

SOUTH EAST INTEGRATED REGIONAL FRAMEWORK: REPORT ON CONSULTATION RESPONSES TO DRAFT DOCUMENT AND HOW THEY HAVE BEEN ADDRESSED IN THE FINAL VERSION

Purpose of this report

A draft Integrated Regional Framework (IRF)¹ was produced for consultation and circulated to relevant stakeholders. The draft was discussed at the consultation event on the 26 January 2004. Stakeholders were also given the opportunity to submit written comments up until the end of February. This document summarises the comments received and describes how they have been addressed in the final document.

Comments on specific parts of the document are listed and addressed in the table below. In addition, strategic issues about the development and use of the document are also summarised in the following paragraph.

Development and use of the document

- The Regional Assembly will produce a draft Communication Strategy for the IRF. Among other things, the Communications Strategy will consider how to work with regional, community and local authority stakeholders to deliver the IRF. It will also look at how partners can 'sign up' to using the IRF.
- Monitoring of data is being carried out by the Assembly as part of its monitoring reports. Further summaries highlighting the major issues may also be needed, and this will also be considered in the Communications Strategy
- The working group will produce a good practice guide on sustainability appraisal at a later stage.
- The full document will be reviewed within three years.

¹ Referred to as Integrated Regional Strategy (IRS) at the time

Table 1: Consultation responses to draft IRF document (from group comments at consultation event and from individual written comments)

General comments	Issues arising/more details	How comments have been addressed or will be addressed by the working group
<ul style="list-style-type: none"> • How will the document be delivered? • Needs an action plan • Partners should be asked to sign up to the document 	<ul style="list-style-type: none"> • There were different views on the form an Action Plan should take, and whether it is necessary. • Achieving 'buy-in' from a wide range of partners is important. One comment noted that until now, only a small range of partners have been involved. 	<ul style="list-style-type: none"> • The Regional Assembly is producing a Communication Strategy. This will address implementation and the suggestion of partners being asked to 'sign up' to the document.
<p>Importance of monitoring and review</p>	<ul style="list-style-type: none"> • Links to treatment of indicators (see Data and Trends report below) • One response said should be clearly separated from RPG monitoring. • One group suggested monitoring and performance measurement should go in a separate section. • One group stressed the importance of monitoring against targets. 	<ul style="list-style-type: none"> • Information on data and trends (ie monitoring against indicators and targets) has been moved into a separate document within the IRF. • Monitoring of data is being carried out by the Assembly as part of its monitoring reports. Further summaries highlighting the major issues may also be needed as part of the Communications Strategy. • The full document will be reviewed within three years.
<ul style="list-style-type: none"> • Too long, not user friendly • Need to identify audience / market for different audiences 	<ul style="list-style-type: none"> • Specific sections below address options for reorganising document. • Several comments suggested an executive summary, or a summary for particular audiences: local communities, local authorities. 	<p>(Individual comments on restructuring document are also addressed under relevant sections below).</p> <ul style="list-style-type: none"> • An executive summary has been produced.
<p>Does not address local level</p>	<ul style="list-style-type: none"> • The main concerns are how local authorities, LSPs and community groups should relate to the document. 	<ul style="list-style-type: none"> • This will always be a tension with a regional document. The Communications Strategy will consider how to work with community and local authority stakeholders to deliver the IRF at a local level but a set of locally focussed documents was considered inappropriate as

General comments	Issues arising/more details	How comments have been addressed or will be addressed by the working group
		part of the IRF.
Not specific to South East	<ul style="list-style-type: none"> See comments on objectives below 	<ul style="list-style-type: none"> The vision has been made more South East focussed. It is considered that the objectives do address issues specific to the South East.
Does not provide a clear account of the purpose and content of the document		<ul style="list-style-type: none"> See below
Needs to make purpose of IRF clearer	<ul style="list-style-type: none"> Main concern was that integration role should be spelled out more. Links with suggestions for including the Guide to Appraisal (part 4 in the draft) in the introduction. (which would also address issues of duplication between parts 1 and 4) 	<ul style="list-style-type: none"> The integration role has been spelled out more clearly in the introduction. The former part 4 (Guide to Appraisal) has been included in the introduction.
Other specific comments	<ul style="list-style-type: none"> Specific textual comments One comment said there should be more background info on SD, another said there is too much already. 	<ul style="list-style-type: none"> Specific comments have been addressed in published version as far as possible.
Comments on compendium of strategies		
Not useful in its current form: just a list of strategies that doesn't address integration issues	<ul style="list-style-type: none"> Specific suggestions were that it should illustrate links between strategies (ideally in visual form). See other comments below 	<ul style="list-style-type: none"> The new table at the beginning of the Compendium shows how strategies can contribute to the IRF objectives. The independent review of strategies also now comment on integration issues, and makes recommendations on improving integration.
<ul style="list-style-type: none"> Too long Should be moved to appendix 		<ul style="list-style-type: none"> Has been made a separate document, with a summary in the introduction

General comments	Issues arising/more details	How comments have been addressed or will be addressed by the working group
<ul style="list-style-type: none"> • Presentation needs to be improved with visuals • Need to show how strategies link to each other 	<p>Specific suggestions were that a diagram should show the hierarchy of strategies and overlaps</p>	<ul style="list-style-type: none"> • A simple diagram showing the key strategies has been included in the IRF (though it is very difficult to demonstrate relationships between strategies simply). • Section 2 of the main IRF shows relevant strategies that link to each objective under the heading “Key links with regional strategies and plans”.
<ul style="list-style-type: none"> • Should address conflicts and gaps • Should identify key themes from strategies 	<ul style="list-style-type: none"> • Lack of regional health strategy was mentioned as an issue by one group • One written response suggested that this section should be centred round a discursive piece on key themes, and conflicts. 	<ul style="list-style-type: none"> • The independent review of strategies identifies some key themes.
<p>Should provide more information on other agencies and strategies/frameworks/statements</p>	<p>Specific comments referred to:</p> <ul style="list-style-type: none"> • Strategies which have been left out of list (eg countryside, cultural) • Inconsistent treatment of agency roles (why only EA mentioned?) • Need to clarify whether ‘strategies’ are a strategy, framework or statement • Need for information on review date, contact details, whether SA has been done, weblinks to strategy • Should include a list of partners involved in each strategy 	<ul style="list-style-type: none"> • Compendium is intended to cover the main regional strategies for each sector, and therefore does not include strategies with a narrower ambit. • For some sectors, where there is no main strategic document, the role of the key agencies responsible for strategic policy is described instead. In the case of the environment, the published document refers to the role of the Countryside Agency, English Nature and English Heritage, as well as the Environment Agency. • It is not considered appropriate to include all additional information partly because of other comments on the document size.
<p>Matrix is helpful but needs to show more links</p>		<ul style="list-style-type: none"> • Additional links have been included in matrix as suggested.

General comments	Issues arising/more details	How comments have been addressed or will be addressed by the working group
Comments on Objectives section (Section 2 of the main IRF in the final document)		
There was broad agreement with objectives		
<ul style="list-style-type: none"> • Prioritise objectives to address conflicts • Make the decision making process (including how conflicts are addressed) transparent • Improve text on synergies and conflicts 		<ul style="list-style-type: none"> • Rather than prioritise objectives, the document recommends that the sustainability appraisal framework be used to identify conflicts between objectives. • The treatment on synergies and conflicts has been improved where possible.
<ul style="list-style-type: none"> • Specific comments on objectives 	<ul style="list-style-type: none"> • See table 2 below on specific objectives 	
Comments on Data and Trends report		
Indicators and targets are essential as part of monitoring and review process	<p>Comments on monitoring already referred to in 'general' section above. Specific additional comments suggested that:</p> <ul style="list-style-type: none"> • National or statutory indicators should be highlighted (this is partly addressed by the information currently in table 1) • There should be a separate list showing targets • There should be a list of "indicators under development" • Indicators should link with indicators 	<ul style="list-style-type: none"> • The table at the beginning of the data and trends report shows indicators, targets and links to other indicator sets (including national headline indicators). • The degree to which the regional strategies include IRF indicators has been considered in the independent review of strategies. • The final document includes a number of indicators which are still under development.

General comments	Issues arising/more details	How comments have been addressed or will be addressed by the working group
	used in regional strategies	
<ul style="list-style-type: none"> Do indicators measure what we want to achieve? Suggestions for additional indicators. 	A range of suggestions were made on changed or additional indicators	Discussions were held with individual regional stakeholders, in response to specific suggestions, and some additional indicators have been included in the published document. These include indicators on sustainable drainage (2b), rural poverty (4e), rural access to services (8a), ancient woodlands (13d), buildings meeting BREEAM standards (16a and 16b) and ecological footprint (16c).
There is a need for sub-regional/local indicators	The idea is that local indicators would help local authorities and LSPs link their targets to regional targets	The Working Group did not consider that this was appropriate in the IRF.
Comments on Guide to Appraisal		
<ul style="list-style-type: none"> This is useful and an important part of the document Needs to be included in part I 		The guide to appraisal has now been included in Part I of the IRF.
Needs improvement in presentation and content	Suggestions for improvement include: <ul style="list-style-type: none"> Reduce amount of jargon Include worked examples Include flowchart Give guidance on addressing conflicts Clarify whether this is full or outline guidance Integrate other methodologies (SEA, HIA, rural proofing) Consider providing training 	<ul style="list-style-type: none"> The suggestions for improving presentation have been taken on board as much as possible. Guidance is provided at appropriate level for a regional document. Unfortunately the Working Group does not have resources to provide training.

Table 2: Comments on Specific Objectives

Objective (numbers refer to objective numbers in the final document)	Comment details	How comment has been addressed by the Working Group
New	<ul style="list-style-type: none"> Objective on Adaption to climate change Target on water company drought/supply plans 	<ul style="list-style-type: none"> Adaption has been included in climate change objective (12) Indicator on drought plans has been included as indicator 12b in the final document.
New	<p>“Measure trends in sustainable consumption and production that take into account the global dimensions of sustainability” Economic footprint suggested as indicator</p>	<ul style="list-style-type: none"> Additional objective on global resource use(16) has been added in the final document Eco footprint has been added as indicator 16c.
New	<p>“To promote the use of recycled aggregates eg construction and demolition waste”</p>	<p>This objective is too narrow to be separate. It is considered that objective 17 (waste) already covers it.</p>
New	<p>New objectives for noise and other pollution, maintaining and enhancing the built environment, and increasing peoples’ understanding of the natural environment, meeting local needs locally, and promoting local employment</p>	<p>It is considered that these issues are dealt with by existing objectives, and the other changes described here.</p>
Objective 1 (Housing)	<p>Amend to read: “To plan to meet the housing requirements of the whole community, including those in need of affordable or special needs housing”</p>	<p>The Working Group considered existing wording adequately covered the issue.</p>
Objective 1 (Housing)	<p>Make link to energy efficiency</p>	<p>The wording has been changed to read “sustainably constructed”</p>
Objective 2 (Flooding)	<p>Wording is inelegant on this objective</p>	<p>The wording has been changed to read “To reduce the risk of flooding and the resulting detriment.....”</p>
Objective 24 (Tourism)	<p>Should be in economic section</p>	<p>Has been moved as suggested.</p>

Objective (numbers refer to objective numbers in the final document)	Comment details	How comment has been addressed by the Working Group
Objective 10 (Land and buildings)	Modify to “To improve efficiency in land use through the re-use of previously developed land.....and encourage sustainable construction and urban renaissance”	Sustainable construction covers a wider range of sustainability issues than land and building reuse, so does not sit very well within this objective. It has instead been included within a new objective (16) on resource use.
	Delete “including reuse of material from buildings from objective 11 (which does not cover all reuse of construction and demolition waste).	No change - it is considered that reuse of material from buildings is appropriate in this objective.
	“ensure that the built environment: eg buildings and roads are designed for long life spans and change of use”	This issue is addressed by the new objective on resource use.
Objective 14 (countryside and historic environment)	Either have separate objectives for access, landscape and historic environment, or include wildlife in objective 15. Disagree with combination of countryside and historic environment in one objective.	The Working Group did not agree with this suggestion.
Objective 21 (economic growth)	Modify to: “To sustain economic growth and competitiveness in a manner which uses the minimal amount of natural resources, and contributes to the social and economic needs of the region ” Suggests that each objective should be made accountable to other relevant strands in a similar way.	This conflates two distinct objectives which the working group felt are better dealt with individually but within an overall integrated framework.