011 implementing

No	General	Detailed comments	Raised by	Response
	Framework	<p>issues or cumulative effects of multiple local authorities' local plans. Scottish Natural Heritage thought there should be consideration of the impacts on the protection and enhancement of networks to allow species dispersal throughout Britain.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework. Since the National Planning Policy Framework was still in its draft form, this needs to be more fully considered. It is also difficult to predict what local authorities will do post revocation of regional strategies so that the environmental effects of their revocation is more likely to be "uncertain" rather than positive.</p>		the duty to co-operate.
3	Topics to be considered	The Environment Agency considered that the impacts on climate change, water quality and water resources should be fully assessed. The Water Framework Directive should be	<b>Environment Agency</b>	Appendix D of the updated Environmental Report published for consultation in October 2012 contains an assessment of the effects of retention and revocation of individual policies on climate change,

No	General	Detailed comments	Raised by	Response
		considered as well as strategic planning of water resources.		water quality and water resources. Appendix E reviews the baseline condition for each of the Strategic Environmental Assessment topics (including climatic factors and water) and assesses the likely effects on the baseline of retaining and revoking individual policies, the Regional Strategy as a whole and reasonable alternatives.
4	Water Quality	There are currently issues around accommodating growth within existing Waste Water Treatment Works consent limits, and without compromising Water Framework Directive requirements. This issue should be acknowledged in the assessment. The assessment could usefully inform the allocation of growth across catchments, which are likely to be wider than an individual local authority boundary. The assessment should also consider how strategic cross-boundary water quality issues will be dealt with following the revocation of the Regional Strategy.	<b>Environment Agency</b>	In accordance with Annex 1(f) of the Strategic Environmental Assessment Directive water quality issues have been assessed. This assessment includes the consideration of the topics in Appendix E of the updated Environmental Report, as part of the assessment of the retention and revocation of individual policies, the overall assessment of the revocation of the South East Regional Strategy and reasonable alternatives.  This analysis also takes account of how the duty to co-operate will underpin strategic cross-boundary planning by local planning authorities on issues such as water management.

No	General	Detailed comments	Raised by	Response
5	Water resources	<p>The Environment Agency considered that the demand for water is dependent on the number of households, number of occupants and the per capita consumption of occupants. If the post Regional Strategy forecast housing numbers increase, even with the same population and thus lower occupancy, then per capita consumption of water is likely to be higher, resulting in a higher demand for water. Similarly, if the number of houses forecast remained the same and the per capita consumption of water increased, or occupancy increased, then this would also increase the demand for water.</p> <p>Change in water use will be influenced by the post Regional Strategy policies of individual local authorities. These effects may not be uniform for all local authorities. Therefore, the net effects on water resources of having a regional strategy or not could be zero, more or less. Increases in housing numbers could be considered against the</p>	<b>Environment Agency</b>	<p>Appendix E of the updated Environmental Report supplements the previous baseline with substantial additional information covering all ten assessment topics at national, regional and sub-regional levels, consistent with the requirements of Annex I (b) to (e) of the Strategic Environmental Assessment Directive. Water resources have been assessed under the Strategic Environmental Assessment topic 'water' as part of the assessment of the retention and revocation of individual policies and the overall assessment of the revocation of the South East Regional Strategy and reasonable alternatives. This also takes account of the strategic planning cross-boundary issues which the water companies' Water Resources Management Plans address. Further statutory requirements on water companies under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning are designed to ensure a sustainable supply of water over the next</p>

No	General	Detailed comments	Raised by	Response
		<p>relevant water companies Water Resources Management Plan to ensure that the company is able to supply the additional households. The same applies to any redistribution of households within the existing overall housing numbers. Moving planned builds to another local authority area or within a local authority area may shift the demand into a different water company water resource zone. The effects of this on the company's ability to supply the 'additional' houses should be considered.</p>		25 years.
6	Waste	<p>Waste plans, required to meet the requirements of the Waste Framework Directive, will need a strong evidence base to support them.</p> <p>The Environment Agency noted that the local authorities in the South East are continuing to meet to discuss waste planning.</p> <p>The agreed apportionment figures and related policy allowed waste planning authorities to plan and monitor</p>	<b>Environment Agency</b>	Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst the Planning and Compulsory Purchase Act 2004 provides for two or more local planning authorities to prepare joint local plans either through joint working under Section 28 or through the establishment of a joint committee under Section 29. This allows unitary authorities

No	General	Detailed comments	Raised by	Response
		<p>consistently for the management of imported waste. Ways could be found to maintain this evidence base which local authorities rely on to address and monitor strategic waste issues. The assessment should consider the impact of the loss of regional waste data on waste planning authorities.</p>		<p>and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework including for the planning of waste infrastructure.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National Planning Policy Framework (paragraph 156) states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for</p>



No	General	Detailed comments	Raised by	Response
				waste and its ability to meet forecast demands. Further PPS10 The Waste Planning Policy Statement will remain in place until the National Waste Management Plan is published. Appendix C of the updated Environmental Report illustrates the progress that local authorities have made in the South East to prepare Waste Management Plans.
7	Climate Change	<p>Climate risk and associated adaptation actions should be assessed to help ensure resilience to future climate change. Local authorities could put monitoring mechanisms in place, as action or inaction by one local authority could impact on neighbouring authorities. We suggest that possible mechanisms for monitoring resilience to climate change are considered within the assessment.</p> <p>The initial Environmental Report stated that local authorities may find it useful to draw on regional data including assessments of the potential for renewable and low carbon energy. This</p>	<b>Environment Agency, Scottish Natural Heritage</b>	<p>Climate change issues are assessed as part of the climatic factors topic in set out in Appendix E of the updated Environmental Report. We have considered mechanisms for monitoring resilience to climate change and the proposals for monitoring, including for climatic factors, and were also considered in Section 6 and Annex C of this Post Adoption Statement.</p> <p>Data prepared at a regional level to inform the preparation of regional strategies is still available for local planning authorities to use, individually or collectively were they have decided to prepare joint local plans or development plan documents on</p>

No	General	Detailed comments	Raised by	Response
		<p>should be considered in greater detail at the next stage of the environmental assessment. Strategic issues need to be addressed</p>		<p>strategic planning issues such as waste management, transport infrastructure or large scale housing development. Local planning authorities will also commission additional research when necessary on a variety of key planning issues including assessment of the potential for renewable and low carbon energy.</p>
8	Growth	<p>Assumptions on future growth, including for housing allocations, are important when making assessments of the potential impacts of revocation of the regional strategies. An assumption that lower levels of growth (than that proposed by the Regional Strategy) may be pursued by local authorities may lessen pressures on negative regional trends. However the majority of local authorities in the South East are planning to retain the Regional Strategy figures and some authorities have already adopted Core Strategies that are in line with the Regional Strategy figures. It is possible that some local authorities may decide to increase their</p>	<p><b>Environment Agency and English Heritage</b></p>	<p>In order to better understand the content of local plans, the updated Environmental Report has taken into account local plan policies as illustrated in Appendix C on housing, pitches for gypsies and traveller sites, renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded and updated in the updated Environmental Report, including for heritage assets and river basin management plans.</p> <p>In the absence of the South East Regional Strategy, this does not mean the end of a strategic approach to planning and development plan preparation. Strategic planning will be taken forward by local planning authorities, this</p>

No	General	Detailed comments	Raised by	Response
		<p>housing figures above Regional Strategy targets which could potentially result in significant environmental effects.</p> <p>It may become more challenging to accommodate growth in certain river catchments - all available, up-to-date information should be utilised when carrying out the next stage of the assessment.</p>		<p>represents a shift towards a locally-led approach to planning for cross-boundary matters in local plans. This approach to development will be more sensitive and responsive to the character of communities, including the habitats and the natural environment of localities.</p>
9	Marine Planning	<p>The South East Regional Strategy was adopted before the marine planning process started. It therefore did not account for the role that marine planning can play, not just within the marine environment, but also on land. Many of the Sustainability Appraisal objectives could be compared to the aims of the marine planning process. It was suggested that the Marine Management Organisation be consulted at all stages of the assessment, given that their plans could potentially apply to the areas covered by this environmental assessment.</p>	<b>Environment Agency</b>	<p>The consultation on the Environmental Report was a public one and comments from all parties with an interest were welcome. The initial Environmental Report published in October 2011 and the updated Environmental Report published in October 2012 were sent to the Marine Management Organisation for comment.</p>

No	General	Detailed comments	Raised by	Response
10	Cumulative Effects	The Environmental Report should effectively assess cumulative impacts and mitigation measures of many small adverse impacts on the environment for instance on climate change including greenhouse gas emissions.	<b>Environment Agency</b>	Cumulative impacts are taken into account in the assessment presented in the updated Environmental Reports. The approach to the analysis is set out in the methodology in Section 3, and a discussion of the impacts is included in Section 4. Mitigation measures are considered throughout the updated Environmental report including for individual Strategic Environmental Assessment topics, and the retention and revocation of individual regional policies.
11	Regional Heritage Policies	English Heritage noted that some policies are only in regional strategies, not in local plans hence the risk of “policy gaps” if these regional policies are not saved. They questioned the assumption that local authorities will carry forward regional policies to secure the boundaries of Green Belts around historic settlements, and whether existing national heritage policies will be carried forward to the National Planning Policy Framework. They thought that regional heritage policies do not just	<b>Environment Agency</b>	The National Planning Policy Framework, continues to provide protection for heritage assets and designated heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, which have a degree of significance meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.

No	General	Detailed comments	Raised by	Response
		<p>repeat national policy, but include regionally specific detail. They asked for more material to be included in the historic environment baseline data.</p> <p>They considered that the revocation of the regional strategies will result in significant adverse effects which should be mitigated, in particular:</p> <p>The national/regional overview of the significance of historic assets (summarised in the Historic Environment policy) will be lost, although the National Planning Policy Framework could underline English Heritage's role in identifying historic character of more than local significance; and</p> <p>The uncertainty in relation to housing numbers could result in planning by appeal, which is more likely to be harmful to historic environment interests. Transitional arrangements should be considered.</p> <p>Many of the sub-regional policies identify sensitive the historic</p>		<p>The Government attaches great importance to Green Belts and has maintained strong protection for them in the National Planning Policy Framework. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework</p>

No	General	Detailed comments	Raised by	Response
		<p>environments of settlements and their regeneration needs. The loss of such references will affect the extent to which these issues are clearly flagged for local plan preparation work. It is vital that the PPS5 advice on understanding place and the positive contribution of heritage to regeneration is retained in the National Planning Policy Framework.</p>		<p>also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances. A change to a Green Belt boundary would need to take place through the local plan process, which would involve public consultation and an independent examination. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt</p>

No	General	Detailed comments	Raised by	Response
				<p>boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included.</p> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt.</p>
12.	<b>Site Specific Analysis</b>	Natural England thought that there needed to be more analysis of site specific issues.	<b>Natural England</b>	The updated Environmental Report includes an analysis of the content of local plans where Regional Strategy policies include the allocation of a quantum of development or land to an individual local authority or is locationally

No	General	Detailed comments	Raised by	Response
				specific.



# Representations received in response to the initial public consultation on the proposed revocation of the South East Regional Strategy

The consultation on the initial Environmental Report ran from 20 October 2011 to 20 January 2012.

The representations received on the proposed revocation of South East Regional Strategy have been summarised below. The responses are grouped under the following themes:

- The Overall Approach to Strategic Environmental Assessment;
- Assessment;
- Reliance on the National Planning Policy Framework;
- Policy Change;
- Reliance on the duty to co-operate;
- Individual Topics (covering greenbelt, gypsies and travellers, housing supply and growth, heritage, waste, biodiversity, renewable energy, transport, water, Brownfield land, the coast, flooding and woodland).

Since the responses received to the consultation of the initial report, a significant amount of policy and legislation has been developed (for instance the publication of National Planning Policy Framework and the introduction of the duty to co-operate) and so some of these comments have inevitably been overtaken by events. The comments relevant to the initial Environmental Report for the South East (i.e. responses specifically to the South East report and comments that applied to all regions including the South East) are presented in summary below, together with how they have been addressed in the updated Environmental Report.

**Table A2 Responses to the consultation on the initial Environmental Report (published in October 2011) (this table has been revised following the close of consultation on the updated Environmental Report)**

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	<b>The Overall Approach to Strategic Environmental Assessment</b>	The Environment Agency supported the broad approach to the analysis presented in the Environmental Reports published in October 2011. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns that not all the potential impacts on the historic environment were fully assessed. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.	<b>Environment Agency, Natural England and English Heritage</b>	The impact of retaining, partially revoking and fully revoking the South East Regional Strategy has been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This includes an assessment of cultural heritage – including architectural and archaeological heritage.
2	<b>The Overall Approach to Strategic Environmental Assessment</b>	The consultation on the assessment of the revocation of regional strategies which ran from October 2011 was contrary to the requirements of Article 6(5) of the Directive.	<b>Clyde and Co LLP and Icen Projects</b>	The Government disagrees that the consultation process undertaken in October 2011 was contrary to the requirements of Article 6(5) of

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>the Directive which states that the “detailed arrangements for the information and consultation of the authorities and the public shall be determined by Member States”. This requirement is transposed into English law by regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of consultation responses, demonstrates the Government’s desire to consult fully on the assessment of the impacts of revocation of the Regional Strategy.</p> <p>Section 1 of the updated Environmental Report sets out the purpose of the consultation and sets out a number of</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				questions on which the Government particularly welcomed responses.
3	<b>The Overall Approach to Strategic Environmental Assessment</b>	<b>Campaign to Protect Rural England South East</b> disagreed with the Government's view that Strategic Environmental Assessment was not necessary and therefore considered that Government was not at liberty to undertake the assessment voluntarily. The Environmental Report should have considered the need for strategic planning for the environment at a spatial tier above the individual local authority.	<b>Campaign to Protect Rural England South East</b>	<p>On 22 March 2012 in the case of Bruxelles the Court of Justice of the European Union (CJEU) considered whether the Strategic Environmental Assessment Directive applied to a procedure for the total or partial revocation of a land use plan. The Court concluded that where revocation of a plan may modify the state of the environment as examined at the time of adoption of the plan, an Strategic Environmental Assessment will be required to aid consideration of such effects.</p> <p>The updated Environmental Report assesses the retention, partial revocation and revocation of the South East Regional Strategy which includes a consideration of the</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>impact of removing regional scale environmental strategic policies.</p> <p>The updated Environmental Report was prepared in accordance with the Strategic Environmental Assessment Directive.</p>
4	<p><b>The Overall Approach to Strategic Environmental Assessment</b></p>	<p>The environmental assessment had been carried out too late in the process, and should have been conducted prior to the initial decisions to revoke the regional strategies. Strategic Environmental Assessment carried out at an early stage and with an open mind helps to identify the environmental consequences of revocation and steps which could be taken to mitigate any adverse impacts (such as saving significant environmental policies).</p> <p><b>David Lock Associates</b> considered that the Environmental Report prejudices that revocation will become policy and is not an independent analysis of real environmental impact. Consultation and consideration of the responses must be completed before a decision on revocation can be properly, and legally, made.</p>	<p><b>RenewableUK, Royal Society for the Protection of Birds, Wildlife and Countryside Link, David Lock Associates</b></p>	<p>The Government signalled its proposed intention to remove the regional tier of Government and return decision making on housing and planning to local authorities in the coalition agreement. Parliament subsequently agreed to the removal of the legal framework for Regional Strategies through the repeal of Part 5 of the Local Democracy, Economic Development and Construction Act 2009 (through section 109 of the Localism Act 2011) and gave the Secretary of State powers to revoke the whole or any part of a Regional Strategy</p>

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				<p>by order.</p> <p>Any decision to revoke the regional strategies has always been dependent on and subject to the outcome of the environmental assessments.</p> <p>The initial Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of responses, demonstrates this and is in accordance with the requirements of the Strategic Environmental Assessment Directive and its objectives.</p> <p>The outcome of the consultations on the Environmental Reports form part of the matters that are taken into account in deciding whether or not to revoke the regional strategies.</p>
5	The Overall	Wealden District Council supported one of the	Wealden	Comments noted.

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	<p><b>Approach to Strategic Environmental Assessment</b></p>	<p>principal aims of the revocation of the Regional Strategy of promoting localism and thus the use of locally derived evidence. They referred to the environmental report for the South East and commented that it confirmed the environmental and capacity concerns set out in the Regional Strategy in respect of growth, in particular, the references to air pollution, waste water capacity, water stress, and the fact that the road network was under stress in many locations with congestion acting as a brake on growth. They also noted that the Environmental Report confirmed that the Regional Strategy clearly acknowledged that wastewater treatment capacity could come under stress, depending upon the location of housing and growth. They also welcomed and supported the Report's findings that, in assessing the impacts of revocation it was indicated that it would be for local authorities to work with others to plan for and manage the water environment "taking into account biodiversity sites of international importance".</p> <p><b>Basingstoke and Deane District Council</b> also supported the principle of allowing local authorities to have more freedom to respond to</p>	<p><b>District Council, Basingstoke and Deane Borough Council</b></p>	

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		local needs and preferences in their decisions both through development plans and on individual planning applications.		
6	<b>The Overall Approach to Strategic Environmental Assessment</b>	The <b>Town and Country Planning Association</b> were concerned that the Environmental Reports did not represent an analytically robust and rigorous assessment of the likely impacts or how they may be mitigated. They considered that not all of the Directive's provisions had been addressed with sufficient robustness to provide an appropriate means of assessment, with, for example, reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The Environmental Reports did not explore the potential short-term impacts that could arise in the interim period while the Regional Strategy is revoked, but before adopted local plans are in place. The reports do not project what the future might be like under local plans prepared with a minimum of national guidelines. The reports should contain more analysis of minerals and waste, infrastructure, town centre development, new settlements and major urban expansions.	<b>Town and Country Planning Association, David Lock Associates</b>	The October 2011 Environmental Report was structured around the individual requirements of the Strategic Environmental Assessment Directive.  Section 1 (Table 1.2) of the updated Environmental Report sets out how the report (and appendices) address the requirements of the Directive. Section 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation. Section 3 of the updated Environmental Report sets out the approach taken to complete the assessment. This



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				includes the assessment scope, covering the topics included, the spatial extent of effects considered and the definitions of short, medium and long term timeframes employed. Appendix E sets out the collated contextual and baseline information, on a topic-by-topic basis, for each of the 10 assessment topics (including evolution of the baseline).
7	<b>Assessment – likelihood of effects</b>	The assessment had placed unquestioning faith in the environmental benefits of the Government’s planning reforms, and seemed to be a justification for revocation rather than objective analysis. The assumptions within the Environmental Report that revocation of the Regional Strategy will have no significant adverse environmental effects were untested and unsupported by evidence.	<b>Hives Planning Ltd; Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b>	The short, medium and long term impacts of retaining, partially revoking and revoking the South East Regional Strategy have been assessed in detail in the updated Environmental Report for each of the 12 Strategic Environmental Assessment topics.
8	<b>Assessment – cumulative impacts</b>	The Environmental Report should assess the cumulative effects of revocation, in particular the consequent capacity for ‘linked or cumulative,	<b>Clyde and Co LLP; Levett-Therivel;</b>	Section 3 of the updated Environmental Report sets out the assessment methodology

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		synergistic or secondary effects' coupled with the need for environmental assessment to adapt to the scale and nature of the plan in question. The assessment should include a consideration of the impact of the revocation of all the Regional Strategies.	<b>Treweek Environmental Consultants; Collingwood Environmental Planning</b>	for cumulative, synergistic or secondary effects. Section 4 contains a consideration of these effects. Appendix D presents the specific consideration of the short, medium and long term effects of revocation and retention of all 179 South East Regional Strategy policies.
9	<b>Assessment – mitigation</b>	No mitigation measures are presented in the environmental reports because no impacts have been identified. Every section or policy of the Regional Strategy except one (the core spatial strategy) Annex A of the Environmental Report stated that 'These policies could be delivered by other means than through a regional strategy.' However, no evidence had been provided to show that this would actually take place.	<b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b>	Where significant effects have been identified appropriate mitigation measures are proposed in Section 4 of the updated Environmental Report, as well as in Appendix D.
10	<b>Assessment – strategic planning</b>	The Regional Strategies provided strategic policies to ensure that development can be planned in a way that is compatible with biodiversity targets. There are similar issues with water supply/demand, for example, under the Water Framework Directive, to ensure that housing development will be compatible with the	<b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental</b>	The National Planning Policy Framework, published in March 2012, states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to

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		<p>requirements for favourable status and there are knock-on implications for European protected sites.</p> <p>The <b>Town and Country Planning Association</b> considered that the Environmental Reports understated the benefits of regional policy which all the original Strategic Environmental Assessments had identified. They also considered that there was insufficient detail to show how the new planning reform measures would deal effectively with strategic spatial issues.</p>	<p><b>Planning; Town and Country Planning Association</b></p>	<p>deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>The impacts of retaining, partially revoking and revoking the South East Regional Strategy have been assessed in detail in the short, medium</p>

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				and long term for each of the 12 Strategic Environmental Assessment topics.
11	<b>Assessment - baseline data</b>	Statutory Agencies identified more recent environmental data than that used in the Environmental Reports - such as data used to inform the preparation of the River Basin Management Plans, and on climate change and sea level rise. Other respondents asked for other baseline data to be updated, for data on human health to be included and for data to better reflect the economic climate. Some respondents asked for maps to be included to better illustrate spatial impacts.	<b>Natural England, Environment Agency, Trewick Environmental Consultants (TEC), Clyde and Co LLP, Town and Country Planning Association, Levett-Therivel</b>	The baseline data has been updated and expanded in the updated Environmental Report, and described for the 12 Strategic Environmental Assessment topics in Appendix E. Maps have been included. This data has been used to inform the assessment the strategic environmental impacts of the revocation of the South East Regional Strategy and a number of alternatives.
12	<b>Assessment – material assets</b>	The analysis of material assets could include the full range of infrastructure, employment sites, waste, energy and water use etc.	<b>Levett-Therivel; Trewick Environmental Consultants</b>	The updated Environmental Report includes an assessment of all 12 Strategic Environmental Assessment topics. This incorporates assessment of waste and minerals, energy, water use, and employment. The impact of infrastructure on the Strategic

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				Environmental Assessment topics is considered throughout the assessment at Appendix E of the updated Environmental Report
13	<b>Assessment – likely evolution of the environment</b>	The likely evolution of the environment in the absence of the plan should be set out.	<b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b>	In compliance with Annex 1(b) of the Strategic Environmental Assessment Directive, the updated Environmental Report presents for each of the 12 Strategic Environmental Assessment topics, an assessment of the likely evolution of the baseline without implementation of the plan or programme. Uniquely (to date) in this case, “without implementation of the proposed plan or programme” actually refers to the plan to revoke the Regional Strategy. So the evolution of the environmental baseline without the plan will mean in this instance, the evolution of the baseline with the retention of the existing

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				Regional Strategy in place. Therefore, and where appropriate in addition to using projections, this assessment has used the findings of the relevant sustainability appraisal and appropriate assessment to help provide an informed understanding of the likely future evolution of the baseline. This information is contained in Appendix E and presented within each topic chapter.
14	<b>Assessment – SPAs and SACs</b>	Information on the existing impacts on SPAs and SACs should be provided.	<b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b>	The updated Environmental Report contains an Appendix G listing all Special Areas of Conservation and Special Protection Areas and the impact on particular sites has been drawn out where relevant.
15	<b>Assessment – method statement</b>	Information should be provided on who has carried out the assessments, details of the consultation with statutory agencies, responses to scoping responses and what problems were faced.	<b>Levett-Therivel; Treweek Environmental Consultants;</b>	Detail of the preparation of the report, consultation with the statutory agencies, responses to scoping comments, and difficulties faced with the

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			<b>Collingwood Environmental Planning</b>	analysis are set out in sections 1 and 3 and Appendix F of the updated Environmental Report.
16	<b>Assessment – non technical summary</b>	The non- technical summaries are not consistent with the Strategic Environmental Assessment Directive requirements. They are generic and make assertions that are not based on evidence.	<b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b>	A non-technical summary which is based on the findings of the assessment and consistent with the requirements of the Strategic Environmental Assessment Directive is included in the updated Environmental Report.
17	<b>Assessment – local plans</b>	<p><b>The Woodland Trust</b> thought that the baseline information in the original Strategic Environmental Assessment of the Regional Strategy identified increasing environmental pressures arising from development. It felt these still needed to be addressed in the absence of the strategy. As a result of this, they believed there should be much more emphasis on the Strategic Environmental Assessment process for Development Plan Documents, with particular emphasis on the effect of cumulative impacts.</p> <p><b>Campaign to Protect Rural England</b> stated that the reports should have considered appropriate evidence that currently exist, such as changes to</p>	<b>The Woodland Trust, Friends of the Earth, CAMPAIGN TO PROTECT RURAL ENGLAND, Professor Alan Townsend,</b>	<p>The Government agrees that Local Plans are subject, and will continue to be subject, to Strategic Environmental Assessment consistent with the requirements of the Strategic Environmental Assessment Directive.</p> <p>Local authorities' planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements including on the</p>

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		<p>Core Strategies made subsequent to the announcement that regional plans would be abolished. They suggested that no such assessment had been made. As a result there were no recommendations about how the plan making process might be improved to address environmental issues, for example, by strengthening the Sustainability Appraisal process at local authority level.</p> <p><b>Friends of the Earth</b> were concerned that the statement in the Environmental Reports that local authorities would deal with environmental issues was not based on a full analysis of whether local plans do have strong local environmental policies in place similar to those in the Regional Strategies in a situation where they were specifically not supposed to duplicate regional policy; or in areas where there are no local plans. In addition, the assumption that there are 'strong protections' for the environment in national planning policy had been disputed by several NGOs.</p> <p><b>Professor Alan Townsend</b> considered the reference in the reports that the removal of the Regional Strategies would create 'opportunities for securing environmental benefits' to be</p>		<p>environment.</p> <p>The updated Environmental Report includes an analysis of the content of local plans at Appendix C, focussing on housing allocation, gypsies and traveller pitches, renewable energy, employment land, minerals and waste.</p>



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		<p>unfounded. Referring to the North East, as an example, he commented that the experience of <b>Campaign to Protect Rural England</b> was that economic and commercial pressures would act as a serious threat to a balanced approach to the environment and to development. He also referred to paragraph 1.25 in the October 2011 Environmental Report where it is stated that environmental effects cannot be predicted for certain because they depend on local decisions, but disagreed with the view that decisions taken locally will look to maximise positive environmental outcomes for the local area.</p>		
18	<b>Assessment – reasonable alternatives</b>	<p>The environmental assessment had considered too narrow a range of alternatives. The only alternative considered was no revocation. This in turn means that there are no clear recommendations to address the practical question of whether the proposed planning system, centred on the National Planning Policy Framework and local plans, should be modified to address environmental issues that arise from the abolition of regional planning.</p> <p>Other alternatives suggested were:</p>	<p><b>Royal Society for the Protection of Birds, Wildlife and Countryside Link, Campaign to Protect Rural England, Renewable UK, Clyde and Co LLP, Irish</b></p>	<p>The updated Environmental Report draws on the consultation responses and the findings of the assessment to develop a number of alternatives and identifies three reasonable alternatives to complete revocation for assessment. Section 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for</p>

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		<ul style="list-style-type: none"> <li>• reviewing the Regional Strategies;</li> <li>• revoking the Regional Strategies but saving key policies;</li> <li>• the retention of the Regional Strategy system with regional groupings of local authorities responsible for drafting them and adoption by the Secretary of State;</li> <li>• maintaining the plans and revising certain policies in order to make the plans more acceptable, as well as the possibility of local authorities producing joint development plans to cover specific issues;</li> <li>• revoking certain chapters or parts of the strategies and introducing transitional arrangements.</li> </ul>	<b>Travellers Movement in Britain; Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning; David Lock Associates.</b>	the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation.
19	<b>Assessment - monitoring</b>	<b>Natural England, Campaign to Protect Rural England and Town and Country Planning Association</b> considered that it was not clear whether the local authorities, Government or any other body would collate the authorities' monitoring information and assess it to determine	<b>Natural England, Campaign to Protect Rural England, Town and Country</b>	Proposals for monitoring are set out in section 5 of the updated Environmental Report.

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		<p>where more than local gaps in policy or problem areas were arising.</p> <p>The <b>Town and Country Planning Association</b> suggested that there was a need to monitor the general impact of the Government's planning changes. Consistent and effective monitoring on the effects of the 'Duty to Co-operate' over the next 2-3 years was particularly important, for example, by tracking local plan progress on local authority websites in a systematic but simple way. This was particularly important in the South East.</p> <p><b>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b> suggested that the effects of revocation should be monitored, for example, to track housing completions and development on Greenbelt.</p> <p><b>Clyde and Co LLP</b> considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p> <p>The <b>Forestry Commission</b> commented that the monitoring and sharing of information was far easier with the Monitoring Group established by the Regional Assembly. Local authorities were unlikely to monitor if this is not a requirement</p>	<p><b>Planning Association, Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning, Clyde and Co LLP, Forestry Commission</b></p>	

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		<p>given funding constraints. The Annual Monitoring report was extremely valuable for seeing what was being achieved, and believed that it was unclear now how national targets for carbon reduction could be met. Whilst Local authorities may be responsible for monitoring: they asked who they reported to and how (a) cumulative effects or (b) actions in one authority being undermined in another could be assessed.</p>		
20	<p><b>Reliance on the draft National Planning Policy Framework</b></p>	<p><b>Natural England, the Environment Agency, the Town and Country Planning Association, Campaign to Protect Rural England and Kent County Council</b> noted that it was difficult to come to a view on the significance of the environmental effects of revocation, prior to the publication of the final National Planning Policy Framework and the implementation of the new "Duty to Co-operate". <b>Campaign to Protect Rural England</b> for example, commented that as a result of the wider changes in planning it was inherently difficult to assess the likely impact of the revocation of Regional Strategies. In particular, the content of the final National Planning Policy Framework and future local plans were uncertain and neither of these statements could currently be fully tested. They expressed</p>	<p><b>Natural England, Environment Agency, Town and Country Planning Association Campaign to Protect Rural England, Kent County Council, Levett-Therivel; Treweek Environmental Consultants; Collingwood</b></p>	<p>The National Planning Policy Framework was published in March 2012. The National Planning Policy Framework is consistent with the Government's Natural Environment White Paper, and makes it clear that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and sets out as a core planning principle that planning should recognise the intrinsic character and beauty of the countryside. The Framework also maintains</p>

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		<p>concern that the Environmental Reports did not give a comprehensive overview of the potential environmental impact of the Government's intentions.</p> <p><b>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</b> questioned the evidence that the National Planning Policy Framework will be so favourable to the environment or sustainable development, as the National Planning Policy Framework has not been subject to Strategic Environmental Assessment.</p> <p>The <b>Woburn Sands and District Society</b> was broadly supportive of the principles of the Localism Bill and the revocation of the East of England and South East Regional Strategies. They questioned the conclusion of "highly unlikely that there would be any significant adverse environmental effects resulting from the revocation" given the draft National Planning Policy Framework. They considered that the Environmental Reports did not assess the significant changes resulting from the National Planning Policy Framework which meant that the reports were fundamentally flawed. The assessment only appeared to consider the</p>	<p><b>Environmental Planning, Woburn Sands and District Society, Campaign to Protect Rural England South East, Jerry Hyman,</b></p>	<p>protection for designated areas such as the Green Belt, Areas of Outstanding Natural Beauty, National Parks, and Sites of Special Scientific Interest. It sets out policy for the support of delivery of renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The National Planning Policy Framework is not subject to Strategic Environmental Assessment as it is high level policy and does not fall within the scope of the Strategic Environmental Assessment Directive.</p>

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		<p>environmentally friendly aspects of the draft National Planning Policy Framework while ignoring those which would have a significant and material adverse impact on the environment.</p> <p><b>Natural England</b> agreed with the assessment that there was an inherent difficulty in providing an assessment of the National Planning Policy Framework as an alternative, as it was not known how the final version would differ from the consultation draft.</p> <p><b>Scottish Power Renewables</b> were of the view that the Regional Strategies have a key role in ensuring that national policy objectives are met and encouraged the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the regional plans do and could continue to play a key role in the strategic planning of onshore wind and the infrastructure to support the development of offshore wind. They were therefore concerned that the process for the revocation of Regional Strategies pre-empted the final National Planning Policy Framework and requested that the Government require local authorities to put in place policies to ensure a contribution to the</p>		

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		<p>national renewable energy targets, in line with the National Policy Statement.</p> <p><b>RenewableUK</b> shared the concern about the reliance on the draft National Planning Policy Framework and were concerned that the draft National Planning Policy Framework did not contain a sufficient level of detail to support renewable energy planning.</p> <p>The <b>Royal Society for the Protection of Birds</b> and <b>Wildlife and Countryside Link</b> considered it misleading for the Environmental Reports to imply that the planning reform would usher in new policies that, on balance, would make up for the loss of Regional Strategies. They considered, for example, that even though 'top-down' housing targets were being removed, the stated purpose of planning reform was to create more growth and to deliver more housing. There was no criticism of Regional Strategy housing figures being too high, only that they were 'top-down'. It therefore followed that local authorities would use similar methodologies and arrive at similar figures when 'objectively assessing' housing need.</p> <p><b>Friends of the Earth</b> stated that local authorities will have to be guided by the policies in the National Planning Policy Framework. Based on</p>		

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		<p>the draft National Planning Policy Framework text, in many cases, local authorities will struggle to take decisions on a 'local' basis to protect the environment. They stated that legal advice obtained by them showed that the concept of local decision-making was outweighed by the wording used in the draft National Planning Policy Framework which is directive on the need to approve development. They also pointed to shortcomings in the draft National Planning Policy Framework on sustainable development, countryside and biodiversity, transport, water, and climate change mitigation and adaptation.</p> <p>The <b>Wildlife and Countryside Link</b> were concerned that the Environmental Reports relied so heavily on the draft National Planning Policy Framework, which had not been finalised and was therefore subject to change.</p> <p><b>The Theatres Trust</b> suggested that suitable policy within the National Planning Policy Framework and other measures needed to be in place to ensure the pooling of knowledge on physical and social cultural infrastructure, particularly theatres, if the plans are revoked.</p> <p>The <b>Woodland Trust</b> commented that the</p>		



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		<p>Strategic Environmental Assessment implies that the National Planning Policy Framework and planning reform in general will lead to less development, particularly in the absence ‘top down targets’, but felt this is contradictory to the Government’s policy, as the stated purpose of the current planning reforms is to encourage economic growth. Paragraph 1.6 of the Environmental Report states that the National Planning Policy Framework sits within the broader context of national policy and legislation such as the National Environment White Paper (NEWP). The draft National Planning Policy Framework did not however reflect the NEWP.</p> <p><b>Campaign to Protect Rural England South East</b> referred to statements in the Environment Report that the National Planning Policy Framework would have the same effect as the policies in the South East Plan. They commented that the National Planning Policy Framework could not deliver what the Government stated is intended without considerable changes.</p> <p><b>Jerry Hyman of JC Consultants</b> considered that the Environmental Report for the South East did not recognise the ‘crash’ in Dartford Warbler population, and it failed to ‘identify the primary</p>		

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		<p>constraint of the Thames Basin Heaths SPA among the “environmental conditions of strategic significance”. He questioned the comment in the Environmental Report that the National Planning Policy Framework would maintain existing environmental protections. He also considered that the report completely misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p>		
21	<b>Assessment - policy change</b>	<p><b>Natural England</b> noted that the revocation of the Regional Strategies would require local planning authorities to incorporate relevant environmental policies, previously included in the Regional Strategy, into their local plans or to rely on National Planning Policy Framework policies. The full effect of revoking individual Regional Strategy policies was therefore likely to depend greatly on where individual local authorities were in their local plan-making process. Where local</p>	<p><b>Natural England, The Environment Agency, Royal Society for the Protection of Birds, Wildlife and Countryside Link, Theatres</b></p>	<p>The National Planning Policy Framework sets out the Government’s planning policies for England.</p> <p>The National Planning Policy Framework emphasises the need for local planning authorities to plan strategically. The National Planning Policy</p>

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		<p>authorities had not yet adopted core strategies, in the absence of regional strategies, they considered that it may be much more difficult for them to develop locally tailored evidence-based policies.</p> <p><b>The Environment Agency</b> welcomed the Environmental Report highlighting which parts of current national policy and guidance were important to help avoid significant adverse environmental impacts. Where local authorities had adopted Core Strategies that were developed with a backdrop of the Regional Strategy, a robust National Planning Policy Framework would need to ensure that any potential policy gaps were filled.</p> <p>The <b>Royal Society for the Protection of Birds</b> proposed that the Government should not revoke the Regional Strategies in full. They suggested that saving key environmental policies until they were replaced by equivalent local plan policies would significantly mitigate the risk of environmental harm. Saved policies should be kept in place during a transitional period while local plans were updated, which could easily coincide with the transitional period in which the National Planning Policy Framework was</p>	<p><b>Trust, RenewableUK, Friends of the Earth, Wealden District Council, Kent County Council, Chichester District Council, Basingstoke and Deane Borough Council, Cherwell District Council, David Lock Associates, Jeremy Hyman.</b></p>	<p>Framework states that local planning authorities should set out their strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

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		<p>translated into local plans.</p> <p>The <b>Wildlife and Countryside Link</b> suggested that Government and its agencies should work together with local authorities and their partners in each region to identify which Regional Strategy policies should be saved, while local plans were updated to incorporate those policies.</p> <p>The <b>Royal Society for the Protection of Birds</b> and the <b>Wildlife and Countryside Link</b> considered that revocation would remove a raft of policies on issues, such as those on the natural environment and renewable energy, that were largely non-contentious, and the product of close cooperation between local authorities and other interested parties.</p> <p>The <b>Theatres Trust</b> stated that the proposed revocation of the Regional Strategies could have adverse social effects. The Regional Strategies included measures for local authorities to work collaboratively 'to increase investment in physical and social infrastructure'. This may not take place on such a scale, even with the Duty to Co-operate, if Regional Strategies are revoked. The Theatres Trust believes that this would have ensured that cultural facilities were in place for communities to share and that places exchange</p>		<p>The National Planning Policy Framework also makes clear that, where it would be appropriate and assist the process of preparing or amending Local Plans, Regional Strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of Regional Strategies to support their Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>Responding to climate change is one of the core land use planning principles which the National Planning Policy Framework expects should underpin both plan-making and decision-taking. Local planning authorities are expected to</p>

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		<p>knowledge when creating new buildings or networks, so that resources were not squandered by the repetition of mistakes. Thus, it was suggested that measures needed to be in place to ensure the pooling of knowledge on physical and cultural infrastructure, which also affect theatres, if the Regional Strategy is revoked.</p> <p><b>RenewableUK</b> were of the view that the revocation of the Regional Strategies would create a policy gap which would affect the ability of local authorities to make informed decisions. They did not believe that a reliance on national policy and the Duty to Co-operate was sufficient to ensure that the UK met its renewable energy generation and carbon emissions reduction targets.</p> <p><b>Friends of the Earth</b> were concerned that the Strategic Environmental Assessments of the revocation of the Regional Strategies do not fully assess the environmental impacts of the incoherent policy context that would arise. They recommended that to fill the gap left by the Regional Strategies, local plans should absorb the regional evidence bases for renewable energy resources, and 'save' renewable energy target and adaptation policies where this would</p>		<p>adopt proactive strategies to mitigate climate change and co-operate to deliver strategic outcomes which include climate change. They should plan for new development in locations and ways which reduce greenhouse gas emissions (including through transport solutions which support reductions in greenhouse gas emissions); actively support energy efficiency improvements to existing buildings; and promote energy from renewable and low carbon sources. These strategies are expected (paragraph 94 of the National Planning Policy Framework) to be in line with the objectives and provisions of the Climate Change Act 2008. There is a legal requirement on local planning authorities to ensure their Local Plan (taken as a whole) includes policies designed to tackle climate</p>

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		<p>otherwise leave a gap in local frameworks. They added that the loss of the Regional Strategy left a gap in the consideration of the global impacts of a local authority's areas consumption/ indirect impacts. They were of the view that the footprint approach at a regional level specifically aimed to counter a strictly localist approach of local authorities. They were concerned that local authority plans would only consider local resource management and the whole footprint approach would be lost. They considered it essential that the evidence base section of the draft National Planning Policy Framework was revised to include the concept of foot printing to acknowledge the burden of resource use within a local authority on other areas. They therefore recommended that local authorities 'save' relevant policies where this would plug a gap in their existing local planning framework until the next appropriate review date; and DCLG should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary co-operation.</p> <p><b>Wealden District Council</b> urged that the ultimate timing and manner of any revocation of the Regional Strategy should not further worsen</p>		<p>change and its impact. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.</p>

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		<p>concerns that have been widely expressed regarding the creation of a policy void. Nor should it have any further adverse impacts upon the production and adoption of Core Strategies by local planning authorities. They sought clear transitional arrangements to be put in place for instance where development of Core Strategies had reached advanced or post adoption stages.</p> <p><b>Town and Country Planning Association</b> considered that the Environmental Report's overall conclusion was that there would be significant environmental benefits from revocation of the South East Regional Strategy. However, this does not consider the Regional Strategy's strategic environmental policies tailored to distinct South East situations. They considered it regrettable that there was no intention to 'save' environmental impact policies specific to the region.</p> <p><b>Kent County Council</b> commented that the coverage of local plans is in part out of date and is not complete. A period will therefore exist before up-to-date local plan coverage is complete during which the loss of South East Plan policies may create a policy vacuum in some areas.</p> <p><b>Chichester District Council</b> was also concerned</p>		

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		<p>about policy voids such as the absence of a housing target in the period between the abolition of the South East Plan and the adoption of the Chichester Core Strategy, as well as specific comments relating to each of the Strategic Environmental Assessment topics.</p> <p><b>Basingstoke and Deane Borough Council</b> considered that if transitional arrangements were not in place prior to the adoption of the Core Strategy, it may leave some policy areas without policy/guidance in the short term. <b>Cherwell District Council</b> expressed similar concerns about a policy gap and that the absence of transitional arrangements could weaken the policy position and hence local authority control over development proposals and their impact on the environment.</p> <p><b>David Lock Associates</b> stated that it is unrealistic to assume that there are existing local plan policies that adequately cover housing, environmental protection, transport, infrastructure, economic development, agriculture, minerals, energy and waste as well as sub-regional policies. It is also unrealistic to assume that local planning authorities will be able to generate appropriate policies to fill the void left</p>		



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		<p>by revocation within a timely fashion given existing workloads and reduced budgets.</p> <p><b>Jerry Hyman</b> of JC Consultants objected strongly to the proposal to revoke the South East Regional Strategy because of concern about the Dartford Warbler, an internationally-protected species. He considered the consultation to be premature on the grounds that conducting an environmental assessment of the effect of revocation was entirely dependent upon the details within the National Planning Policy Framework. Until the National Planning Policy Framework was published and examined, it was not possible to ascertain the likely effect of revocation, retention or modified retention. In particular, the impact of revocation on the natural environment and rare species such as the Dartford Warbler.</p>		
22	<p><b>Reliance on the Duty to Co-operate</b></p>	<p><b>Natural England</b> and the <b>Environment Agency</b> welcomed the emphasis given to cross boundary working which could potentially promote partnership working and offer a more strategic approach to spatial planning. However, both organisations commented that the Environmental Reports did not identify how the Duty to Co-</p>	<p><b>Natural England Environment Agency, English Heritage, Royal Society for the</b></p>	<p>The Government recognises the importance of strategic planning. The National Planning Policy Framework, published in March 2012, makes clear that strategic priorities across local</p>

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		<p>operate would work in practice or replace the co-ordination provided by the regional strategies and the various working groups that existed within this structure. <b>Natural England</b> also considered that there was too much reliance on the assumption that local planning authorities would continue to work together on strategic issues under the Duty to Co-operate. It was noted that the Duty would not apply to private sector companies who provide public services such as water and sewerage, energy and telecommunications, many of which would have a key role to play in infrastructure planning. The <b>Environment Agency</b> stated that common intelligence and joint working arrangements were needed between partner local authorities and other key organisations to develop an integrated approach to planning.</p> <p>The <b>Environment Agency</b> referring to the Duty to Co-operate accepted that local authorities would work with adjacent councils, but not at a range of scales including a catchment scale. They considered that this was important as building development at the top of a catchment could increase run-off and cause flooding many miles downstream. They suggested that this is</p>	<p><b>Protection of Birds, RenewableUK, Town and Country Planning Association, Friends of the Earth, Clyde and Co LLP, Professor Alan Townsend, Campaign to Protect Rural England, Luton Borough Council, Hertfordshire County Council, Basingstoke and Deane Borough Council, Campaign to Protect Rural England South</b></p>	<p>boundaries are properly co-ordinated and clearly reflected in individual local plans.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The Duty to Co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and</p>

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		<p>recognised so that the Duty to Co-operate could fully support strategic planning at a local level.</p> <p><b>Natural England</b> accepted that it was possible that cross-boundary impacts may be assessed between adjoining authorities, but were unclear how the cumulative impacts of multiple authorities' plans would be assessed to take into account issues occurring within broader environmental boundaries, such as water catchments. Both the <b>Environment Agency</b> and <b>Natural England</b> sought further clarification on mechanisms which could be employed to ensure that likely cumulative, in-combination and cross-boundary environmental impacts, are identified, assessed and monitored as part of the Local Plan process and Duty to Co-operate.</p> <p><b>English Heritage</b> noted how critical it was that the Duty to Co-operate was taken forward by local authorities and public bodies to ensure that the strategic planning issues are successfully addressed, based on a shared understanding of local needs and the wider context. However, they saw a danger that the wider perspective gained through strategic planning would be lost. They suggested that the National Planning Policy Framework and any guidance issued to support</p>	<p><b>East</b></p>	<p>deliverable on cross-boundary matters. The Duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the Duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger Duty requires councils to demonstrate how they have complied with the Duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint</p>

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		<p>it; may assist with this by encouraging strategic analysis through sub-national partnerships in appropriate circumstances.</p> <p>While the <b>Royal Society for the Protection of Birds</b> welcomed the strengthening of the Duty to Co-operate during its Parliamentary passage, they remained sceptical that the Duty would deliver contentious forms of development where it is needed or effective strategic planning for the natural environment. They were concerned by the unsubstantiated assumption that the Duty to Co-operate would overcome the strategic vacuum left by the revocation of the Regional Strategies. They stated, as an example, that there was no recognition of the shortcomings caused by having multiple plans being developed over multiple time and spatial scales, and the difficulties this would cause in terms of assessing the cumulative impacts of development.</p> <p><b>RenewableUK</b> also expressed the view that the Duty to Co-operate provisions in the Localism Act appear weak, with no clear means of ensuring that local authorities would co-operate productively. They considered that a lack of strategic action on mitigation and adaptation to climate change was likely to result in significant</p>		<p>infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities might not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such they may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may</p>

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		<p>and unpredictable effects on biodiversity, flora and fauna. Other elements, such as population, human health etc. would also be adversely affected.</p> <p>The <b>Town and Country Planning Association</b> indicated that it had made clear that the Duty to Co-operate had a range of significant limitations - having a narrow remit, a retrospective sanction and no defined or specific outcomes. They considered that even where joint cooperation was enthusiastically entered into by local authorities the nature of cooperation would be on a smaller spatial scale and with a tighter remit and much less resource efficient than the statutory Regional Strategy process. They considered that this may lead to increased environmental impacts and may limit effective responses on renewable energy and catchment scale or coastal flood risk. They considered that the Environmental Report for the South East, while making many references to the 'Duty to Co-operate' and inter-authority collaboration, did not mention cooperation across the London boundary. They saw this as a potentially serious weakness for effective planning in those parts of the South East near London.</p>		<p>also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the Duty to Co-operate.</p> <p>In recognition of the breath of bodies involved in effective strategic planning, the Duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The bodies, which are listed in local plan regulations, are:</p> <ul style="list-style-type: none"> <li>• the Environment Agency;</li> <li>• the Historic Buildings and Monuments Commission for England;</li> <li>• Natural England;</li> <li>• the Mayor of London;</li> <li>• the Civil Aviation Authority;</li> </ul>

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		<p>In addition, the <b>Town and Country Planning Association</b> considered that national policy does not address regional and sub-regional issues specific to the South East economy and its drivers, nor the relationship in labour market terms between economic growth and housing. They saw these as having environmental implications. They added that the Duty to Co-operate and potential role of Local Economic Partnerships within the South East region take no account of relationships within London, including the element of housing demand from Londoners moving out. There was no ‘wider London region’ assessment. The effectiveness of the potential Local Enterprise Partnership role also needed to be considered against the Local Enterprise Partnership geography in the region, which was very variable and only partly reflected ‘real’ or ‘functional’ economic areas.</p> <p><b>Friends of the Earth</b> considered that revocation would leave a gap in both planning policy on environmental issues and in a regional understanding of them. They considered that the Duty to Co-operate was unlikely to provide an effective response to the wider pattern of</p>		<ul style="list-style-type: none"> <li>• the Homes and Communities Agency;</li> <li>• Primary Care Trusts;</li> <li>• Marine Management Organisation</li> <li>• Office for Rail Regulation</li> <li>• the Highways Agency;</li> <li>• Transport for London;</li> <li>• Integrated Transport Authorities; and</li> <li>• Highway authorities</li> </ul> <p>The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning Policy Framework states that local planning authorities should set out the strategic priorities for</p>

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		<p>unsustainable pressures and growing regional inequalities in England. They suggested that the Duty does not require co-operation on any specific issues. Issues which are by their nature spatial and cross-boundary, for example, river basin management, flood risk, green infrastructure, and transport, would suffer from the removal of the Regional Strategy. While, for example, river basin management plans are developed by the Environment Agency, local authorities and others, the context for local decision-making on planning applications will still lack regional spatial awareness of the larger than local and cumulative impacts of decisions. This will lead in many cases to poor planning, and increased negative environmental impacts. They were concerned that there are no sanctions for local authorities who fail to co-operate, while local authorities who have failed to persuade neighbouring authorities to co-operate would suffer if the Inspector judged their plan to be unsound as a result.</p> <p><b>Clyde and Co LLP</b> considered that it was not adequate to base the environmental assessment on the expectation that authorities would co-operate. It was therefore inappropriate for the</p>		<p>their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

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		<p>assessment of likely effects, as encapsulated within the Environmental Reports, to be predicated on that basis.</p> <p>Another consultee (<b>Professor Alan Townsend</b>) suggested that a number of policy areas would be under threat from relying on the Duty to Co-operate, such as, climate change, river flooding, AONBs, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing. <b>Hives Planning Ltd</b> commented that the Localism Act did not set out any sanctions if local authorities did not co-operate.</p> <p><b>Campaign to Protect Rural England South East</b> considered that the revocation of the South East Regional Strategy would remove all strategic spatial planning in the South East, because the only “mitigation” measure was an undefined and unproven ‘Duty to Cooperate’. They considered that this fundamentally changed the approach to planning and removed the ability to make good strategic spatial decisions concerning transport, infrastructure, housing and commercial development with respect to their effects on the environment. Referring to Policy SP-1 they considered that the only way to mitigate the resulting loss of environmental oversight within</p>		



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		<p>existing legislation would be to monitor and as necessary revise the Duty to Co-operate. They suggested that one mitigation measure would be to require Local Enterprise Partnerships to consult and/or engage with environmental stakeholders on any development or infrastructure proposals in the Local Enterprise Partnership area. Another would be to require Local Enterprise Partnerships to undertake environmental assessments. On Policy NRM1, (Sustainable water resources and groundwater quality), they considered that the statutory weight of the Defra strategy (Water for Life) should be strengthened and reflected in Ofwat statutory guidance to the water industry.</p> <p><b>Basingstoke and Deane Borough Council</b> commented that with the Duty to Co-operate the revocation of the South east Plan should not result in the loss of planning at a strategic level nor lead to significant adverse environmental effects within the wider region.</p>		
23	<b>Individual Topics - Access to Data</b>	<p>Referring to the comment in the Environmental Reports that local authorities can continue to draw on available information, including data from partners, to address cross-boundary issues, the <b>Town and Country Planning Association</b></p>	<b>Town and Country Planning Association</b>	The National Planning Policy Framework, published in March 2012 makes it clear that local planning authorities may continue to draw on evidence

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		<p>stated it was not clear whether data previously collated as part of the Regional Strategy preparation process would remain up-to-date, or whether coordinated monitoring mechanisms would continue to exist in the future</p>		<p>that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.</p>
24	<p><b>Individual Topics -Green Belt</b></p>	<p><b>JC Consultants</b> considered that the Environmental Report misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p> <p><b>Hives Planning Ltd</b> suggested that the comment that there would be less pressure to review Green Belt boundaries in order to accommodate necessary growth, resulting in lower</p>	<p><b>JC Consultants, Hives Planning Ltd, CRPE.</b></p>	<p>The National Planning Policy Framework makes it clear that the Government attaches great importance to Green Belts, and overall that the planning system should recognise the intrinsic character and beauty of the countryside. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their</p>

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		<p>environmental impacts, was misleading. They added that Green Belt boundaries were established many years ago and it was clearly recognised in policy documents in the last decade that Green Belt boundaries must be reviewed in order to accommodate the inevitable need for housing.</p> <p><b>Campaign to Protect Rural England</b> commented on the statement in the Environmental Report that “the revocation of top-down housing targets will remove pressure to review Green Belt to accommodate growth” and that it is now up to local authorities to review their Green Belt boundaries. They felt the assertion that the Green Belt would be ‘safer’, was debatable. They took the view that this was based on the National Planning Policy Framework making clear that a key objective of the planning system is to increase significantly the delivery of new homes; and therefore the tenor of wider Government policy (for example the New Homes Bonus) is that local authorities will be under greater pressure than before to provide new housing. Local authorities would therefore be obliged to “maintain a rolling supply of deliverable sites sufficient to provide five years</p>		<p>permanence. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> <li>(i) to check the unrestricted sprawl of large built-up areas;</li> <li>(ii) to prevent neighbouring towns merging into one another;</li> <li>(iii) to assist in safeguarding the countryside from encroachment;</li> <li>(iv) to preserve the setting and special character of historic towns; and</li> <li>(v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to</p>

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		<p>worth of housing .....the supply should include an additional allowance of at least 20%..." (draft National Planning Policy Framework, clause109).</p> <p><b>Campaign to Protect Rural England South</b> disagreed that the environmental protection of the Green Belt may be better when the South East Regional Strategy is revoked (policy SP5). They considered that local authorities were already showing less regard for the Green Belt.</p>		<p>enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p>If proposing a new Green Belt, local planning authorities should: demonstrate why normal planning and development management policies would not be adequate; set out whether any major</p>

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				<p>changes in circumstances have made the adoption of this exceptional measure necessary; show what the consequences of the proposal would be for sustainable development; demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and show how the Green Belt would meet the other objectives of the National Planning Policy Framework .</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The National Planning Policy Framework also states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the</p>

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				<p>preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>Additional policies are set out to be applied when defining</p>

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				<p>boundaries. Policies for the development of a village in a Green belt are also included.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should</p>

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				<p>regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the National Planning Policy Framework clearly state that when local planning authorities are ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the</p>



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				<p>housing market area, this is consistent with the policies set out in the National Planning Policy Framework, including policies on the protection of Green Belts.</p> <p>In addition, the presumption in favour of sustainable development makes a clear reference to Green Belts when it lists policies in the National Planning Policy Framework that indicate that development should be restricted.</p>
25	<b>Individual Topics -Gypsies and Travellers</b>	<p><b>The Garden Court Chambers Gypsy &amp; Traveller Team</b> considered that the revocation of Regional Strategies would have a detrimental effect upon the provision of sites for Gypsies and Travellers. They considered that the view in the Environmental Reports that sufficient sites would be delivered by local authorities without regional or national supervision was misconceived. They were therefore disappointed that consideration had not been given to the alternative option of</p>	<p><b>The Garden Court Chambers Gypsy &amp; Traveller Team, Community Law Partnership, Friends, Families and</b></p>	<p>It is the Government's view that Local authorities are best placed to understand the needs of their communities. The Government has produced new planning policy for traveller sites that reflects this. The policy published in March 2012<sup>9</sup> makes it clear that its overarching aim is to ensure</p>

<sup>9</sup> <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

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		<p>retaining those regional policies relating to the provision of sites for Gypsies and Travellers. <b>Community Law Partnership</b> supported these comments and added that revocation would lead to a decrease in the provision of new sites which would have an inevitable result in the numbers of Gypsies and Travellers on unauthorised encampments and unauthorised developments increasing. <b>Friends, Families and Travellers</b> also supported these comments and stated that they objected most strongly to the proposals to abolish Regional Strategies and, at the very least, considered that an option which retains a regional perspective should be retained for the provision of Gypsy and Traveller sites.</p> <p>The <b>National Federation of Gypsy Liaison Groups</b> also disagreed with the conclusions in the Environmental Reports that revocation was unlikely to have any significant environmental effect on human health, population, cultural heritage or the historic environment. The revocation of policies relating to the provision for Gypsies, Travellers and Travelling Showpeople, would have a significant impact as a direct result of the fact that without a regional framework, local authorities were likely to, and already were,</p>	<p><b>Travellers , National Federation of Gypsy Liaison Groups, Town and Country Planning Association</b></p>	<p>fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community.</p> <p>Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust evidence of need that will be tested at the Local Plan examination.</p> <p>This includes:</p> <p>(i) identifying and updating annually, a supply of specific</p>

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		<p>including reduced pitch numbers in their Development Plan Documents. The resulting lack of suitable accommodation was directly related to poor health and lower life expectancy, difficulty in accessing education opportunities, which contributed to poor living conditions, for example, on unauthorised sites. Unauthorised sites also impacted on the environment, for example if they were not suitably located there could be local impacts on the landscape.</p> <p>The <b>National Federation of Gypsy Liaison Groups</b> referred to a Single Issue Review of <b>Policy H7</b> - i.e. the provision of new pitches that each local authority should provide for Gypsies, Travellers and Travelling Showpeople in the South East. They referred to the unpublished draft Panel Report which recommended a total of 2,119 residential pitches be delivered to 2016; compared to just 1,064 pitches in the SE Regional Strategy draft <b>Policy H7</b>.</p> <p>The <b>Town and Country Planning Association</b> also considered that there would have been clarity and greater impetus to provide site accommodation for Gypsies and Travellers and Travelling Showpeople if the South East Regional Strategy review which was in its final stages in</p>		<p>deliverable sites sufficient to provide five years' worth of sites against their locally set targets;</p> <p>(ii) identifying a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;</p> <p>(iii) considering the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.</p> <p>The Duty to Co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.</p> <p>The proposal to abolish Regional Strategies is part of a</p>

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		May 2010 had been adopted.		wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority councillors on their leadership role in site provision.
26	<b>Individual Topics –Housing Supply</b>	The <b>Town and Country Planning Association</b> referred to the statement in the Environmental Report that under the regional strategies the overall direction was expected to be a widening gap between housing provision in the plan and the level of need. They commented that the	<b>Town and Country Planning Association, Campaign to Protect Rural</b>	The National Planning Policy Framework and the duty to co-operate address this issue. The National Planning Policy Framework makes clear that local planning authorities

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>actual level of house building in the region in the last year before the credit crunch (2007) was around 35,000 units, i.e. in excess of household projections. They considered that the assertion that local authorities planning for housing to reflect "the needs of their communities" would achieve this level was completely unsupported. The text asserts that "where drivers of growth are local, decisions should be made locally", but the new system failed to identify any mechanisms equivalent to the national growth areas or new growth points for accommodating in-migrants. This is a key issue in this region, the most economically buoyant in the country outside London.</p> <p>The suggested saving policies in the South East Regional Strategy to prevent the loss of a clear framework for strategic development in new settlements (<b>Policy SH2, LF6, AOSR3</b>), and major urban expansions (<b>Policies CO4 and MKAV2</b>), enabling housing provision levels in many districts in more environmentally constrained parts of the region to be set below trend levels.</p> <p><b>Campaign to Protect Rural England</b> believed that the Government's continued policy of not</p>	<p><b>England, Hives Planning Ltd</b></p>	<p>should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework. As part of this process, they should consider</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>allowing local authorities to include windfalls in their housing allowance (except in very prescribed circumstances) would, in practice, lead to an inevitable allocation of more greenfield sites.</p> <p><b>Hives Planning Ltd</b> on behalf of Arnold White Estates Ltd suggested that the assessment should have considered the socio-economic impacts of removing the regional planning framework on the provision of jobs and houses. They saw advantages of dealing with this regionally and the finding that “the pattern of development which the RSS seeks to encourage should make the region’s environment, and quality of life for its residents, much better than would be case without it” had not been addressed in the Reports. They also considered that the assessment should have looked at the impact of revocation on the delivery of housing, employment and infrastructure against wider identified needs through objective study, rather than needs identified by local authorities who may be more resistant to growth. They commented that Regional Assemblies were mainly composed of local authority representatives who were able to take a strategic planning overview above the</p>		<p>producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The National Planning Policy Framework states that Local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		tier and interests of the individual local authority.		such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.
27	<b>Individual Topics - Minerals and Waste</b>	The <b>Environment Agency</b> commented that the assessment of waste policies was quite comprehensive, but they were concerned with the second sentence in the last paragraph on page 61 of the Environmental Report which stated that,	<b>Environment Agency, Woodland Trust, Town and Country</b>	Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>“local waste authorities already work together, and with other bodies, on strategic issues that cross local authority boundaries and may work together to produce joint waste plans if they wish”. As waste plans are currently produced at county and unitary level, they questioned whether the Government was suggesting wider than county waste plans. If that was the case, they recommended that further details are provided on how this will be applied.</p> <p>The <b>Woodland Trust</b> commented that the draft National Planning Policy Framework had stated that waste would be considered in a National Waste Management Plan. No date has yet to be given for the publication of this plan. Therefore there will be a lack of environmental protection in the interim which has not been accounted for.</p> <p>The <b>Town and Country Planning Association</b> were concerned about the implications of losing regional targets/apportionment figures for landfill diversion (<b>Policy W5</b>), landfill capacity requirements (<b>Policy W13</b>) including for London exports (<b>Policy W3</b>), waste management capacity requirements (<b>Policy W7</b>), secondary and recycled aggregates (<b>Policy M2</b>), and</p>	<p><b>Planning Association</b></p>	<p>the area, whilst Section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more local planning authorities may agree to prepare one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework.</p>



No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		primary aggregates ( <b>Policy M3</b> ).		
28	<b>Individual Topics - Biodiversity</b>	<p>On the basis of the content of the consultation draft of the National Planning Policy Framework, <b>Natural England</b> disagreed with the statement in Section 1.2 of the Environmental Reports that the National Planning Policy Framework “maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl and preserve wildlife”.</p> <p>The <b>Woodland Trust</b> highlighted how in ‘Making Space for Nature’ Lawton set out that planning at different geographical scales was vital to inform conservation decisions. It also sets out that planning is pivotal in maximising the contributions of the existing network and ensuring that new components are sited in effective locations. The Trust believed that ‘Nature Improvement Areas’ recommended by Lawton would be very difficult to implement without the Regional Strategy in place.</p> <p><b>Scottish Natural Heritage</b> suggested that the Environmental Reports should address the</p>	<p><b>Natural England, Woodland Trust, Scottish Natural Heritage and the Environment Agency, Royal Society for the Protection of Birds, Wildlife and Countryside Link, Town and Country Planning Association.</b></p>	<p>The National Planning Policy Framework makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provide net gains in biodiversity where possible, and contribute to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures.</p> <p>The National Planning Policy Framework also states that local plans should contain a clear strategy for enhancing the natural, built and historic environment, and support Nature Improvement Areas where they have been identified.</p> <p>The National Planning Policy</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the Environmental Reports if they identified a framework for establishing networks of green infrastructure across all the regions of England, with the potential to link with Wales and Scotland, rather than just to propose partnerships across local authority boundaries.</p> <p><b>The Environment Agency</b> suggested that the significance of new emerging initiatives set out in the Natural Environment White Paper, such as Local Nature Partnerships (LNPs) and Nature Improvement Areas (NIAs) should be highlighted. The overall purpose of LNPs is to bring a diverse range of individuals, businesses and organisations together at a local level to create a vision and plan of action for how the natural environment can be taken into account in decision making. In the absence of regional policies, LNPs and NIAs could offer a good opportunity to strengthen local action, enable local leadership and operate across administrative boundaries.</p> <p><b>Royal Society for the Protection of Birds</b> and the <b>Wildlife and Countryside Link</b> provided</p>		<p>Framework also asks that, in order to minimise impacts on biodiversity and geodiversity, planning policies should: plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.</p> <p>The National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships to assess existing and potential components of ecological networks.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>examples of policies in the South East Regional Strategy that they considered should be saved. Policy NRM6 was considered to provide a statutory framework for the Thames Basin Heaths Delivery Plan which was part of the arrangements for delivering housing growth around the Thames Basin Heaths SPA. Policy NRM5 was considered to provide a sound framework for the conservation and enhancement of biodiversity in the region, clearly establishing the principle of no net loss of biodiversity and setting a strong directive to the achievement of a net gain in biodiversity across the region. The added that it sets out the hierarchical approach to the protection of biodiversity sites in the region, reflecting the European and UK legislation and PPS 9.</p> <p>The <b>Town and Country Planning Association</b> also referred to <b>Policy NRM6</b> and the use of the Regional Infrastructure Fund to assist with the provision of Strategic Alternative Natural Green Space. They considered that without this implementation mechanism, it was possible that some local authorities would not consider this a sufficient priority for scarce resources, and hence development in this economically buoyant part of</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>the region may be stalled. They considered that the same uncertainty about initiatives to link up green infrastructure networks may also arise, despite the Duty to Co-operate which is intended to play a key role in enabling local authorities to proactively and positively address the issues.</p> <p>The <b>Wildlife and Countryside Link</b> also stated that the South East Regional Strategy gave protection to land outside designated Natura 2000 and Ramsar sites which is used by species for which the protected sites were designated. They considered this would be lost if the Regional Strategy was revoked entirely.</p>		
29	<b>Individual Topics - Renewable Energy</b>	<p><b>RenewableUK</b> were concerned that the Strategic Environmental Assessment process failed to fully account for the impact that the removal of the Regional Strategies would have on the ability of local authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of generating 15% of all energy from renewables by 2020. Overall, they suggested that there will be significant environmental effects of revoking the regional plans, if guidance and support for renewable energy development was not strengthened. Under existing proposals, the key mechanisms</p>	<b>RenewableUK</b>	<p>The National Planning Policy Framework, published in March 2012, includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>for strategic planning and renewable energy would be lost.</p> <p><b>RenewableUK</b> considered the following policies contained in the South East Regional Strategy to be relevant for renewable energy deployment, the loss of which would result in a significant impact on the environment:</p> <ul style="list-style-type: none"> <li>• CC1 - Sustainable development</li> <li>• CC2 - Climate change - to mitigate and adapt to climate change</li> <li>• NRM11 - Development design for energy efficiency and renewable energy. Local authorities to promote and secure greater use of and decentralise renewable low-carbon energy etc.</li> <li>• NRM13 - Renewable energy targets - sets minimum regional targets for electricity generation from renewable sources.</li> <li>• NRM14 - Sub-regional targets for land-based renewable energy - policies and development proposals as far as practicable to contribute to sub-regional land based targets.</li> <li>• NRM15 - Location of renewable energy</li> </ul>		<p>Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>The National Planning Policy Framework contains a number of policies aimed at encouraging the development of renewable energy development including that local planning authorities should: have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>development - to encourage the development of renewable energy to achieve the set targets.</p> <ul style="list-style-type: none"> <li>• NRM16 - Renewable energy development criteria - Through their plans and decisions, local authorities should in principle support the development of renewable energy, and include criteria-based policies set out in the Regional Strategy.</li> </ul>		<p>satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.</p> <p>In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p>
30	<b>Individual Topics - Transport</b>	<b>Friends of the Earth</b> considered that the removal of the Regional Strategies would in some cases have a negative environmental effect as their	<b>Friends of the Earth, Jeremy Baker</b>	The National Planning Policy Framework includes a number of core planning principles.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>transport policies were stronger than those presented in the draft National Planning Policy Framework.</p> <p>A representation from an individual (<b>Jeremy Baker</b>) was particularly concerned about the proposed revocation of Policy T4 relating to parking at railway stations. He explained that the sustainability benefits of encouraging rail travel and of making proper provision for rail travellers were rarely seen within a single local planning authority area. He considered that the analysis of the effect of revoking the policy was inadequate. He accepted that it was true that local planning authorities have powers, but he considered that there needed to be active policy encouragement to use the powers. He considered that the policy should be dealt with in the National Planning Policy Framework.</p>		<p>These include the need to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The National Planning Policy Framework makes it clear that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. The National Planning Policy Framework also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.</p> <p>The National Planning Policy Framework is clear that plans and decisions should ensure</p>



No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also says that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
31	<b>Individual Topics - Water</b>	The <b>Town and Country Planning Association</b> commented that under the Regional Strategy policies, it was simply stated that waste water treatment capacity could come under stress. But there was no mention of the pioneering collaboration between the Regional Planning Body and the Environment Agency and water companies to identify the best locations for major new development to safeguard river water quality. The description of regulatory mechanisms to ensure water supply under the localism agenda ignored the advocacy undertaken in Regional Strategies to promote greater water efficiency in	<b>Town and Country Planning Association</b>	The National Planning Policy Framework is clear that local planning authorities should work with other bodies to assess the capacity of water supply infrastructure, and should set out in the Local Plan their strategic priorities and policies for the provision of such infrastructure.  More generally the National Planning Policy Framework tells local planning authorities to

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>new building in this part of the country, and the sustainability checklist produced by South East England Development Agency. They considered that the safeguards under the localism agenda on managing local flood risk were reactive in approach. There was no mention of the coordinated supply/demand modelling undertaken by the Environment Agency and water companies at a regional level to influence the location of major new development.</p>		<p>adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant EU obligations – which include, for example, obligations under the Water Framework Directive.</p>
32	Individual Topics -	<p><b>Campaign to Protect Rural England's</b> position was that revocation, combined with the</p>	<p><b>Campaign to Protect Rural</b></p>	<p>The National Planning Policy Framework was published in</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	<b>Brownfield land</b>	Government's wider reforms to the planning system, had seen the abandonment of policies aimed at making re-use of previously developed land a priority. They submitted that this was likely to lead to increased urban sprawl and environmental degradation. They also highlighted research by Campaign to Protect Rural England showing that very substantial amounts of brownfield land remained in the region and continues to be produced. They felt that the goal of urban regeneration would suffer significantly through the abandonment of this 'brownfield first' policy - with negative consequences for the environment.	<b>England</b>	March 2012. One of the 12 planning principles set out in the National Planning Policy Framework is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The National Planning Policy Framework makes it clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111).
33	<b>Individual Topics - Flooding</b>	The <b>Environment Agency</b> welcomed the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' (LLFA) duties on flood risk management and the complementary duty in the Floods and Water Management Act on bodies to cooperate. The provision of technical guidance, including on flood and coastal erosion risk, to	<b>Environment Agency</b>	The National Planning Policy Framework contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that Local planning authorities

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>complement the National Planning Policy Framework would support LLFAs and help achieve the Duty to Co-operate.</p>		<p>should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: the provision of infrastructure for flood risk and coastal change management.</p>
34	<p><b>Individual Topics -National Parks and AONBs</b></p>	<p><b>Friends of the Earth</b> referred to Policy C1 in the South East Regional Strategy which relates to the New Forest National Park. They stated that it goes beyond national planning policy in requiring local authorities and other partners to "develop supportive sustainable land management policies", both inside the National Park and within the zone of "New Forest commoning activity" including "protection of grazing land outside the National Park which is needed to support National Park purposes." It also stated: "Planning decisions should also have regard to the setting of the Park". They saw that as an example of a regional policy, and as the Park shares different local authority boundaries, differences of approach which would be detrimental to the integrity of the Park were sure to arise. Likewise, Policy C3 which deals with AONBs says: "In drafting local development documents, local</p>	<p><b>Friends of the Earth, South Downs Network</b></p>	<p>The New Forest National Park Authority adopted its Core Strategy and Development Management Policies in December 2010. As part of the delivery of the long term planning vision for the National Park it recognises the relationship with surrounding areas. This is stated to have been a key consideration in drawing up the Core Strategy.</p> <p>More generally, the National Planning Policy Framework maintains the strong protection afforded to National Parks (paragraph 115).</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>planning authorities should have regard to statutory AONB Management Plans". They were concerned that this issue was not specifically mentioned in the draft National Planning Policy Framework. The <b>South Downs Network</b> expressed concerns cross boundary working under the new proposals is likely to be less well co-ordinated than under the strategic framework of the South East Plan.</p>		

# Annex B

## Consultation and Partner Engagement – Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the South East Regional Strategy ran from 11<sup>th</sup> October 2012 until 6<sup>th</sup> December 2012.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the Regional Strategy for the South East have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the South East have been identified, described and assessed; and,
- the arrangements for monitoring.

In total 35 written responses were received summarised by interest group:

- 6 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- 15 Local planning authorities (Arun District Council, Aylesbury District Council, Basingstoke and Deane Borough Council, Cherwell District Council, Dorset County Council, Horsham District Council, Kent County Council, Mid Sussex District Council, Milton Keynes Council, New Forest National Park, Oxfordshire County Council, the Royal Borough of Windsor & Maidenhead, South Oxfordshire District Council, Surrey Heath Borough Council and the Thames Basin Heaths Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council);
- 1 Parish Councils (Aspley Guise Parish Council);

- 5 NGOs and local pressure groups (Campaign for the Protection of Rural England (Hampshire Branch), Royal Society for the Protection of Birds, South Downs Society, Town and Country Planning Association, Woburn Sands and District Society);
- 1 Industry representatives (RenewableUK);
- 5 Developers and planning consultants (Barton Willmore, GVA, Gleeson, Januarys and Savills and DAC Beachcroft);
- 2 Individuals (J.D.I.Baker and Graham N. Phillips).

The following table summarised the points made and the Government's response.

**Table B1 Responses to the consultation on the updated Environmental Report (published in 11<sup>th</sup> October 2012)**

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
1.	<p><b>The overall approach taken to Strategic Environmental Assessment</b></p>	<p><b>Natural England</b> welcomed the updated Environmental Report and believe that it is a significant improvement over the previous iteration.</p> <p><b>Environment Agency</b> agreed with the overall approach and welcomed the updated environmental report as much more detailed and clearer document than the original one.</p> <p><b>Environment Agency</b> is also pleased to note that most of their previous comments on earlier versions of the report have been reflected in Appendix F.</p> <p><b>English Heritage</b> stated the updated Environmental Report provides a much more rigorous assessment than its predecessor of the potential implications which revocation of the regional strategy will have on the region's historic environment. <b>English Heritage</b> agree with the updated Environmental Report's conclusions about the likely effects which the revocation of the regional strategy will have and broadly endorse the means by which the absence of the regional strategy will be addressed by implementation of the duty to co-operate and National Planning Policy Framework.</p>	<p>Comments noted.</p> <p>The Government welcomes the fact that the three English Strategic Environmental Assessment consultation bodies, English Heritage, Natural England and the Environment Agency consider the updated Environmental Report on the proposed revocation of the South East Regional Strategy improves on the initial Environmental Report published in October 2011.</p>



No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Scottish Natural Heritage</b>, the <b>Scottish Environment Protection Agency</b> and <b>Historic Scotland</b> did not anticipate any significant environmental effects from the revocation of the plan on the Scottish environment and had no further comments to make on the updated environmental report.</p> <p><b>Aylesbury Vale District Council</b> state that the updated Environmental Report is a meticulously prepared assessment of the impacts of revoking the South East Plan and agree with the conclusion reached that there would be significant positive effects from the revocation of the South East Plan.</p> <p><b>Mid Sussex District Council</b> supports the environmental assessment work which has been undertaken and the progress that is being made towards revoking the South East Regional Strategy.</p> <p><b>Town and County Planning Association</b> welcomes the fact that the Strategic Environmental Assessment process in the updated Environmental Report has used a more robust methodology.</p> <p><b>Woburn Sands and District Society</b> stated in their</p>	<p>The Government welcomes the comments from the three Scottish Strategic Environmental Assessment consultation bodies, Scottish Natural Heritage, the Scottish Environmental Protection Agency and Historic Scotland who do not anticipate any significant environmental effects from the revocation of the South East Regional Strategy on the Scottish environment.</p> <p>The Government acknowledges that the updated Environmental Report has been welcomed and thought robust by a wide range of interested parties, including local planning authorities such as Aylesbury Vale District Council, Mid Sussex District Council, the Town and Country Planning Association, which is a nationally recognised Non Government Organisation, and a local interest group, the Woburn Sands and District Society which represents residents.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>view there was no requirement for a second Strategic Environmental Assessment, that the Government under pressure from developers and the Treasury are trying to keep regional strategies in place as long as possible. They considered that that the updated Strategic Environmental Assessment although unnecessary has been undertaken in a robust and indepth fashion. Woburn Sands and District Society go on to state that they deplore the unnecessary delay in revoking the outdated and undeliverable regional strategies thereby undermining the whole basis of Localism.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) concurs that the updated Environmental report is compliant with the requirements of the EU Directive (2001/42/EC(D)) and the Environmental Assessment of Plans &amp; Programms Regulations 2004.</p>	<p>Comment noted.</p>
2.	<p><b>The overall approach taken to Strategic Environmental Assessment – reasonable</b></p>	<p><b>English Heritage</b> note that arguments could be made for any of the options of full or partial revocation of the the South East Regional Strategy. They conclude ‘simplicity has many advantages and the complexity of saved policies in county structure plans and local plans has added</p>	<p>Comments noted.</p> <p>The Government notes English Heritage’s statement on simplicity and the difficulties in recent years for the public to understand strategic planning. However, where necessary for mitigation of effects, or in response to</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>alternatives</b></p>	<p>difficulties to public understanding of strategic planning in recent years’.</p> <p><b>Basingstoke and Deane Borough Council</b> generally accept the findings that there are no policies which would cause a significant negative environmental effect if removed nor provide a significant environmental benefit if the policy were retained.</p> <p><b>Dorset County Council</b> feels the overall assesment has insufficiently accounted for two key points.They consider that the assessment does not take account of the differing policy contexts before and after the planned revocation. Secondly, the Council suggests that the assessment does not</p>	<p>representations, consideration has been given to saving certain policies or saved structure plans for a transitional period. The Government has taken account of the findings of the Strategic Environmental Assessment process, including the findings of the initial and updated environmental reports and consultation and the conclusions on choosing the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) is set out in Chapter 5 of this Post Adoption Statement.</p> <p>Comments noted.</p> <p>The benefits from more localised policies are noted in key points summarised in the Non-Technical Summary. Page xiii of the Non Technical Summary in the section headed ‘What are the likely significant effects of the plan to revoke the South East Regional Strategy and the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>appear to test fully the uncertainty of impact arising from the removal of a strategic tier of plan (with the Regional Strategy having replaced the former structure plans).</p>	<p>reasonable alternatives?'. The section states that 'a locally-led approach could ensure that the adverse effects are more effectively mitigated. This could be through a more detailed understanding of local environmental capacity issues and possibly more diverse and locally-specific spatial distributions of development.</p> <p>The effects of uncertainty of impact arising from the removal of a strategic tier of decision making are outlined on page xiii - xiv of the Non technical Summary, for example:</p> <p>'Many of the benefits of retention relate to spatial planning issues that cross local authority boundaries (e.g. green infrastructure) and require direction and co-operation from a number of stakeholders including local authorities to be realised. Therefore, in the case of revocation, it is AMEC's view that there may be more uncertainty about benefits coming forward in the short to medium term where local authorities need to establish arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in their adopted Local Plans.'</p> <p>These points are expanded on pages 174 – 175 of the Section 4.4 'Secondary, Cumulative and</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Mr J.D.I. Baker</b> welcomes the fact that reasonable alternatives have now been considered, notably Partial Revocation, involving the retention of certain South East Plan Policies. He suggests that this is most suitable where environmental issues are dealt with in the South East Plan and nowhere else in planning policy or such limited guidance as now remains, with specific reference to Policy T4 (related to parking at railways stations).</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) state that they do not question the assessment or rationale behind the selection of the reasonable alternatives. The consortium provides commentary on the reasonable alternatives and the conclusions</p>	<p>Synergistic Effects' as well as section 4.5. The effects of revocation of individual strategic policies are outlined in section 4.2 of the updated Environmental Report and</p> <p>Comments noted.</p> <p>Section 2.4 of the updated Environmental Report outlines the plan to revoke the regional strategies and reasonable alternatives to it, highlighting that many of the alternatives considered reflected consultation responses to the initial Environmental Report on the proposed revocation of the South East Regional Strategy, published for consultation in October 2011. The Government response regarding Policy T4 is set out at row 14, below.</p> <p>Comments noted.</p> <p>Section 2.4.1 and 2.4.2 of the updated environmental report summarises the range of alternatives considered for revocation, partial revocation and retention of the South East Regional Strategy. A summary is provided for</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>drawn from the assessment of those alternatives. The Consortium strongly prefers the retention, for a transitional period, of all the spatially specific and quantified policies.</p> <p><b>Surrey Heath Borough Council</b> and the <b>Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council)</b> notes the Strategic Environmental Assessment considers a number of alternatives to full revocation of the South East Regional Strategy. They consider that the alternative of maintaining the plans and revising certain policies has not been taken forward in terms of whether it is considered reasonable or not or any justification for rejection. They consider that there is no reasoned justification for not appraising the revision of certain policies (i.e. retention of parts of policies).</p>	<p>each alternative considered along with the conclusion of whether the alternative is reasonable and the justification for the conclusion.</p> <p>In section 2.4.1 of the updated environmental report, retention, maintenance and updating of the South East Regional Strategy is one of the alternative considered. Section 2.4.2 sets out partial revocation alternatives including revocation of different policies (whether regional, subregional or quantitative) which would then necessitate retention of some policies. Furthermore, consideration of partial revocation alternatives included the revocation of all policies, ambitions and priorities except those where revocation would lead to significant negative environmental effects. Retention of part or parts of an individual policy were not considered as an alternative, given the requirements of Article 5(1) of the SEA Directive to consider alternatives that took into account the objectives and geographic scope of the proposed plan [here the plan to revoke]. It is also noted that there are difficulties in determining which component(s) would be retained, which would be revoked, whether</p>

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		<p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) state that the Strategic Environmental Assessment throughout is termed in respect of the 'plan' to revoke the regional strategies. They consider it is more appropriate to term this 'a proposal' to revoke.</p>	<p>components would be retained or updated, or whether all 179 policies would need to be considered in such a manner to ensure consideration was equitable across all policies.</p> <p>The Government's response to requests to retain policies is set out in this table and the reasons for choosing the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) are set out in Chapter 5 of this Post Adoption Statement.</p> <p>Comments noted.</p> <p>The Directive on the assessment of the effects of certain plans and programmes on the environment and the associated UK regulations requires that an SEA should seek to identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme. The term 'plan' in respect of 'plan to revoke' is used to be consistent with the terminology used in the regulation and European Directive.</p>

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3.	<p><b>Additional information that should be contained with the baseline or review of plans and programmes</b></p>	<p><b>English Heritage</b> does not propose to comment on the baseline evidence but believe that asset based information and wider area analysis continue to be necessary, the latter often calling for joint working between authorities and English Heritage.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) state that the baseline review appears comprehensive although in respect of population the notable absence of data is that of housing need and demographic change. They criticise the lack of evidence on household growth and population. They consider more up to date evidence should have been used such as the more recent evidence collected at local level, a review of all the present locally produced housing needs. A range of data were supplied by Savills in their representation, specifically data on development plan production and locally planned housing.</p> <p><b>Horsham District Council</b> note that they now hold evidence which is more recent than that contained within the updated environmental report. This</p>	<p>Comments noted.</p> <p>The Government notes that English Heritage does not propose to comment on the baseline evidence.</p> <p>Appendix E of the updated Environmental Report presents the detailed information that makes up the baseline for the 12 SEA topics considered in the assessment of the plan to revoke the South East Regional Strategy. Proportionate to the plan to revoke, the information presented is national and regional in nature. Section 2.3.3 of Appendix E describes the baseline for both the South East demographics and housing. Section 2.5.2 of Appendix E describes the evolution of this baseline with particularly reference to housing need (albeit in qualitative terms), for example, 'In the short term, the increase in housing provision under the South East Plan will be insufficient to accommodate the forecast number of emerging households and combat the housing backlog'. The additional housing data identified by Savills is helpful in providing a more complete picture;</p>



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		<p>includes a locally generated Needs Study into housing numbers, which is based on up-to-date demographic and economic data including the 2011 Census, which recommend housing numbers which could be slightly below, but are broadly in accordance with those outlined in the South East Plan. The Council anticipates publication of its Preferred Strategy in early 2013.</p> <p><b>Milton Keynes Council</b> states the updated Environmental Report does not refer to emerging plans and the Milton Keynes Core Strategy is a key example. They suggest that this should be included in the review of plans in Appendix C.</p>	<p>however, does not materially affect the assessment or its broad conclusions, as acknowledged by the respondent, 'this overall broad conclusion for the purposes of the SEA as an assessment and method in itself is not disputed'.</p> <p>For the purposes of the assessment, revocation was considered to have occurred concurrent with when the assessment was undertaken. To assess the resulting effects required consideration of the adopted Local Plans (and specific policies contained therein). Appendix C to the updated Environmental Report summarises this information. The focus on adopted plans reflected the view that until adopted, emerging plans have more limited effects on planning decisions, will be subject to change and have uncertain implementation timeframes. However, where relevant, emerging Local Plans have been referenced in the assessment of the specific Regional Strategy policies contained in Appendix D of the updated Environmental Report. For example, for Regional Strategy Policy MKAV1: Housing Distribution by District 2006-2026, the following comment is referenced under revocation: 'The</p>

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		<p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) do not dispute the information in the updated Environmental Report, but provide more up to date evidence that shows 52% of Local Authorities without an up to date plan. They state that it is not the case that on revocation there would be total up to date plan coverage. They provide evidence, including showing that 11 local planning authorities are presently at Examination in Public and assuming adoption of all these local plans would result in 24 local planning authorities without up to date local plans (35%), and only 21% of local planning authorities with post March 2012 local</p>	<p>Core Strategy for Milton Keynes, which is undergoing public examination (July 2012), no longer supports the housing provision included within the South East Plan (see MKAV2). The draft strategy sets a short term (0-5 year) target of 1,750 dwellings per year which can be met from the existing commitment. This level of provision is lower than the 2,218 per year within MKAV 2). The draft strategy is committed to an early review which may lead to higher targets in the longer term.'</p> <p>Disagree.</p> <p>The updated Environmental Report does not assume that 'on revocation there would be total up to date plan coverage'. Section 2.3.7 of the updated Environmental Report presents information on the status of Local Plans within the region. The report noted that, at the time of publication, whilst nearly a third of the 68 local planning authorities in the South East have adopted development plan documents under the Planning and Compulsory Purchase Act 2004, the remaining 47 local planning authorities have Local Plans and saved structure plan policies,</p>

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		<p>plans. Savills therefore suggest that the weight applied to the factor that 'all' local planning authorities have development plans in place therefore strongly affects the overall SEA conclusions in respect of the effect of revocation on Population and Human Health in particular. Savills argue that it is not the case that on revocation there would be total up to date plan coverage, it will be partial at best.</p>	<p>developed under the earlier requirements of the Town and Country Planning Act 1990. Section 3.4.3 states: 'Revocation of the Regional Strategy and the reliance on the National Planning Policy Framework creates a situation where there will be a delay, as some authorities will need to review and update their Local Plan to reflect National Planning Policy Framework policies and the needs of their local communities. In these instances where there is a lack of an up to date Local Plan, the uncertainty over policy, including the quantum and preferred location of development, is likely to affect whether developers submit planning applications for new development. As a result, it is AMEC's view that there will be a lessening in the short and medium term of development activity and the resulting effects occurring'. This issue may be relevant for up to 47 out of the 68 South East local planning authorities who adopted Local Plans before 2009 (the date of the adoption of the South East Plan). The issue of uncertainty is documented throughout the report (page xiii of the Non-Technical Summary, page 93 of section 4.2, page 175 of section 4.5, page 178 of Chapter 5).</p>

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		<p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) states that they are concerned that the assessment in Appendix C [of the updated Environmental Report, setting out Existing adopted Local Plans and saved policies] has not been adequately portrayed in the main findings of the Assessment. For example, there does not appear to be any regional-wide 'heading figure' reported in respect of key locally planned growth against the South East Plan.</p> <p><b>Surrey Heath Borough Council</b> and the <b>Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council)</b> state the environmental impacts of delivering more housing than is set out in the South East Plan cannot be ascertained when the figure is unknown. The Strategic Environmental Assessment for the South East Plan identified numerous negative effects related to growth which were reduced through policy interventions. There is no guarantee that local plans under preparation will include the same environmental safeguards as the South East Plan and as such cannot be relied upon for the purposes of assessing effects in the revocation Strategic Environmental Assessment.</p>	<p>Comment noted.</p> <p>Housing figures for the region are not totalled; however, with 47 of the 68 local plans not containing housing policies in conformity with the Regional Strategy policy H1, there is a difference, which is acknowledged throughout the report. For example, in terms of housing, the effects of revocation for those local planning authorities will be 'uncertain in the short and medium term in those local authorities that do not have a plan that was in general conformity with the South East Plan.....In consequence, the amount of development anticipated in this period may be lower than if the Regional Strategy were in place. This will mean that the negative effects associated with development (on biodiversity, water, air, material assets etc) will be lessened as would the beneficial effects (on population). The application of the National Planning Policy Frameworks presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.' (page 92-93 of the updated Environmental Report). Any total will be subject to change over time, dependent on the</p>

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			<p>content of adopted new local plan policies, reflective of local housing need in these remaining 47 local planning authorities. In AMECs view it was not the total per se that was important, rather that there was a difference manifest in nearly half of all local plans in the region.</p> <p>The Local Plan analysis contained in Appendix C is referenced throughout the updated Environmental Report and Appendix D and E.</p> <p>The Government notes the comment made regarding the guarantee of the same environmental safeguards and protection. The revocation of Regional Strategies does not affect national policy requirements set out in the National Planning Policy Framework on environmental safeguard, including those to protect the Thames Basin Heath Special Protection Area, or the legal requirements set out in the Conservation of Habitats and Species Regulations 2010.</p>

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4.	<b>Whether the likely significant effects have been identified, described and assessed</b>	<p><b>Arun District Council</b> considers that there are very few cases where revocation of policies will have a negative environmental effect overall, due to mitigation through the National Planning Policy Framework and individual Local Plans. They consider that revoking the South East Plan may lead to positive effects on the appraisal objectives concerned with biodiversity, climate change, landscape and human health as local plan policies will be more stringent.</p> <p><b>Horsham District Council</b> is in broad agreement with the findings of the Strategic Environmental Assessment of the revocation of the South East Plan, but given the work that the District Council has undertaken since 2009, some of the uncertainties raised in the report are not considered to exist, and potential negative impacts identified in the Strategic Environmental Assessment are therefore more limited than is indicated.</p>	Comments noted.
5.	<b>Whether the likely significant effects have been identified, described and</b>	<b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) agree with the Assessment in respect of reporting an increased time lag in positive effects for Population arising from revocation in comparison to retention,	The Savills and DAC Beachcroft submission has reviewed the short, medium and long term assessments of the South East Plan policy H1 and suggests that both retention and revocation of the policy be scored less positively for the SEA

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	<p><b>assessed: population and human health</b></p>	<p>however considers that there are potentially negative effects in the short to medium term for Population and Human Health arising from revocation which have not been appropriately concluded in the Assessment. This is because of the number of Local Authorities without up to date plans and the real risk of fewer homes being planned (and hence reduced favourable planning decisions for new homes).</p> <p>They propose amendment of the assessment to take account of their assessment to ensure that the potential negative effects on Population (in respect to housing delivery) and therefore also Human Health (in respect of meeting housing needs) are demonstrated in respect of revocation.</p>	<p>topic of Population and Human Health due to the effects of delays and uncertainty. The negative effect score given by Savills for revocation in the short term is justified by 'a significant number of out of date plans and a reduction in planned housing. The focus of Local Authority resources may be directed towards plan reviews ahead of decision taking.'</p> <p>The effects of uncertainty and delay during the short and medium term are recorded throughout the updated Environmental Report (for example page xiii of the NTS, paragraph 1 of page 93, paragraph 5 of page 173). In making the assessments of the plan and reasonable alternatives across all policies, AMEC has used topic specific definitions (section 3.4.2 and Appednix E). For each topic, criteria are provided on what constitutes a significant effect, a minor effect or a neutral effect for each of the 10 environmental issues. The Population and Human Health definitions are contained in Appendix E (Table 2.2 and 3.1). For Population, for example, a negative effect would arise where an:</p> <ul style="list-style-type: none"> <li>• Alternative will lead to a decrease in housing</li> </ul>

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			<p>supply below the current completion rate in the region, affecting the choice of homes for communities.</p> <ul style="list-style-type: none"> <li>• Alternative will reduce opportunities to create sustainable, inclusive and mixed communities.</li> <li>• Alternative will lead to a minor increase in unemployment.</li> <li>• Alternative will reduce the resilience and diversity of the regional and local economy.</li> <li>• Alternative will reduce the long term investment in key regional sectors and specific localities.</li> </ul> <p>The resulting assessment (of all policies, not just H1) is consistent with these definitions. It appears from the justification given (although is not explicit in the submission) that the basis of the Savills proposed amendments is the effect relative to the planned housing figures in the Regional Strategy rather than completion rates and as such, whilst perhaps understandable, it is inconsistent with the basis for judgements of significance used in the current assessment.</p>



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			<p>Given the apparently different basis of judgements, both the updated Environmental Report's assessment of policy H1 and Saville's assessment of policy H1 could be considered reasonable conclusions without being in contradiction; however, to amend the basis of the assessment contained in the updated Environmental Report to be in line with that proposed by Savills would affect the entire assessment (not merely H1) and is not deemed necessary, given that the differentiation between retention and revocation is clear and comments on the effects of uncertainty and delay in the short and medium term are made throughout the report.</p>
6.	<p><b>Whether the likely significant effects have been identified, described and assessed: human health, air quality and climatic factors</b></p>	<p><b>Surrey Heath Borough Council</b> state that policies in the Regional Strategy regarding transport and air quality are clearer in their intention and direction to seek environmental enhancements than the National Planning Policy Framework and therefore revocation of these policies cannot elicit significant positive effects on human health, air quality and climatic factors. They consider that at best revocation may give rise to minor positive effects however the majority are likely to be</p>	<p>Comment noted.</p> <p>Table 4.5 of the updated Environmental Report records the cumulative effects of revocation of the South East Regional Strategy and concludes that effects will be largely neutral or a minor negative. Policies concerning airport development are scored as significantly negative against air quality and climate change.</p> <p>The Government recognises that policies in the</p>

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		<p>uncertain/unknown.</p> <p><b>Surrey Heath Borough Council</b> and the <b>Joint Strategic Partnership Board (hosted by Surrey Heath Borough Council)</b> state that while the duty to co-operate may allow several local authorities to work together constructively and identify policies for limiting or mitigating development where environmental harm can be demonstrated on strategic issues, this will only ever be carried out in clusters of local authorities considering issues with</p>	<p>National Planning Policy Framework, including those on transport and air quality, differ from more detailed policies in the Regional Strategy. However the National Planning Policy Framework makes clear that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion and local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. It is also clear that planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.</p> <p>Comment noted.</p> <p>Revocation of the South East Regional Strategy does not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans. The duty to co-operate requires local authorities and other public bodies (such as Natural England and the Environment Agency) to work together constructively, actively and on an ongoing basis</p>

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		<p>a local perspective. As such revocation cannot allow a consideration of wider strategic issues to reduce/mitigate environmental effects and neither can it be relied on that other parties (i.e. utilities) will either. Therefore it is considered that the Strategic Environmental Assessment cannot come to the conclusion that revocation of Policy H1(Regional Housing Provision 2006-2026) will have similar effects as retention.</p>	<p>in relation to planning for strategic, cross-boundary matters in local and marine plans. Utilities, particularly water companies also do this (for example Portsmouth Water and Havant Borough Council regarding the inclusion of Havant Thicket Reservoir as a strategic site under policy CS19 of the Havant Core Strategy, adopted 2012). Examples of cross-authority working in the South East region are outlined in section 2.2.5 of the updated Environmental Report. Examples of other local authority partnerships are listed in:</p> <p><a href="http://www.sefs.org.uk/wp-content/uploads/SE_England_Bodies1.pdf">http://www.sefs.org.uk/wp-content/uploads/SE_England_Bodies1.pdf</a></p> <p>The updated Environmental Report records differences in the short and medium term for the assessment of revocation and retention of H1. The effects of revocation for those local planning authorities will be 'uncertain in the short and medium term in those local authorities that do not have a plan that was in general conformity with the South East Plan.....In consequence, the amount of development anticipated in this period may be lower than if the Regional Strategy were in place. This will mean that the negative effects</p>

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			<p>associated with development (on biodiversity, water, air, material assets etc) will be lessened as would the beneficial effects (on population).’ (page 92-93 of the updated Environmental Report).</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources. These include existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) as well as policy contained in the National Planning Policy Framework.</p>

7.	<p><b>Whether the likely significant effects have been identified, described and assessed: weight applied to the National Planning Policy Framework</b></p>	<p>Regarding the weight applied to the National Planning Policy Framework and the updated Environmental Report consideration regarding the broad effect on the supply of housing being ‘boosted’ by the revocation of the South East Plan, <b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) suggest that the evidence included in their representation demonstrates the contrary to the updated Environmental Report.</p>	<p>Comment noted.</p> <p>It is Government policy to boost significantly the supply of new housing, for example through initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates, which are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth. The Growth and Infrastructure Bill similarly seeks to address issues affecting current housing supply.</p>
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No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Januarys</b> disagree with the comments in the updated Environmental Report that the National Planning Policy Framework would boost the supply of housing if the regional framework was revoked as although it seeks to increase the supply of housing, it is the development plan – which includes the regional strategy – that defines housing targets.</p>	<p>Revocation, the National Planning Policy Framework policies and the presumption in favour of sustainable development are only part of this commitment to growth and housing provision.</p> <p>The National Planning Policy Framework and the duty to co-operate require that local planning authorities use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (including, for example, those on environmental designations). They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.</p>
8.	<p><b>Reliance on the National Planning Policy Framework and the Duty to Cooperate</b></p>	<p><b>Environment Agency</b> as a ‘named party’ supports the duty to co-operate and will support local planning authorities to consider cross-boundary issues such as adapting to climate change, reducing the impacts of flood risk, waste management and water resource management.</p> <p><b>Natural England</b> cite the experience of strategic</p>	<p>The Government notes the comments made by the Environment Agency and Natural England.</p> <p>The Government recognises the importance of strategic planning and the National Planning Policy Framework, makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in</p>

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		<p>partnerships working with Thames Basin Heaths Partnership for Green Infrastructure. However they state that significant amounts of time, effort and co-operation are required to create and maintain such partnerships and the emphasis on the duty as sufficient mitigation for negative impacts on the natural environment that are forecast may not be appropriate.</p> <p><b>Dorset County Council</b> states that the duty to co-operate provides an incentive for authorities to work together, but does not guarantee the delivery of a shared vision or strategy. They consider that the assessment should be far stronger in acknowledging the potential risks of losing a strategic tier of the development plan. Dorset County Council believe that without the regional strategy it will be harder for local planning authorities to assess the strategic impacts against the presumption in favour of sustainable development as set out in the National Planning Policy Framework. This poses an environmental risk which the Strategic Environmental Assessment ought to recognise. The Council states that much reliance in the updated Environmental Report is placed on the National Planning Policy Framework</p>	<p>individual local plans.</p> <p>This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as, planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>The statutory duty to co-operate underpinned by the National Planning Policy Framework enables</p>

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		<p>and the duty to co-operate in delivering effective strategic planning, including that which crosses the South East and South West regions and that revoking regional strategies poses environmental risks until local planning authorities have established effective mechanisms for dealing with strategic matters and this should be more explicitly recognised in the Strategic Environmental Assessment to place the importance upon effective partnership working across former regional boundaries. The Council suggest that without the South East Regional Strategy they ‘will have little impact’ when commenting on future strategies such as the Partnership for Urban South Hampshire or Solent Local Enterprise Partnership.</p> <p><b>Horsham District Council</b> note that within Sussex, joint work is continuing, including examples such as the Gatwick Diamond Sub-Regional Water Cycle Study, and more informally, including meeting with other Districts and West Sussex County Council to discuss the Green Infrastructure network across the County, and ensure that key Strategic Green Infrastructure resources are planned for and protected.</p> <p><b>Town and County Planning Association</b> believes</p>	<p>local planning authorities and other bodies to strategically plan for the types of environmental infrastructure cited by Natural England.</p> <p>Existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010 – which includes a duty to co-operate) is part of the hierarchy of measures that will apply in the short to long term in the absence of the South East Regional Strategy.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans. Nature Improvement Areas and Local Nature Partnerships already provide opportunities for cross- boundary working with partners’ working together to improve biodiversity through projects which can be expected also to contribute significantly to landscape</p>

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		<p>it is risky to rely on the assumption that local authorities will continue to work together on cross boundary strategic issues, and to assume that the inclusion of a brief policy reference in the National Planning Policy Framework and the duty to co-operate are effective substitutes for regionally and sub- regionally specific policy on key environmental topics.</p> <p><b>Campaign for the Protection of Rural England Hampshire</b> state the revocation of the South East Regional Strategy relies on untested processes for co-operation between local authorities, relies on an optimistic view of the delivery of housing growth and infrastructure, as well as environmental protection in local plans. They are unconvinced that the duty to co-operate, especially applied in the context of the National Planning Policy Framework, will result in better co-operation between councils and may be used by councils to undermine adjoining local plans.</p> <p><b>Campaign for the Protection of Rural England Hampshire</b> have concerns that the duty will result in weight being given to the views of unaccountable bodies, such as Local Enterprise Partnerships. All interests, including environmental interests, should</p>	<p>conservation. There are four Nature Improvement Areas located in the South East: the South Downs Way, The Greater Thames Marshes, Wild Purbeck and the Marlborough Downs.</p> <p>The Government welcomes the examples provided by Horsham District Council.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local</p>



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		<p>be heard in respect of strategic planning issues.</p> <p><b>RenewableUK</b> states that the Government should provide guidance to local planning authorities on the duty to co-operate and commission research to assess how effectively the Duty to Cooperate is helping the delivery of national outcomes such as renewable energy infrastructure. The <b>Environment Agency</b> also stated that the planning guidance review being carried out by Lord Taylor provides an opportunity to consider the role for new guidance to support the duty to co-operate</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) suggest a number of factors likely to moderate the positive benefits of the duty to co-operate in terms of its impact on housing delivery over the short and medium terms for example: that there is no prescribed way to meet the duty; that without further guidance or consistency in implementation the effectiveness of the duty is likely to vary significantly within the region; that it will take time for local planning authorities to agree administrative structures to implement the duty; that any significant positive effects of engagement on strategic matters are not likely to occur until local</p>	<p>plan may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the Duty to Cooperate.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the Duty to Cooperate should be one of the areas where the Government should consider providing new guidance as a priority. The conclusions of the Review Group have been generally welcomed by Government and was published on 21 December for an 8 week consultation. The Government will consider the consultation responses before responding to the Group's recommendations</p> <p>In recognition of the breadth of bodies involved in</p>

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		<p>planning authorities are in a position to understand their own local priorities and needs through robust evidence; and that the sanction for non-compliance with the duty only occurs following the local plan examination stage</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) do not consider that the finding in table NTS3 of the updated Environmental Report that revocation of the South East Plan is ‘unlikely to effect’ the provision of employment and housing land, due to the National Planning Policy Framework and examples such as Local Enterprise Partnerships, is correct. They request changes to the assessment as they suggest these statements do not fit easily with the assessment as a whole and conclusions made.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) considers that in the short term in particular as local planning authorities adjust to the requirements of the Duty to Cooperate there are likely to be more pronounced effects for Population and Human Health, notable planned housing. They suggest that these could be reduced where the South East Plan</p>	<p>effective strategic planning, the duty to cooperate applies to local planning authorities, county councils and public bodies that are prescribed in Local Planning Regulations 2012. These bodies are:</p> <ul style="list-style-type: none"> <li>• the Environment Agency;</li> <li>• the Historic Buildings and Monuments Commission for England (English Heritage);</li> <li>• Natural England;</li> <li>• the Mayor of London;</li> <li>• the Civil Aviation Authority;</li> <li>• the Homes and Communities Agency;</li> <li>• Primary Care Trusts;</li> <li>• the Marine Management Organisation</li> <li>• the Office of Rail Regulation</li> <li>• the Highways Agency;</li> <li>• Transport for London;</li> <li>• Integrated Transport Authorities; and</li> <li>• Highway authorities</li> </ul> <p>The Localism Act also provides an enabling</p>

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		<p>is retained or partially retained and allowed to run its course and remain as a basis from which to judge up to date plans at Examination in Public.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) suggest that the presumption in favour is more likely to be engaged (in short to medium term) via planning appeal and therefore the assumption therefore that revocation will boost local plan making is unlikely to be the case. The strain placed on local planning authorities' and developers' resources must also be considered with the risk of increased appeals over the short to medium term, diverting those resources away from local plan making functions and housing delivery.</p> <p><b>Environment Agency and Natural England</b> note that the updated Environmental Report recognises the significant development pressures in the South East associated with housing, employment provision and airport development, that without appropriate planning, these may lead to negative environmental effects in relation to water resources, material assets, climate change and air quality.</p> <p><b>Environment Agency</b> state that the National Planning Policy Framework and existing policy</p>	<p>power requiring the bodies that are subject to the duty to have regard to the activities of other bodies when they are preparing their local plans and related activities. Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>The Government has provided a response on the specific point of renewable energy at row 14 below and has responded to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement. This includes the finding that whilst the duty to co-operate could well address a wide range of strategic issues, such as the delivery of green infrastructure, there is uncertainty as to how this might work and, although there are examples in the South East where this has already worked successfully, if wider arrangements are ineffectual or lack support, for some issues, such as renewable energy, biodiversity enhancement</p>

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		<p>frameworks, legislative regimes, and partnerships can help enable the protection and enhancement of the environment and ensure sustainable development.</p> <p><b>English Heritage</b> notes that since the previous consultation the National Planning Policy Framework has been published, clarifying and strengthening the historic environment within the sustainable development agenda, in particular they welcome Paragraph 7 of the National Planning Policy Framework. <b>English Heritage</b> also note the National Planning Policy Framework lacks the specificity of the South East Regional Strategy, it embeds the historic environment within sustainable development as a core planning principle.</p> <p><b>Mid Sussex District Council</b> states during the Strategic Environmental Appraisal process, it is clear that there are very few cases where revocation of policies will have a negative environmental effect overall, due to mitigation through the National Planning Policy Framework and individual local plans.</p> <p><b>Milton Keynes Council</b> states the revocation is recognised as leading to uncertainty and minor</p>	<p>or landscape conservation, their potential will not be realised.</p> <p>This response also sets out that local plans are being brought forward. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will cease to apply. From March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p>

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		<p>negative effects as a result of the impacts of new development and urban intensification, the locations of which are unknown, however this is mitigated by in the medium to long term by local knowledge based planning to meet assessed need in accordance with the National Planning Policy Framework.</p> <p><b>Aspley Guise Parish Council</b> consider that using up to date data to assess need for both housing and employment as required by the National Planning Policy Framework following revocation of the South East Plan will result in considerable benefit as shown in the report.</p> <p><b>RenewableUK</b> believe the updated Environmental Report relies on impacts being mitigated by the National Planning Policy Framework. However they consider that revocation will have a detrimental effect on the deployment of onshore wind, CO2 emission reductions and climate change mitigation.</p> <p><b>GVA</b> (on behalf of Barwood Land and Estates Ltd) consider that the Strategic Environmental Assessment relies on a unrealistic extent on the ability and intention of local planning authorities to</p>	

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>bring forward appropriate and robust local plan policies in a timely manner that will not delay the provision of objectively assessed housing needs and economic development objectives set out in the National Planning Policy Framework.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) state the view that the quantified and spatially specific policies are not as easily ‘replaced’ by the National Planning Policy Framework.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) note the findings of the Environmental Report that ‘there is some uncertainty about whether the benefits from application of the National Planning Policy Framework will be realised in the short term’ and consider that the degree of uncertainty would be significant. They consider that the Assessment’s summary of the effects of revocation against retention in respect of Housing does not appropriately reflect the potential negative effects.</p>	
9.	<b>Monitoring</b>	<b>Environment Agency</b> welcomed the monitoring recommendations in the report, and those already in place to understand compliance with the Duty to	The National Planning Policy Framework (paragraphs 126 – 141) illustrate the key role which local planning authorities have through the

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Cooperate. Recommend monitoring of highly complex, cumulative effects on issues such as climate change, water quality and water resource.</p> <p><b>English Heritage</b> proposed the use of Heritage at Risk data as an additional monitoring indicator.</p> <p><b>Town and Country Planning Association</b> welcomes the identification of proposed monitoring indicators (Table NTS4). It is unclear how this monitoring process will be undertaken except for a statement that DCLG will make “periodic references” to such matrices using certain data sources.</p> <p><b>RenewableUK</b> welcomes the provisions on monitoring in the report, especially those for the monitoring of greenhouse gases, but the provision of renewable energy infrastructure needs to be monitored as well.</p> <p><b>Town and County Planning Association</b> welcomes the fact that a range of proposed monitoring indicators are set out, however comment that it is unclear how this information will be brought together and where it will be published. The Town and Country Planning Association recommends that the Government monitors the</p>	<p>development management decisions they take and local plans they prepare in conserving and enhancing the historic environment. Naturally local planning authorities will wish to monitor the impact of the planning system upon the conservation and enhancement of the historic environment in their localities as well as cumulative effects on issues such as climate change, water quality and water resource. Local planning authorities must report on their performance against the Duty to Cooperate in their monitoring reports.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan to revoke the South East Regional Strategy is set out in this Post Adoption Statement at Chapter 6 and Annex C.</p> <p>This monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts, including the Department for Communities and Local Government’s commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. If, as a result of</p>

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		<p>effectiveness of the new strategic planning system and not the loss of the regional strategy and makes a commitment to review the arrangements within a prescribed period if they are in danger of not delivering.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) believes it appropriate to undertake robust monitoring of the proposal to revoke the South East Plan. Through monitoring, the process of ensuring adequate up to date plan coverage and the overall net effect on planned housing may be determined, and action taken accordingly, for example, in judging how effective the Duty to Cooperate is with achieving further aspects of the South East Plan as directed by progress of local plan making.</p>	<p>monitoring it becomes apparent that implementation had led to significant negative environmental effects, the Government will consider measures to address or mitigate those effects.</p> <p>Local planning authorities produce monitoring reports on the implementation of their local plan. This data can be used to flag up the need to review policies within their plan. If local planning authorities working collaboratively wish to pool their resources to produce joint local plan monitoring and annual reporting mechanisms they can do so.</p> <p>The Government notes that RenewableUK welcomes the provisions which have been made on monitoring in the update Environmental Report and their request for provision of monitoring of renewable energy infrastructure, and from English Heritage about the use of the Heritage at Risk register.</p>
10.	<b>Individual Topics</b> <b>Housing</b> <b>(support Plan to</b>	<b>Arun District Council</b> welcomes the positive steps being taken to revoke the regional strategy so that decisions on the appropriate level of housing to meet local needs can be taken at a local level.	Comments noted. A further response on housing matters is given below in line 11 of this table below.



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	Revoke)	<p><b>Arun District Council</b> supports the full revocation of the South East Plan and the intention for sustainable growth to be determined at a local level. They believe that the retention of any out-dated targets, particularly in relation to housing, of any kind would be counter to the intention to allow decisions to be made at the local level.</p> <p><b>Basingstoke and Deane Borough Council</b> supports the revocation of the South East Plan in terms of allowing local authorities to set a housing target based on local need. The council agrees with the comments in the report that a locally-led approach could ensure that the adverse effects of housing and employment allocations are more effectively mitigated based on a more detailed understanding of local capacity issues.</p> <p><b>Mid Sussex District Council</b> stated that it supports the environmental appraisal of Policy H1 (Regional Housing Provision 2006-2026) and Policies GAT1 (Core Strategy), GAT2 (Economic Development), GAT3 (Housing Distribution) which advocates their revocation. Mid Sussex District Council agrees with the assessment of the Strategic Environmental Assessment that Policy H1 (Regional Housing Provision 2006-2026) is in conflict with the National Planning Policy Framework in that it sets out</p>	

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		<p>housing requirements, rather than letting local planning authorities objectively assess them themselves. Mid Sussex District Council goes onto state in terms of Economic Growth, the housing requirement determined by the Local Housing Assessment is founded upon a 3% increase in Gross Value Added per annum. The modelling undertaken for the Local Housing Assessment uses more up-to-date economic activity and employment information than the South East Plan and therefore reflects more accurately the needs of the population as at the current time. It welcomes the positive steps now being taken to revoke the regional strategy so that decisions on the appropriate level of housing to meet local needs can be taken at the local level. The revocation of the South East Plan will enable Mid Sussex to progress the preparation of its local plan, to enable a clear strategy for growth to be put in place and delivered.</p> <p><b>Woburn Sands and District Society</b> stated that local planning authorities are able to assess the housing need for their area in these changed economic times and prepare evidence, based local plans that comply with the the National Planning Policy Framework without centrally dictated regional strategies requiring unachievable and</p>	

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		undeliverable housing targets.	
11.	<p><b>Individual Topics</b></p> <p><b>Housing (including Partial retention of the South East Regional Strategy )</b></p>	<p><b>GVA</b> (on behalf of Barwood Land and Estates Ltd) note that the Strategic Environmental Assessment identifies that under revocation, the loss of the South East Plan policies will have an adverse effect on the timing of the delivery of housing and economic growth as there would be a delay to implementation of such developments while new policies are adopted across the region. In Barwood Land's opinion the revocation of the South East Plan will have a negative impact on the ability of local planning authorities to achieve the necessary levels of housing and economic growth supported by the National Planning Policy Framework.</p> <p><b>Kent County Council</b> considers that the report is optimistic in its assumption that local communities will be able to plan effectively for housing provision, and that Local Enterprise Partnerships will deliver strategic transport needs and note its reliance on the duty to co-operate to resolve cross-border issues, even though these mechanisms are untested.</p> <p><b>Gleeson Developments</b> express concern that recently adopted housing figures will be diluted, contrary to the National Planning Policy Framework</p>	<p>Comments noted.</p> <p>The Government proposed the plan to revoke the South East Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework, including clear policies protecting National Parks. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>as a result of the revocation of the South East Plan.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) request that the Government on a transitional basis should retain housing policies from the South East Plan in particular Policy H1 (Regional Housing Provision 2006-2026). Transitional arrangements could include retention of the relevant policies for a published period of time or until superseded by an up to date locally produced local plan.</p> <p><b>Kent County Council</b> sees merit in the retention of the South East Plan housing targets and the provisions of the sub regional strategies for those Districts that do not have up to date local plan targets until new local plans have been adopted that comply with national policy.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt,</p>	<p>impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the statutory duty to co-operate, legal and procedural requirements, and whether it is sound.</p> <p>Disagree.</p> <p>The Government does not agree with the proposals to retain housing policies and targets in the South East Regional Strategy. Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the Plan to Partially Revoke the South East Regional Strategy in the light of the other reasonable alternatives dealt with including retention for a transitional period of policies which set the quantum for development or which are spatially specific.</p> <p>Section 2.4 of the Environmental Report makes clear that Regional Strategies have not led to the expected level of plan provision for housing. Regional Strategies set housing targets on the basis that these would be incorporated into plans by local authorities, and that the market would</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>David Wilson, Crest Nicholson and Wates) presents information which they consider illustrates that without the South East Plan being in place local planning authorities will deliver fewer planned housing numbers. Savills state it is demonstrated from their analysis that not only has planned housing (2006-2026 equivalent) fallen, but that of the 32 local planning authorities yet to adopt 'new style' plans, 18 propose lower levels of planned housing and of these 18, 12 local authorities propose plans with at least 50 dwellings per annum fewer.</p> <p><b>Savills and DAC Beachcroft</b> state that there is a real risk that the total planned levels of annual housing (locally derived) will fall below both the planned housing of the South East Plan and also the real level of delivery. They propose a solution to retain the South East Plan to combine up to date evidence with (and consequent policy) alongside the consideration (as a matter of fact and degree) of the issue of general conformity with the Regional Plan. In consequence, the South East Plan would effectively act as the benchmark against which up to date plans may be assessed, thus avoiding the prospect of lower levels of planned housing.</p>	<p>deliver them. The data presented by Savills is from April 2012. At January 2013, across the South East of England region, 12 councils have adopted Local Plans since May 2011, compared with 23 councils that had adopted local plans over the previous 7 years; 51% of local planning authorities in the South East have adopted a local plan (Core Strategy) under the Planning and Compulsory Purchase Act 2004.</p> <p>The Government notes the data and analysis presented by Savills and that most of the difference identified between the targets in the Regional Strategy and Local Plans are those which have not been tested through an Examination in Public. New Plans need to take account of the most up to date evidence. The South East Regional Strategy target is based on 2006-based household projections. Whilst, for the region as a whole, the 2008-based projections target remained the same at 39,000 households, 2011-based projections are due to be published in March 2013.</p> <p>The National Planning Policy Framework and the duty to co-operate address these housing issues. The Framework asks authorities to use their evidence base to ensure that their Local Plan</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>GVA</b> (on behalf of Barwood Land and Estates Ltd) consider that if the South East Plan is revoked that this should be on the basis that local planning authorities must swiftly prepare and adopt local plans including the significant levels of growth envisaged on the South East Plan in order to avoid the negative effects of revocation on the provision of much needed housing and employment identified in the Strategic Environmental Assessment.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) states in accordance with the position outlined, Savills</p>	<p>meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (including, for example, those on environmental designations). They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>If, as a result of monitoring of the effects it becomes apparent that implementation has led to significant negative environmental effects, the Government will consider whether any further measures or mitigation is needed.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>disagrees with the conclusion in respect of Human Health that 'revocation will not remove the need for more housing in the region'. This depends on the meaning of 'need' and effect in respect of planned housing, which Savills suggests the evidence they provide demonstrates has fallen.</p> <p><b>Gleeson Developments</b> expressed their concern that local planning authorities will see the revocation of the South East Plan as removing the pressure to deliver the much needed housing requirements.</p>	<p>Comment noted.</p> <p>Page 91 of the updated Environmental Report states that: 'Revocation of the South East Plan will not remove the need for more houses within the South East region... Current housing completion rates have clearly diverged from those anticipated in the annual targets contained in the Plan. Whilst the South East saw the largest number of new build homes completed in the 12 months to March 2012 with 22,240, this figure compares to policy H1 which had a net annual average provision of 32,700.' Within the context of the paragraph and the highlighted disparity between completions and planned provision, need refers to the unfilled gap between the two.</p> <p>Comment noted.</p> <p>The National Planning Policy Framework and the duty to co-operate require that local planning authorities use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Gleeson Developments</b> state that they are already experiencing many local planning authorities using existing environmental designations as reasons for not delivering development in accordance with recognised needs.</p>	<p>(including, for example, those on environmental designations). They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>Comment noted.</p> <p>The legal requirement for local planning authorities to ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation is unchanged by revocation.</p> <p>The National Planning Policy Framework also makes clear that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. The National</p>



No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Gleeson Developments</b> expressed concern in relation to housing provision that the duty to co-operate is not being practiced in reality with many local planning authorities viewing consultation with neighbours as satisfying this duty. Without an overarching view of regional housing delivery there is a real possibility of an undelivered housing need. The issue which needs to be carefully considered is how the 'passing' of housing numbers between local planning authorities can be policed as authorities seek to pass their undelivered requirements to a neighbouring authority.</p>	<p>Planning Policy Framework also makes clear that the planning system should contribute to and enhance the natural environment, including by protecting and enhancing valued landscapes, minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>Comment noted.</p> <p>This echoes the point made on page 174 of the updated Environmental Report, 'In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create disparities which are difficult to reconcile without significant interventions.'</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p>
12.	<p><b>Individual Topics</b></p> <p><b>Thames Basin Heaths Special Protection Area (Policy NRM6)</b></p>	<p><b>Royal Society for the Protection of Birds</b> stated that alongside Natural England and 11 local planning authorities with an interest in the Thames Basin Heaths Special Protection Area, it has dedicated a considerable amount of time and resource in establishing a robust approach to the protection of this area from the threat of increased recreational pressure from high levels of new housing in the surrounding area. The Society notes that Policy NRM6 (Thames Basin Heaths Special Protection Area) marked a significant step forward in the incorporation into statutory policy of an agreed, multi-authority approach to the avoidance and mitigation of these pressures.</p> <p><b>Royal Society for the Protection of Birds</b> goes on to note many of the 11 local planning authorities now have adopted policies within their Core Strategies that reflect the key principles of Policy</p>	<p>The Government notes the requests for partial retention of policy NRM6 (Thames Basin Heaths Special Protection Area). Policy NRM6 in the Regional Strategy specifically covers the Thames Basin Heaths Special Protection Area. This specific policy has been put in place given the scale and location of the Special Protection Area in relation to existing housing and housing targets set in the South East Plan.</p> <p>The policy sets out the principles for avoidance and mitigation measures, including the approach to Suitable Accessible Natural Greenspace, which are further detailed in the Thames Basin Heaths Special Protection Area Delivery Framework, endorsed by the Thames Basin Heath Joint Strategic Partnership Board. The policy requires the principles set out in the Thames Basin Heaths Special Protection Area</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>NRM6 (Thames Basin Heaths Special Protection Area). But for those authorities that have not yet to adopt a comprehensive policy reflecting the key principles of Policy NRM6, the revocation of the South East Plan will create significant uncertainty as regards their ability to enforce the agreed approach to the protection of the area. This could lead to damaging precedent being set by individual developments, which could in turn start to undermine the whole agreed approach.</p> <p><b>Surrey Heath Borough Council</b> and the <b>Thames Basin Heaths Joint Strategic Partnership Board</b> (hosted by Surrey Heath Borough Council) makes the case that, in order to mitigate uncertainty it considers that Policy NRM6 (Thames Basin Heaths Special Protection Area) should be retained along with partial retention of policies H1 (Regional Housing Provision 2006-2026), LF3 (Broad Amount and Distribution of Future Housing Development) and WCBV3 (Scale and Distribution of Housing Development). This uncertainty is noted particularly in terms of housing targets for those local authorities affected by the Thames Basin Heaths Special Protection Area. The <b>Royal Society for the Protection of Birds</b> also suggest retention of</p>	<p>Delivery Framework to be incorporated into local authorities' local development frameworks. The Thames Basin Special Protection Area Heaths Delivery Framework approach is intended to attract new residents away from the protected area and is funded by developer contributions or, alternatively, can be provided by developers for individual developments. Through providing or contributing to measures to ensure that they have no likely significant effect on the Special Protection Area, residential developments do not have to undergo an appropriate assessment in accordance with the requirements of the European Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations 2010. The policy provides one possible mechanism for protecting the European site, but revocation of the policy does not affect the legal or national planning policy requirement to protect the Special Protection Area. Policy NRM6 also states that where developers propose a bespoke solution, this will be assessed on its own merits under the Habitats Regulations.</p> <p>The revocation of the Regional Strategy for the South East of England does not therefore affect</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Policy NRM6 (Thames Basin Heaths Special Protection Area), at least for a transitional period to allow each of the Thames Basin Heaths local planning authorities time to adopt a suitable replacement policy. The <b>Town and Country Planning Association</b> recognise this policy as a key environmental policy whose retention was not assessed, despite noting that some uncertainty remains as to the precise arrangements for cooperation between local planning authorities under the Joint Strategic Partnership Board formed in 2009.</p>	<p>the national policy requirement to protect the Special Protection Area, or the legal requirements set out in the Conservation of Habitats and Species Regulations 2010. Any local planning authority, in exercising any of their functions must have regard to the requirements of the European Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC). This includes the assessment of implications for European sites (such as the Thames Basin Heaths Special Protection Area) of any plan or project, which is likely to have a significant effect on it, before it proceeds in accordance with the Habitats Directive. Local Plans, prior to adoption will be subject to such assessment. Legislation is in place which requires Natural England to be consulted in respect of development that is likely to affect the Thames Basin Heaths.</p> <p>We do not agree with the Town and Country Planning Association's comment that the retention of Policy NRM6 was not assessed. The effects of retention and revocation of policy NRM6 were assessed in Appendix D to the updated Environmental Report (along with the other 179 policies that make up the Regional</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Strategy). The assessment identified that the effects of retention are likely to be significant positive effects for biodiversity and landscape and positive for soil and cultural heritage, but that the policy has the potential to have a negative effect on the housing supply in the locality of the Special Protection Area. The assessment also identified that for revocation the location of development will be a matter for the Local Plans to take forward in the context of the National Planning Policy Framework's policy framework, the requirements of the Thames Basin Heaths Special Protection Area Delivery Framework and wider International and government legislation and policy which should maintain the positive effects associated with retention of the policy.</p> <p>The updated Environmental Report states that "specific policies were introduced under the South East Plan to avoid effects on identified European designated conservation sites, such as the Thames Basin Heaths Special Protection Area. For the Thames Basins Heaths Special Protection Area this will be continued through the mitigation strategy contained in Thames Basin Heaths Special Protection Area Delivery</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Framework and implemented by the Thames Basin Heaths Joint Strategic Partnership. Ongoing implementation will however require continued co-operation between members in the Partnership”.</p> <p>Of the 11 local authorities that make up the Thames Basin Heaths Joint Strategic Partnership Board: 6 have adopted local plans which have reflected policy NRM6: 2 have emerging local plans that are close to adoption which also have policies which reflect Policy NRM6; the remaining 3 local authorities have supplementary planning documents which reflect the NRM6 Policy. These 3 local authorities are now in the process of preparing updated local plans which also contain policies on the protection of the Thames Basin consistent with NRM6</p> <ul style="list-style-type: none"> <li>• Windsor and Maidenhead are currently preparing a draft local plan for consultation in Summer 2013..</li> <li>• Runnymede proposes to consult on draft submission core strategy /local plan in January 2013</li> <li>• Guildford expect to consult on pre</li> </ul>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>submission core strategy/local plan in Spring 2013</p> <p>The Government agrees with the updated Environmental Report which sets out that that revocation of this policy would not have adverse effects, and given the measures in place set out above does not consider revocation to have likely significant effects on the Special Protection Area. The Government does not consider it necessary to save Policy NRM6, or other policies, to mitigate environmental effects (as identified in the updated Environmental Report), or for mitigation necessary to comply with requirements of the Habitats Directive.</p> <p>However the responses received question the impact of revocation until the Delivery Framework is incorporated into all relevant Local Plans. The Government notes the points made by Surrey Heath Borough Council, the Joint Strategic Partnership Board, Royal Society for the Protection of Birds and the Town and Country Planning Association. Comments were made particularly about the timing of revocation and the desirability of having policies in place that support the framework in order to provide clarity and use</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>of the framework as an efficient means of achieving the objectives it sets out. Comments were particularly made about the significant time and resource put into developing the approach that is in the Policy and Framework document.</p> <p>Given the importance of the Thames Basin Heaths Special Protection Area, the consultation responses on this issue, and the intentions of local planning authorities bringing forward local plans in line with policy NRM6, the Government proposes to retain Policy NRM6. While considering that the co-operation required to implement the framework will be carried out under the duty to co-operate, the Government proposes to respond to the responses to consultation on the updated Environmental Report by retaining the Policy in order to assist those local authorities bringing forward up to date local plan which incorporate the mitigation strategy contained in Thames Basin Heaths Special Protection Area Delivery Framework. This approach reflects the fact that the policy as an agreed multi-authority approach which has been subject to significant joint working, and where a joint structure is in place (the Joint</p>



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			<p>Strategic Partnership Board) which requested that the policy be saved. No responses supporting revocation of this policy were received.</p> <p>The Government notes the request by Surrey Heath Borough Council and the Joint Strategic Partnership Board for the partial retention of policies H1 (Regional Housing Provision 2006-2026), LF3 (Broad Amount and Distribution of Future Housing Development. The Government does not consider partial retention of these policies to be necessary. The National Planning Policy Framework clearly sets out that Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change, and where the development plan is absent, silent or relevant policies are out-of-date, granting permission, unless (in both cases) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the other policies in the National Planning Policy Framework taken as a whole; or specific policies in the National Planning Policy Framework indicate development should be restricted. The National Planning</p>

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			Policy Framework is clear that examples are those policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest.
13.	<p><b>Individual Topics</b></p> <p><b>Partial retention of the South East Regional Strategy</b></p>	<p><b>Campaign for the Protection of Rural England Hampshire</b> consider that there could be a partial revocation so that all quantified policies or policies that are spatially specific and which allocate a quantum of development or land for development to a particular location or local authority in the region (South East Plan policies for housing allocations; employment, minerals allocations; waste disposal) would be revoked, but that the non spatial policies would be retained. They consider that this would leave policies in place which would set out a spatial vision for the region, as well as policies that encourage particular types of development or seek to protect environmental resources and services as well as seeking wider sustainability objectives.</p> <p><b>Mr G.Phillips</b> raises doubts that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries on a sufficiently large scale. Therefore the South East Plan should be retained for a five to ten year transitional period as</p>	<p>Disagree.</p> <p>The Government does not believe that retaining the the whole or elements through a partial revocation of the South East Plan (as identified by the Campaign for the Protection of Rural England Hampshire, Mr G.Phillips and Savills) even for a transitional period of 2 or 3 years, or a period of 5 to 10 years as suggested by Mr G.Phillips, is necessary because the duty to co-operate has been in place since March 2012 and is underpinned by the National Planning Policy Framework. The duty provides a robust vehicle for local planning authorities and other bodies identified under the duty to deliver cross-boundary strategic planning where needed, so as to inform the preparation of local plans.</p> <p>Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>up to date local plans are prepared.</p> <p><b>Mr G. Phillips</b> believes the policies in the South East Plan relating to the review of Green Belt boundaries around Guildford and an urban extension to the north-east of Guildford should be deleted.</p>	<p>policy) , in the light of the other reasonable alternatives dealt with including partial revocation.</p> <p>Comment noted.</p> <p>The South East Regional Strategy policies relating to a selective review of the Green Belt to the north east of Guildford were subject to a successful legal challenge, as set out at pages 21-22 of the updated Environmental Report. The case was settled by a Sealed Consent Order which directed that the relevant parts of the Plan were remitted to the Secretary of State to be treated as not having been approved or adopted.</p>
14.	<p><b>Individual Topics</b></p> <p><b>Partial retention of the South East Regional Strategy: Parking</b></p>	<p><b>Mr J.D.I. Baker</b> considers that the effects of revoking Policy T4 (Parking) have not been properly assessed in the updated Environmental Report and that it should be retained in order to encourage modal shift by supporting an increase in parking where needed at rail stations. He notes that the duty to co-operate applies at local plan making stage, and not to the taking of development control</p>	<p>Comments noted.</p> <p>The Government notes Mr Baker's comments and arguments for retaining Policy T4 (Parking), but do not agree with him that this Policy T4 (Parking) should be retained in isolation.</p> <p>The effects of retaining and revoking Policy T4 are outlined on pages 79-80 of Appendix D of the updated Environmental Report. Under the</p>

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		<p>decisions. He also considers that amendments should be made to pages 79 and 80 of Appendix D, and 93, 94 and 179 of the updated Environmental Report to reflect this.</p>	<p>assessment of revocation of the policy, it notes that ‘... an increase in parking provision over and above Policy T4 standards could encourage significantly more trips by car and a corresponding rise in pollution harmful to human health, depending on where the development was located. The National Planning Policy Framework is clear that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.’ Page 94 of the updated Environmental Report also states: ‘In preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport’. Encouraging modal shift is an important aspect of transport policy reflected in the National Planning Policy Framework referenced throughout this section of the updated Environmental Report (93-95).</p> <p>The strategic transport issues covered Policy T4 (Parking) can be adequately addressed through local planning authorities and the other bodies covered by the duty to co-operate which include transport bodies such as the Office of Rail</p>

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			<p>Regulation, the Highways Agency; Transport for London; Integrated Transport Authorities; and Highway authorities, within the transport planning policy context set out in paragraphs 29 to 41 of the National Planning Policy Framework.</p> <p>Chapter 5 of this Post Adoption Statement sets out the reasons for choosing the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy), in the light of the other reasonable alternatives dealt with including partial revocation.</p>
15.	<p><b>Individual Topics</b></p> <p><b>Partial retention of the South East Regional Strategy: Renewable Energy</b></p>	<p><b>RenewableUK</b> consider the loss of regional strategies will not be helpful in meeting the challenge of Climate Change and will affect the speed and effectiveness of reducing carbon dioxide emissions and renewable energy deployment at the local level. They consider that this will have an effect on the environment and human health and wellbeing.</p> <p><b>RenewableUK</b> states removal Policies NRM13 (Regional Renewable Energy Targets), NRM14 (Sub-Regional Renewable Energy Targets), NRM15 (Location of Renewable Energy Targets), NRM16 (Renewable Energy Development Criteria)</p>	<p>Comment noted.</p> <p>The Government does not believe that retaining the Policies NRM13 (Regional Renewable Energy Targets), NRM14 (Sub-Regional Renewable Energy Targets), NRM15 (Location of Renewable Energy Development), NRM16 (Renewable Energy Development Criteria) is necessary because It will be for local planning authorities to determine local responses to the issue of renewable energy generation consistent with the National Planning Policy Framework.</p> <p>Assessment of the revocation of NRM13</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>from the South East Plan will mean that local planning authorities have nothing to work towards on a local level to deliver renewable energy infrastructure, and raise concern about the application of local policy. They also note there has been no guidance from Government on how national targets need to be transferred and applied locally. Therefore they state that these four policies from the South East Plan should be saved.</p>	<p>(appendix D, page 149 of the updated Environmental Report) notes: 'The renewable energy policy in all adopted local plans and/or core strategies in the region have been examined and are presented in Appendix C. The renewable energy policy sets a regional target and does not apportion this target between local authorities. The analysis shows that, consistent with that approach, local plans and/or core strategies do not tend to therefore include targets for the production of renewable energy at local authority level, although a few (four) do'. Evidence would therefore suggest that of the 42 authorities that do have some such renewables policy very few then seek to frame that at the local level.</p> <p>The National Planning Policy Framework includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to '...encourage the use of renewable resources (for example, by the development of renewable energy)'. It makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising</p>

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			<p>vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>The National Planning Policy Framework also contains a number of policies aimed at encouraging the development of renewable energy installations including that local planning authorities should: 'have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.' In addition, National Planning Policy Framework policies on strategic planning for</p>

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			<p>infrastructure include the need to plan for energy infrastructure including heat.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.</p> <p>Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>The Government has responded to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement, which included the finding that if wider arrangements such as the duty to co-operate are ineffectual or lack support, for some issues such as renewable energy their potential will not be realised.</p>



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16.	<p><b>Individual Topics</b></p> <p><b>Retention or partial retention of the South East Regional Strategy: Housing (Milton Keynes)</b></p>	<p><b>Januarys</b> disagree with the comments in the updated Environmental Report that the National Planning Policy Framework would boost the supply of housing if the regional framework was revoked as although it seeks to increase the supply of housing, it is the development plan – which includes the regional strategy – that defines housing targets. It is the regional strategy that contains the housing target against which the housing delivery is monitored, and is used to determine whether a deliverable five year housing land supply in a local planning authority area.</p> <p>January's therefore:</p> <ul style="list-style-type: none"> <li>• Request that the Regional Strategy is retained;</li> <li>• If it is decided that the Regional Strategy should be revoked, then it is retained until such time as relevant policies have been replaced by a sound local plan. In particular Januarys suggest that Policy MKAV1 (Housing Distribution by District 2006-2026) should be retained until the housing targets it contains have been replaced by policies in a 'sound' local plan, and that Policy MKAV2 (Spatial Framework for Milton Keynes</li> </ul>	<p>Comments noted.</p> <p>The Government notes the observations made by the planning consultants Januarys on behalf of their clients the South West Milton Keynes Consortium regarding two policies, Policy MKAV1 (Housing Distribution by District 2006-2026) and Policy MKAV2 (Spatial Framework for Milton Keynes Growth Area), making the case that the South East Regional Strategy in particular Policies MKAV1 and MKVA2 be retained until up to date local plans are put in place.</p> <p>The Government does not agree that there is a need to retain the South East Regional Strategy or Policies MKVA1 and MKVA2 even for a transitional period until local planning authorities prepare up to date local plans. The Government believes the National Planning Policy Framework and the duty to co-operate address these housing issues. The National Planning Policy Framework makes it clear that local planning authorities, including National Park Authorities, should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These</p>

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		<p>Growth Area) should be retained until a revised development strategy has been approved in a 'sound' local plan.</p> <p>They consider that this approach would retain an appropriate policy framework which would encourage local planning authorities that wish to review their housing targets to make quicker progress in preparing their local plans, and would mean that the positive sustainability benefits would remain in place.</p>	<p>strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework, including clear policies protecting National Parks. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound.</p>

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			<p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will cease to apply. From March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning</p>

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			<p>Policy Framework the greater the weight that may be given.</p> <p>Delivery of plans is increasing: – across the South East of England region 12 councils have adopted Local Plans since May 2011, compared with 23 councils that had adopted local plans over the previous 7 years. In the South East 51% of councils have a plan adopted post-2004 and overall 74% of councils now have a published plan.</p> <p>The Government has responded to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement, which included the finding that there may be more uncertainty about the nature and scale of positive and negative impacts on the Strategic Environmental Assessment topics in the short and medium term due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities.</p>
17.	<b>Individual Topics</b>	<b>New Forest National Park Authority</b> cites Policy C1 (The New Forest National Park) in the South East Regional Strategy and notes that this policy	Disagree. Local planning authorities responsible for areas

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>The New Forest National Park</b></p>	<p>recognises the need to protect areas outside the National Park as ‘back-up’ commoning land to sustain grazing in the open forest and states that surrounding planning authorities when making planning decisions should have regard to the ‘setting’ of the National Park. The Authority notes that surrounding planning authorities have not repeated Policy C1 in their emerging development plans. They raise concern that revocation of the regional strategy will remove these important safeguards for back-up grazing land and the setting of the National Park, and that this results in a significant policy gap. The Authority request consideration is given to retaining those elements of Policy C1 which aim to protect back-up grazing land and the setting of the New Forest National Park.</p> <p><b>South Downs Society</b> raised concern that the National Planning Policy Framework does not include a specific reference to the need to protect the setting of National Parks and Areas of Outstanding National Beauty, whereas the South East Plan incorporates a specific policy influencing planning policy and development management outside these protected landscapes. The Society are concerned that this weakens the commitment to</p>	<p>bordering National Park boundaries must have regard to section 62 of the Environment Act 1995, which inserts a new section 11A into the National Parks and Access to the Countryside Act 1949. This provision creates a new statutory duty, not only on National Park Authorities but also other ‘relevant authorities’ - which include all public bodies and therefore all local authorities - to have regard to the purposes of designation when exercising or performing any functions in relation to, or so as to affect, land in a National Park. In fulfilling this duty local planning authorities should take account of the National Planning Policy Framework, which states that the planning system should protect and enhance valued landscapes, and that great weight should be given to conserving landscape and scenic beauty in National Parks. Moreover, National Park Authorities are a statutory consultee on planning applications that could affect a National Park. They should respond, setting out their case, if they consider that any impacts would compromise the purposes of National Park designation.</p> <p>The Government recognises the importance of strategic planning and the National Planning</p>

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		these special places.	<p>Policy Framework also makes it clear that strategic priorities across local boundaries are to be properly co-ordinated and clearly reflected in individual local plans. The scale and form of development that would be considered acceptable on the boundaries close to a National Park is one example of the kind of strategic planning issue that local planning authorities, including National Park Authorities, will have to work on collaboratively under the duty to co-operate.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The</p>

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			<p>stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Issues on which the duty to co-operate could provide joint approaches across local authorities might include the need acknowledged by the New Forest National Park Authority to protect areas outside the National Park as 'back-up' commoning land to sustain grazing in the open forest. Failure to demonstrate compliance with the duty to co-operate may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such it may be found unsound.</p> <p>As a further check, the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and regulations made under toe 2004</p>

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			<p>Act require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty to cooperate applies to local planning authorities, including National Park Authorities, county councils and public bodies that are prescribed in Local Planning Regulations 2012. These bodies are:</p> <ul style="list-style-type: none"> <li>• the Environment Agency;</li> <li>• the Historic Buildings and Monuments Commission for England (English Heritage);</li> <li>• Natural England;</li> <li>• the Mayor of London;</li> <li>• the Civil Aviation Authority;</li> <li>• the Homes and Communities Agency;</li> </ul>



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			<ul style="list-style-type: none"> <li>• Primary Care Trusts;</li> <li>• the Marine Management Organisation</li> <li>• the Office of Rail Regulation</li> <li>• the Highways Agency;</li> <li>• Transport for London;</li> <li>• Integrated Transport Authorities; and</li> <li>• Highway authorities</li> </ul> <p>The Localism Act also provides an enabling power requiring the bodies that are subject to the duty to have regard to the activities of other bodies when they are preparing their local plans and related activities. Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning Policy Framework states that local planning authorities should set out the strategic priorities for their area</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>in their Local Plan. Those local authorities adjacent to the National Parks should set out a scale and form of development that would be considered acceptable on the boundaries of a National Park, having regard to national planning policy and the duty under section 62 of the Environment Act 1995 explained above. Other priorities could include the conservation and enhancement of the natural and historic environment, including protection of the landscapes which border the boundaries of National Parks.</p>
18.	<p><b>Individual Topics</b> <b>Historic Environment</b></p>	<p><b>Kent County Council</b> believes the loss of the South East Plan will impact on the Historic Environment. As the Kent &amp; Medway Structure Plan no longer exists at a county level there are no higher policies for the historic environment between the National Planning Policy Framework and local plans, which vary in their policy for the historic environment and do not provide comprehensive coverage of the County because they are at different stages of completion. It is therefore suggested that the historic environment policies are retained to ensure appropriate safeguarding of the historic environment within the region.</p>	<p>Comments noted.</p> <p>Paragraphs 126 – 141 of the National Planning Policy Framework illustrate the key role which local planning authorities have through the development management decisions they take and the local plans they prepare in conserving and enhancing the historic environment. English Heritage is identified as one of the bodies which local planning authorities through the duty to co-operate should work with when preparing their local plans. English Heritage working with local planning authorities can promote policies which address the preservation and enhancement of</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			the cultural and historical assets such as historical landscapes and settlements, for example at the geographical scale of the Medway Ports.
19.	<p><b>Individual Topics</b></p> <p><b>Green Infrastructure and biodiversity</b></p>	<p><b>Kent County Council</b> states that there is sufficient provision within the National Planning Policy Framework taken together with non-Governmental guidance, to agree with the assesment that the revocation of this aspect of the South East Plan will not lead to significant negative effects on biodiversity, flora and fauna. However regarding Policy NRM5 (Conservation and Improvement of Biodiversity) the Council note the difficulty of continuing partnerships. They note that Local Nature Partnerships are untested and the duty to co-operate has uncertain outcomes. Kent County Council considers that there is sufficient doubt to require the consideration of a partial revocation of the South East Plan so that biodiversity policies can be retained while local plans are completed.</p>	<p>Comments noted.</p> <p>The Government notes Kent County Council’s statement that the revocation of the South East Plan will not have a significant negative impact on the biodiversity of the region, however disagrees with Kent County Council’s statement that Policy NRM5 (Conservation and Improvement of Biodiversity) should be retained while local plans are updated given the policies in place in the National Planning Policy Framework and broader Government policy on biodiversity.</p> <p>The Government has responded to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement. This includes the finding that whilst there are examples in the South East where co-operation has already worked successfully, if wider arrangements are ineffectual or lack support, for some issues such as biodiversity enhancement their potential will not be realised.</p>

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20.	<p><b>Individual Topics</b></p> <p><b>Policy vacuum created by revocation of the South East Regional Strategy</b></p>	<p><b>Kent County Council</b> states that the revocation of the South East Plan will leave in place saved local plan policies and adopted local plan documents. However the coverage of local plans is in part out of date and is not complete. A period will therefore exist before up to date local plan coverage is complete, and loss of the South East Plan policies may create a policy vacuum in some areas.</p> <p><b>Mid Sussex District Council</b> note the Strategic Environmental Assessment raises uncertainty over local planning authorities that do not have an adopted Core Strategy, or have an adopted Core Strategy that pre-dates the South East Plan. Whilst Mid Sussex falls into the former category, the draft District Plan is now at an advanced stage and will be submitted to the Secretary of State upon revocation of the South East Plan.</p>	<p>Comment noted.</p> <p>The Government notes that local planning authorities are at different stages of preparing and updating their local plans across the region. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will cease to apply. From March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p> <p>Delivery of plans is increasing - across the South East of England region 12 councils have adopted Local Plans since May 2011, compared with 23 councils that had adopted local plans over the previous 7 years. In the South East, 51% of councils have a plan adopted post-2004. And overall 74% of councils now have a published plan.</p>

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21.	<p><b>Individual Topics</b></p> <p><b>Assessing individual South East Regional Strategy policies in isolation</b></p>	<p><b>Town and Country Planning Association</b> stated the South East Plan gave a clear spatial steer that the majority of new development should be focussed in a network of sub regional hubs which provided maximum public transport connectivity. The Association state that the assessment identifies little or no difference in maintaining delivery of a concentrated pattern of new development between the retention and revocation alternatives, partly because individual policies are assessed in isolation without referring to the interrelationship with other policies necessary to support their delivery (e.g. the emphasis on urban focus and renaissance backed by a regional brownfield target, focussing transport investment on regional spokes between the hubs and guidance on suburban intensification and renewal).</p>	<p>Comment noted.</p> <p>Pages 85 – 86 of the updated Environmental Report summarise the effects of revocation of policies SP1–SP5 which set out the core Spatial Strategy for the South East based on six spatial planning principles underpinning the plan. The assessment concluded that revocation of the South East Plan core spatial policies would have either positive or have no overall effect for all the SEA topic areas. This resulting from a combination of factors. For example, the National Planning Policy Framework, the duty to co-operate, the role of Local Enterprise Partnerships and the status of adopted local plans.</p> <p>Section 4.4 ‘Secondary, Cumulative and Synergistic Effects’ and section 4.5 of the updated Environmental Report outlines the the wider implications and effects of revocation and retention of the South East Regional Strategy. This notes that:</p> <p>‘A number of issues are arguably more efficiently and effectively addressed across wider areas than individual local authorities such as major</p>

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			<p>infrastructure provision, biodiversity planning, climate change mitigation and adaptation, and renewable energy..... Macro-scale trends such as the decentralisation of population from urban areas are arguably more difficult to address through local initiatives, as is regeneration which might be more efficiently tackled through regional-scale policy. National transport policies such as HS2 and other measures to improve the effectiveness of national transport networks and the ease of accessibility between regions will become increasingly important to counter such potential effects.'</p> <p>The Government recognises that the duty to co-operate needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such it may be found unsound.</p>
22.	<p><b>Individual Topics</b> <b>Implications of revoking the South East Regional Strategy on other regions and neighbouring areas</b></p>	<p><b>Dorset County Council</b> considers that the assessment has not considered the knock-on effects for areas neighbouring the region where demand for growth is likely to be focussed. It assumes that demand will be met in the area where it arises, but with growing effectiveness of environmental constraints, the heavy cost of meeting strategic infrastructure needs and potential local opposition to growth, this assumption may be incorrect. If growth demands are not met where they arise they could spill over into neighbouring areas – leading to increased house prices and commuting levels in these areas.</p> <p><b>Dorset County Council</b> notes the Strategic Environmental Assessment does not appear to</p>	<p>Disagree.</p> <p>Section 4.4 ‘Secondary, Cumulative and Synergistic Effects’ of the updated Environmental Report provides explicit commentary on the wider implications and effects of the plan to revoke the Regional Strategies, acknowledging that the plan is national in scope as well as applying to the eight regions. This section of updated Environmental Report states:</p> <p>‘Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create disparities which are difficult to reconcile without significant</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>address the implications of the revocation of the South East Regional Strategy outside of the South East region. Dorset County Council has concerns about the balance of housing and economic aspirations in the South East Plan and the loss of evidence from revocation. The Council consider that given the concerns over the ability even to meet previous housing aspirations it is considered that there is real uncertainty about how the environmental consequences for neighbouring areas are to be addressed and the Strategic Environmental Assessment should make this clear.</p> <p><b>Milton Keynes Council</b> states overall the Strategic Environmental Assessment is supported subject to the factual corrections, although the inter and intra regional differences being potentially magnified does raise some concerns.</p> <p><b>Campaign for the Protection of Rural England Hampshire</b> state the revocation of the South East Regional Strategy is flawed, because the Strategic Environmental Assessment is weak in addressing how existing arrangements might be improved to ensure an approach to strategic planning which is rigorous and engages all sectors and fails to address how the Government should tackle regional and national disparities which will</p>	<p>interventions. At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution.'</p> <p>The Government notes that the National Planning Policy Framework clearly states that local planning authorities should positively seek opportunities to meet the development needs of their area, and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the National Planning Policy Framework taken as a whole, or specific policies indicate development should be restricted (such as: policies relating to sites protected under the Birds and Habitats Directives, designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park; designated heritage assets; and locations at risk of flooding</p>



No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		increasingly emerge.	<p>or coastal erosion).</p> <p>The Government recognises that the duty to co-operate needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The duty requires councils to demonstrate how they have complied as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>The Government has responded to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			including that over the medium and longer term, reliance on locally-generated policies and targets could yield an increasing difference between authority areas within regions and between regions, and that there could be an increasing diversification of regional circumstances across the country.
23.	<p><b>Individual Topics</b></p> <p><b>Water Management and Water efficiency</b></p>	<p><b>Environment Agency</b> notes that the South East is one of the driest regions of England and that a joint working approach already exists to address this issue through the Water Resources in the South East Group. The importance of this group in determining strategic water infrastructure is recognised in the Strategic Environmental Assessment.</p> <p><b>Environment Agency</b> welcomes the references in the updated Environmental Report to the Water Framework Directive and River Basin Management Plans. In the absence of the a strategic steer from the regional strategy they suggest that mechanisms are put in place to build and maintain knowledge of water management issues for local authority planners.</p> <p><b>Horsham District Council</b> states it has worked with water companies in Sussex in recent years</p>	<p>Comment noted.</p> <p>The Government welcomes the Environment Agency’s comment that the updated Environmental Report highlights the important role of River Basin Management Plans and that local planning authorities have a significant role to play in planning for managing water resources.</p> <p>The updated Environmental Report clearly set out requirements which apply beyond the National Planning Policy Framework, which itself clearly states that planning policy decisions must reflect and where appropriate promote relevant European Union obligations – which include, for example, obligations under the Water Framework Directive. The National Planning Policy Framework is also clear that local planning authorities should work with other bodies to assess the capacity of water supply and</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>have been undertaking measures to reduce water consumption (e.g. universal metering), and improving supplies, e.g. through the development of a new abstraction schemes. This work coupled with additional studies undertaken by this and other local authorities including the Gatwick Diamond Sub-Regional Water Cycle Study, and most recently the Council's Appropriate Assessment indicate that development in the District can be accommodated without adverse impact on water supplies. Revocation of the South East Plan is therefore unlikely to have a significant adverse impact in this respect within Horsham District.</p> <p><b>Mid Sussex District Council</b> states it is pleased that areas of joint working (such as the Gatwick Diamond and the Sub-Regional Water Cycle Study) have been recognised within the Strategic Environmental Assessment.</p> <p><b>Town and Country Planning Association</b> stated that water resources are a crucial environmental issue for this region and the Strategic Environmental Assessment recognises a requirement for a new water resources infrastructure under both the retention and revocation alternatives. The Town and Country Planning Association suggests there is a much</p>	<p>wastewater treatment infrastructure, and should set out in the Local Plan their strategic priorities and policies for the provision of such infrastructure. The Government welcomes the representations made by Horsham District Council and Mid Sussex District Council, which illustrates how local planning authorities working positively together can develop and implement policies which proactively manage valuable water resources.</p> <p>More generally, the National Planning Policy Framework state that local planning authorities should adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant obligations under European law – which include,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		greater risk of a significant negative effect from the revocation alternatives since there is a risk of more dispersed development in the absence of up-to-date local plans with the inherent difficulties of securing water efficiency in more dispersed small developments.	for example, obligations under the Water Framework Directive (2000/60/EC).
24.	<b>Individual Topics</b> <b>Flood Risk</b>	<b>Environment Agency</b> welcomes reference in the updated Environmental Report to the Flood Risk Regulations 2009 which place a duty on the Environment Agency and lead local flood authorities to work together to determine whether there are significant flood risks in an area, and if so to prepare flood hazard maps, flood risk management plans. The plans and strategies developed will provide a useful resource for planners.	<p>Comment noted.</p> <p>The Government welcomes the Environment Agency's comment regarding the updated Environmental Report's reference to the work of the lead local flood authorities</p> <p>The National Planning Policy Framework contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding also states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver, the provision of infrastructure for flood risk and coastal change management.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant obligations under European law – which include,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			for example, obligations under the Floods Directive (2007/60/EC).
25.	<p><b>Individual Topics</b></p> <p><b>Application of the Habitats Regulation Assessment</b></p>	<p><b>Natural England</b> recommended that the criteria used by the Department of Communities and Local Government in the Habitats screening process should be included in the Post Adoption Statement for the Strategic Environmental Assessment, in order to demonstrate that European protected habitats have been considered and are an important part of the evaluation process.</p>	<p>Comment noted</p> <p>Section 1.4 of the updated Environmental Report addresses the requirements of the Habitats Directive (92/43/EEC) and concludes that ‘the Government’s view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive’. This conclusion was reached on the basis of a screening exercise: each Regional Strategy policy was reviewed to identify those that referred to the protection of European sites and those which are locationally specific – i.e. they direct development to a particular parcel of land. Policies that were more pervasive in nature or provided a more general requirement for a local planning authority to make provision for a certain type or amount of development, were screened out at that stage, as it is for each local planning authority to decide on a response to the pervasive policies and determine the most suitable locations for the development – taking account, where necessary, of the finding of their own Habitats Regulations Assessment.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>This exercise identified a number of policies in the South East Regional Strategy which sought to avoid effects on European sites. These policies were generally included as mitigation for development that the Strategy itself encouraged. They were therefore considered further in order to determine whether it could be concluded that their revocation would not have adverse effects on such sites. Consideration was given, among other things, to the fact that: (i) the 'development policies' in the Regional Strategy they seek to mitigate would cease to apply were the Strategy to be revoked; and (ii) that the Conservation of Habitats and Species Regulations 2010 require that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive. This exercise did not identify any likely significant effects on European sites.</p> <p>For the Thames Basin Heath Special Protection Area (referred to in row 12, above) policy NRM6 was identified as a policy which sought to avoid effects on European sites. The further consideration referred to above noted that this is the second key policy which states that new</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England. Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. Where mitigation measures are required, local planning authorities, as Competent Authorities, should work in partnership to set out clearly and deliver a consistent approach to mitigation, based on a number of principles set out in the Thames Basin Heaths Delivery Framework and which should be incorporated into local authorities' Local Development Frameworks. The screening exercise concluded that revocation of this policy will not have an adverse effect on European sites.</p> <p>The policy sets out the principles for avoidance and mitigation measures, including the approach to Suitable Accessible Natural Greenspace, which are further detailed in the Thames Basin</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Heaths Special Protection Area Delivery Framework, endorsed by the Thames Basin Heath Joint Strategic Partnership Board. The policy requires the principles set out in the Thames Basin Heaths Special Protection Area Delivery Framework to be incorporated into local authorities' local development frameworks. The Thames Basin Special Protection Area Heaths Delivery Framework approach is intended to attract new residents away from the protected area and is funded by developer contributions or, alternatively, can be provided by developers for individual developments. Through providing or contributing to measures to ensure that they have no likely significant effect on the Special Protection Area, residential developments do not have to undergo an appropriate assessment in accordance with the requirements of the European Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations 2010. The policy provides one possible mechanism for protecting the European site, but revocation of the policy does not affect the legal or national planning policy requirement to protect the Special Protection Area. Policy NRM6 also states that where developers</p>



No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>propose a bespoke solution, this will be assessed on its own merits under the Habitats Regulations.</p> <p>The screening exercise also finds that revocation of Policy NRM5 (biodiversity) will not have an adverse effect on European sites as the housing allocation policies it seeks to mitigate will also be revoked, leaving it to local authorities to determine housing provision and location in their area. The statutory requirement for Local Planning Authorities to undertake Habitats Regulations Assessments of their plans and appropriate assessment of relevant projects will remain.</p> <p>This conclusion was supported by the findings of the Strategic Environmental Assessment. The Strategic Environmental Assessment assessed the likely effects of the revocation of the strategy, and the likely effects of retaining the strategy (and a number of reasonable alternatives involving partial revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which include biodiversity, fauna and flora). The assessment uses definitions of significance for each of the 10</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. The guidance on a significant effect for biodiversity includes reference to negative and sustained effects on European or national designated sites and/or protected species. No significant negative effects on biodiversity were found, nor were any significant negative effects found from reasonable alternatives. Monitoring measures have been proposed for the effects on biodiversity (as well as the other topics) to help review the effects of the decision.</p> <p>The Secretary of State is therefore proceeding on the basis that the implementation of the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the Thames Basin Heaths policy) will not have a significant effect on a European site.</p>
26.	<p><b>Individual Topics</b></p> <p><b>Local Enterprise Partnerships</b></p>	<p><b>Basingstoke and Deane Borough Council</b> welcomes the reference to the Enterprise M3 Local Enterprise Partnership in terms of its importance for setting the conditions for economic development in the sub-region and ensuring that local authorities will deliver the most sustainable and effective</p>	<p>Comments noted.</p> <p>The Government notes the statement by Basingstoke and Deane Borough Council about the importance of Enterprise M3 Local Enterprise Partnership for promoting in collaboration with neighbouring local authorities the economic</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>development for their area.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) stated that the Strategic Environmental Assessment highlights the role of Local Enterprise Partnerships in working with local planning authorities to provide cross-border economic activity and infrastructure delivery but note that these are inherently business-driven and are therefore unlikely to, and should not, play any significant role on strategic housing issues.</p> <p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) consider the Strategic Environmental Assessment rightly concludes there to be uncertainty with respect to the positive effects for Population/Human Health and economic factors in the short term. They note that Local Enterprise Partnerships, although established across the region, do not have a strategic planning function and therefore will not be involved in responding to the requirements of the National Planning Policy Framework paragraphs 178-181. Local Planning Authorities will have to comply with the legal test of the duty and there remains significant experience and best practice to be established before the duty to co-operate is</p>	<p>development of their borough and neighbouring authorities.</p> <p>The Government notes Savills' statement that Local Enterprise Partnerships are not 'strategic planning authorities' and should not play any significant role in strategic planning of housing. However, Local Enterprise Partnerships can contribute to the strategic planning process within the strategic planning context created by the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty to cooperate applies to local planning authorities, county councils and public bodies that are prescribed in Local Planning Regulations 2012. These bodies are:</p> <ul style="list-style-type: none"> <li>• the Environment Agency;</li> <li>• the Historic Buildings and Monuments Commission for England (English Heritage);</li> <li>• Natural England;</li> <li>• the Mayor of London;</li> <li>• the Civil Aviation Authority;</li> </ul>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		effectively and consistently implemented.	<ul style="list-style-type: none"> <li>• the Homes and Communities Agency;</li> <li>• Primary Care Trusts;</li> <li>• the Marine Management Organisation</li> <li>• the Office of Rail Regulation</li> <li>• the Highways Agency;</li> <li>• Transport for London;</li> <li>• Integrated Transport Authorities; and</li> <li>• Highway authorities</li> </ul> <p>The Localism Act also provides an enabling power requiring the bodies that are subject to the duty to have regard to the activities of other bodies when they are preparing their local plans and related activities. Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the duty to co-operate should be one of the priority areas on which the Government should</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and was published on 21 December for an 8 week consultation. The Government will consider the consultation responses before responding to the Group's recommendations.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, which would include Local Enterprise Partnerships which have a contribution to make to the strategic planning function along with bodies like utility and infrastructure providers.</p> <p>Example of activity by partnerships, including Local Enterprise partnerships, is already in evidence. The Gatwick Diamond business-led partnership is part of the wider Coast to Capital Local Enterprise Partnership and links are beginning to be made between the Gatwick Diamond partnership and the Local Enterprise Partnership. Their Water Cycle Study has enabled the authorities involved to establish a shared evidence base on the water environment that can inform emerging planning documents and in turn their decisions on location and timing</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>of strategic development allocations. The study has allowed phased delivery of development to take account of the need to provide new or upgraded infrastructure in line with water company planning processes. It has helped each council and its partners consider the collective and cumulative impacts of development at catchment scale. This was made possible through the cross-boundary approach adopted which has given each council an understanding of their neighbours' goals and those of the water companies and Environment Agency. The Partnership for Urban South Hampshire was originally established to support and promote economic-led growth in the South Hampshire area. It has in place a strong governance structure to manage a wide range of strategic planning and economic issues and has been responsible for a significant amount of joint evidence to support local plan-making. The spatial strategy is currently being updated to take account of a revised economic strategy and to manage a shortfall in housing provision.</p>
27.	<b>Individual Topics</b>	<b>Cherwell District Council</b> welcomes the confirmation that the Government is intending to retain Oxfordshire Saved Structure Plan Policy H2	<p>Comment noted.</p> <p>There are three extant saved structure plan</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>Saved Structure Plan on RAF Upper Heyford</b></p>	<p>(RAF Upper Heyford) until a revised local plan by Cherwell District Council is put in place. <b>Barton Willmore</b> (on behalf of Bovis Homes) believe it is important to retain this policy as an interim measure in order to give certainty to the developer and the community about the continuing policy position.</p>	<p>policies in the region.</p> <p>The Government notes the representations received from Cherwell District Council and Barton Willmore on behalf of Bovis Homes requesting that Saved Structure Plan Policy H2 (RAF Upper Heyford) should be saved until Cherwell District Council completes the preparation of their local plan.</p> <p>The Government is retaining policy H2 (Upper Heyford) of the Oxfordshire Structure Plan 2016. The saved Structure Plan policy regarding the development of land at RAF Upper Heyford intends to safeguard the site and its heritage value in the interim until the Proposed Submission draft Cherwell Local Plan (which includes reference to the conservation of the heritage interest of the site) is adopted. The consultation response received from Cherwell District Council welcomed the confirmation that the Government is intending to retain Policy H2, and a response from Barton Willmore (on behalf of Bovis Homes) considered it important to retain this policy as an interim measure in order to give certainty to the developer and the community about the continuing policy position.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>The Government is not retaining the other two extant saved structure plan policies in the region. These are set out in Appendix B to the updated Environmental Report as Oxfordshire Structure Plan 2016 Policy T7 (Service Areas) where applicable national policy is in place and Oxfordshire Structure Plan 2016 Policy M2 (Sand &amp; Gravel) where the policy is identified as being generic in nature. The National Planning Policy Framework also sets out policy on sand and gravel.</p> <p>No consultation were received on the proposal to revoke saved structure plan policies T7 and M2. .</p>
28.	<p><b>Individual Topics</b></p> <p><b>Infrastructure provision</b></p>	<p><b>Dorset County Council</b> states the assessment does not acknowledge the difficulties of providing infrastructure in the current economic circumstances, or how the government is encouraging local authorities to reassess viability and renegotiate S106 agreements and affordable housing targets. Although this will enable some housing or economic development to take place it may be at the loss of important infrastructure which in the longer term may disadvantage local communities.</p>	<p>Comments noted.</p> <p>The updated Environmental Report places the plan to revoke Regional Strategies within the context localism and other incentives such as the New Homes Bonus, to encourage local authorities and communities to realise their aspirations for housing and economic growth. The deviation of housing completions from those planned in the South East Regional Strategy is noted.</p> <p>The Government has introduced broader policy</p>



No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>measures outside of the Plan to Revoke, for example, the New Homes Bonus is designed to ensure that communities which are growing can mitigate the strain of increased housing and respond to community ambitions, for example by providing local services, unlocking infrastructure and community facilities. The provisional allocations for all England local authorities were published in December 2012. The New Homes Bonus complements broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>The duty to co-operate reflects the Government's broader approach to locally-driven cooperation to address the challenges of growth, including the strategic role played by Local Enterprise Partnerships. The Government updated its National Infrastructure Plan in 2012, which includes a section on financing and funding planned investment.</p> <p>The Community Infrastructure Levy provides a transparent way of helping to fund essential local infrastructure and the Government expect it to be providing around £1 billion worth of funding for</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			infrastructure by 2016. The Levy is set locally, based on local evidence and viability, and is subject to public consultation and independent examination before adoption.
29.	<b>Individual Topics</b> <b>Minerals and Waste planning</b>	<b>Oxfordshire County Council</b> states for minerals and waste the County Council considers the revocation of the South East Regional Strategy is beneficial as the submitted minerals and waste plan has a lower target for aggregate production and a more ambitious target for the diversion of waste from landfill. The South East Aggregates Working Party and the South East Waste Planning Advisory Group are helping the County Council to fulfill the duty to co-operate in absence of more formal structures in the South East Plan.	Comments noted.
30.	<b>Individual Topics</b> <b>Green Belt</b>	<b>South Oxfordshire District Council</b> states the council supports the findings of the Strategic Environmental Assessment that suggests the revocation of the South East Plan would lead to lessening of pressure on the Oxford Green Belt to the south of the city. In fact, the revocation of the South East Plan would lesson pressure on all of the Oxford Green Belt, not just to the south.  <b>Campaign for the Protection of Rural England</b>	Comments noted.  The Government notes South Oxfordshire District Council's observation that the revocation of the South East Regional Strategy will lesson development pressure on the Oxford Green Belt and across the region.  The Government notes the observations made by the Campaign for the Protection of Rural England Hampshire about the broader role Green Belt

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Hampshire</b> state that Green Belt has a wider function (which may include retaining urban spread, as well as promoting regeneration and new growth) which can only be fully appreciated in a wider context than can be provided solely through a locally-based decision making process.</p>	<p>plays beyond preventing urban sprawl. The National Planning Policy Framework at paragraph 80 illustrates the five purposes that Green Belt serves and local planning authorities working collaboratively through the duty to cooperate can take a strategic approach to the setting of Green Belt boundaries and the subsequent management of the Green Belt across administrative boundaries at greater than local geographical scale, if they wish to.</p>
31.	<p><b>Individual Topics</b></p> <p><b>Legal challenge to the Green Belt review south of Oxford</b></p>	<p><b>South Oxfordshire District Council</b> states at page 22 of the updated Environmental Report reference is made to the successful legal challenge to the Green Belt south of Oxford. It states that the precise form of relief has yet to be agreed. It would be helpful to explain what the issues are to be resolved as this is of particular importance in the consideration of a partial revocation of the South East Plan and which parts of the plan are revoked. The outcome of the challenge has remained unresolved.</p>	<p>Comments noted.</p> <p>As set out in the updated Environmental Report, there were four legal challenges to the South East Regional Strategy policy for a selective review of the Green Belt to the south of Oxford, including one from South Oxfordshire District Council. The challenges were conceded on the basis that the Sustainability Appraisal failed to take into account reasonable alternatives. Two of the challenges were subsequently withdrawn. In respect of the precise form of relief in the two remaining challenges, the parties have agreed to await the outcome of the Minister's decision whether to retain, revoke or partially revoke the South East Regional Strategy following</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			consultation.
32.	<b>Individual Topics</b> <b>Growth &amp; Infrastructure Bill</b>	<p><b>Savills and DAC Beachcroft</b> (on behalf of Barratt, David Wilson, Crest Nicholson and Wates) notes that the recent Government announcements in respect of the Growth and Infrastructure Bill have not been factored into the Strategic Environmental Assessment. This is appropriate given the stage and status of this Bill, which contains proposals designed to unlock the delivery of stalled major residential schemes.</p>	<p>The Government welcomes Savills response and agrees that it contains such measures, although notes that it has not yet received Royal Assent.</p>
33.	<b>Individual Topics</b> <b>Evidence from Core Strategy Examinations</b>	<p><b>Savills and DAC Beachcroft (on behalf of Barratt, David Wilson, Crest Nicholson and Wates)</b> illustrate a number of decisions taken by Inspector's on recently produced Core Strategies in support of their proposal to retain the South East Regional Strategy:</p> <ul style="list-style-type: none"> <li>• In examining the Woking Core Strategy the Inspector concluded that the existence of the South East Plan assisted in demonstrating a sound approach to the proposed housing, spatial strategy and need for Green Belt review.</li> <li>• In examining Wealdon Core Strategy the</li> </ul>	<p>Comment noted.</p> <p>The Government notes the information provided by Savills illustrating the comments made by Inspectors about the role of the South East Plan as a point of reference to test the soundness of the three Core Strategies cited. The Government considers that Paragraphs 150 to 157 of the National Planning Policy Framework provide a robust policy context to test the soundness of Core Strategies and local plans, together with more detailed requirements in the rest of the Framework. In particular, paragraphs 158-159 set out the proportionate evidence base regarding housing and Chapter 9 provides the policy basis</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>existence of the South East Plan played an important 'check' on testing the Core Strategy, which was found sound.</p> <ul style="list-style-type: none"> <li>The Inspector of the East Hampshire Core Strategy has provided preliminary conclusions which have resulted in the suspension of the Examination. Savills' suggest that this provides further exemplification of the continued role of the South East Plan as part of a workable transition and in providing a benchmark for plan making (minima housing), alongside the pressing need for up to date evidence.</li> </ul>	for protecting Green Belt.

# Annex C

## Monitoring Indicators

**Table C1 Strategic Environmental Assessment topics, monitoring indicators and sources of information**

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
<b>Biodiversity, Flora and Fauna</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Condition of designated sites</li> <li>• Threatened habitats and species</li> <li>• Populations of countryside birds</li> <li>• Surface water biological indicators</li> </ul>	<p>Joint Nature Conservation Committee report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p>Joint Nature Conservation Committee  <a href="http://www.jncc.gov.uk/page-4241">http://www.jncc.gov.uk/page-4241</a>  <a href="http://jncc.defra.gov.uk/page-4239">http://jncc.defra.gov.uk/page-4239</a>  <a href="http://jncc.defra.gov.uk/page-4238">http://jncc.defra.gov.uk/page-4238</a>  <a href="http://jncc.defra.gov.uk/page-4235">http://jncc.defra.gov.uk/page-4235</a>  <a href="http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF">http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</a></p> <p>Department for Environment, Food and Rural Affairs (Defra)  <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a></p> <p>The Environment Agency (EA) are responsible for monitoring water quality under the Water Framework Directive</p>
<b>Population</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Employment Information</li> </ul>	<p>Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> <li>• Population</li> <li>• Housing and additional net dwellings</li> <li>• Local plan making progress and the duty to co-operate</li> </ul>	<p>Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region</p> <p>The Department for Communities and Local Government Business Plan monitoring</p>
<b>Human Health</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• National Statistics – Long term illness, etc.</li> <li>• Crime</li> <li>• Deprivation</li> <li>• Access to and quality of the local environment</li> </ul>	<p>Office for National Statistics on health</p> <p>Home Office, Crime Survey for England and Wales</p> <p>Department for Communities and Local Government statistics: Indices of Deprivation</p> <p>Office for National Statistics (proposed measures of wellbeing)</p>
<b>Soil and Geology</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Land use</li> </ul>	<p>Department for Communities and Local Government statistics</p>
<b>Water</b>	<p>Annual (where information</p>	

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<p>allows) trends in:</p> <ul style="list-style-type: none"> <li>• % of catchments with good ecological status</li> <li>• Water resource availability</li> <li>• Per capita water consumption</li> <li>• Number of water resource zones in deficit</li> </ul>	<p>The Environment Agency and the Department for Environment, Food and Rural Affairs.</p> <p><a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a></p> <p>Southern Water, Thames Water, South East Water, Portsmouth Water, Veolia Water South East, Sutton and East Surrey Water</p> <p>Southern Water, Thames Water, South East Water, Portsmouth Water, Veolia Water South East, Sutton and East Surrey Water</p> <p>Water Resource Plans (available every 5 years) from Southern Water, Thames Water, South East Water, Portsmouth Water, Veolia Water South East, Sutton and East Surrey Water</p>
<b>Air</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Number of Air Quality Management Areas</li> <li>• Number of Air Quality Management Areas were exceedances occurred.</li> </ul>	<p>Department for Environment, Food and Rural Affairs</p> <p>Department for Environment, Food and Rural Affairs</p>
<b>Climatic factors</b>	Annual (where information	



Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<p>allows) trends in:</p> <ul style="list-style-type: none"> <li>• Emission of greenhouse gases</li> <li>• Installed capacity of sites generating electricity from renewable sources (MW)</li> <li>• Number of properties at risk of flooding</li> </ul>	<p>Department for Energy and Climate Change Statistical Release: Local and regional CO2 emissions</p> <p>Department for Energy and Climate Change Regional Renewable Statistics (from the RSTATS (Renewable Energy Statistics) database and REPD (the Renewable Energy Planning) database, <a href="https://restats.decc.gov.uk/cms/welcome-to-the-restats-web-site/">https://restats.decc.gov.uk/cms/welcome-to-the-restats-web-site/</a>)</p> <p>Environment Agency</p>
<p><b>Material Assets</b></p>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Volume of construction waste and proportions recycled</li> <li>• Volume of hazardous waste</li> <li>• Volume of controlled wastes and proportions recycled</li> <li>• Volume of minerals</li> </ul>	<p>Environment Agency</p> <p>Environment Agency</p> <p>Environment Agency</p> <p>South East Mineral Planning Authorities'</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	extracted	
<b>Cultural heritage, including architectural and archaeological heritage</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• % of heritage assets of different types that are at risk</li> </ul>	English Heritage 'Heritage at risk report'
<b>Landscape and Townscape</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Change in Areas of Outstanding Natural Beauty (area, threats and quality)</li> <li>• Changes in Conservation Areas</li> <li>• Percentage who are very or fairly satisfied with local area</li> <li>• Trend in number of vacant dwellings</li> </ul>	National Association of Areas of Outstanding Natural Beauty  English Heritage (if 2003 survey repeated)  Office for National Statistics (proposed measures of wellbeing)  Department for Communities and Local Government <a href="http://www.communities.gov.uk/documents/housing/xls/1815794.xls">http://www.communities.gov.uk/documents/housing/xls/1815794.xls</a>