

Annex B Audit Trail Sustainability Appraisal of the Draft South East Implementation Plan September 2006

This statement shows how sustainability considerations have been integrated into the revised South East Plan Implementation Plan. The findings and recommendations of the Initial Sustainability Appraisal, of the Implementation Plan that was submitted to Secretary of State March 2006, were used by Assembly's staff to inform the development of the Revised Implementation Plan. This audit trail sets out how the SA recommendations have been addressed in the revised Implementation Plan (as endorsed by the Executive Committee on Friday 20 October and been submitted as evidence for the Examination in Public).

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6	Infrastructure Concordat	From the perspective of the SA it would be useful if there was also a 'Policy Concordat' setting out the changes and timescales for change for policies to assist the behavioural and other changes necessary to implement the Plan in a sustainable way.	No	<p>The process of influencing National Government will be conducted through making representations towards individual ministerial decisions. As such the process of 'influencing government' will be iterative.</p> <p>It is considered that the plan is proactive in its support for introducing behavioral change measures. As pointed out in the SA statement, this will require changes, often through legislation, at a national level.</p>
7	Pre-conditions for Effective Implementation	The recent House of Lords report on the water sector sets out a series of recommendations on the water sector to improve strategic policymaking and investment the Implementation Plan should consider their recommendations. These should also be reflected in the region's work on this topic where relevant.	Yes	Specific actions have been incorporated into the Planning Implementation Framework. In particular the role of Water Resource Plans.

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8	Behavioural change	Whilst toolkits, as advocated in the Plan, may be of some assistance in achieving behavioural change there is no substitute for substantial policy change and associated incentives and charges. Guidance alone is very unlikely to achieve the scale or the rate of change required.	Yes	The revised Implementation Plan clearly sets out an approach and a number of actions intended to achieve behavioural change, though the effectiveness will be dependent upon legislative change.
8	Regulatory Frameworks	The SA raises concerns over the need for greater emphasis on resource efficiency and the management of the region's ecological footprint. Improved strategic planning and attention to issues for resource efficiency are key to achieving positive outcomes for the region on these issues.	Yes	The revised Implementation Plan clearly sets out a number of actions, including potential regulatory change, intended to reduce the regions ecological footprint, though the effectiveness will be dependent upon behavioral and / or legislative change.
8	Managing the Existing Infrastructure Asset	The performance/resource efficiency of the region's existing housing stock must be a focus for the Plan if the region is to reduce its ecological footprint. The need to achieve improvements to existing infrastructure in terms of performance and condition is basic to the analysis of the SA.	Yes	The revised Implementation Plan clearly sets out a number of actions to achieve greater resource efficiency, intended to reduce the regions ecological footprint.

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11	Policy Implementation Framework overall: Behavioural change	The Policy Framework stresses the importance of behavioural change but this does not carry over into the proposed actions where the need to change behaviour and manage demand is largely missing. This will need to be addressed if commitments regarding the region's ecological footprint are to be realised. In some cases the current lack of proposed actions on demand management and resource efficiency raise questions over the feasibility of the policy approach taken in the Draft Plan, the 'twin-track' approach to water management is the most obvious of these.	Yes	The revised Implementation Plan clearly sets out an approach and within the Policy Implementation Framework (Annex I) a number of specific actions (including in relation to water management) intended to achieve behavioural change, though the effectiveness will be dependent upon legislative change.
11	Policy Implementation Framework overall: Addressing the Needs of the Plan	In its current draft the framework series to consist of agencies carrying out 'business as usual' activities whether these relate to the 'direction of travel' of the Plan or not. This seems unlikely to bring about the level of change in thinking and funding priorities needed to deliver the Plan. It is also not clear how the 'support' role of some agencies for some actions has been arrived at. There are also a number of actions that require significant change from both regulations and regulated industries.	Yes	The policy implementation framework has been updated to incorporate 'challenging' behavioural actions. The Assembly has commissioned expert advice on practical steps for engaging with the regulated industries to influence the regulatory frameworks.

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II	Policy Implementation Framework overall: Linking Policy and Actions	It is not clear from the current Policy Implementation Framework how the 'cross-cutting' policies in the Plan will be carried forward. In the case of climate change there is a separate strategy but how this relates to the framework is far from clear. The SA raised the issue of the need to demonstrate how the cross-cutting policies will be taken forward by the Plan and the Assembly has begun work on this issue. This appraisal underlines the need for that analysis.	Yes	The Assembly has conducted this analysis. It is presented in Annex C
II	Policy Implementation Framework overall: Performance	The Monitoring Framework for the Plan is a separate document and at present there is little within the Policy Framework that relates to performance. Consideration should be given to including clear performance criteria within the Policy Framework. In addition the framework and the Plan as a whole needs to provide more information on timing and on the risks attached to non –achievement of policy and issues in terms of the delivery of the Plan and its overall sustainability.	Yes	Will need to be addressed through refinement of monitoring framework in due course. Detailed timing and programming needs to be addressed by delivery agencies through ongoing dialogue
AI	Policy Implementation Framework detailed: Objective 1 Affordable Housing	These proposals are clearly in line with the recommendations of the SA. It needs further development in terms of the deliverability/timing of these actions and an analysis of the impacts on the Plan of non or delayed delivery of these actions which are quite significant commitments for Government.	No	Detailed timing and programming needs to be addressed by delivery agencies through ongoing dialogue

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A2	Policy Implementation Framework detailed: Objective 2 Flooding	It would be useful if critical areas for Agency assistance were outlined, the role of Strategic Flood Risk Assessments explained and critical timelines set out. In general, a higher level of spatial definition of this issue would help as would the identification of any critical schemes.	Yes	Annex I of the Implementation Plan sets out the need for the Environment Agency to prepare Flood Management Plans that consider climate change adaptation and influence spatial plans.
A2	Policy Implementation Framework detailed: Objective 3 Health	Section D2 of the Policy Framework does not describe how Policy RE5 will be taken forward in detail although it is clear that SEEDA will have a key role in this via the RES. More detail on how this policy will be addressed would be useful including a reference to the implementation of key issues arising from sub-regional strategies.	Yes– further action to be taken	Further work will be undertaken in partnership with SEEDA to ensure that the RES implementation Plan complements South East Plan spatial objectives
A2	Policy Implementation Framework detailed: Objective 4 Social Exclusion	It is not clear how policy S1 on Social Inclusion will be taken forward.	Yes	Section D11 of the Policy Framework identifies the RES as a key delivery vehicle for actions to reduce social and economic exclusion.
A4	Policy Implementation Framework detailed: Objective 11 Air Quality	The only coverage of air quality in the Draft Implementation Plan is in terms of the need for local authorities to ensure that proposals in LDGs are consistent with the need to improve air quality. This misses out the broader issues of transport emissions, the pollution generated by congestion etc which are more significant at regional level. This issue will need to be reconsidered as the Implementation Plan develops so that the strategic, regional level issues associated with air quality and emissions are captured	No	The issue of air quality and transport emissions is clearly set out in the implementation plan and the South East Plan.

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A5	Policy Implementation Framework detailed: Objective 13 Biodiversity	This is fine as far as it goes but it will need to be developed to address how habitat enhancement, the implications of Appropriate Assessment, Green Infrastructure and other issues will be dealt with in a strategic way as an integral part of delivering the plan.	Yes – further action to be taken	<p>Awaiting further evidence from on-going EA study in relation to green infrastructure.</p> <p>The findings of the Appropriate Assessment will need to be taken on-board through the EiP process.</p>

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A5	Policy Implementation Framework detailed: Objective 14 Countryside and Historic Environment	<p>Section D7 of the Policy Implementation Framework addresses 'Countryside and Landscape Management'. This lacks an overall approach to ensuring the effective management of the countryside and the region's landscape. The role of Natural England is seen as a supporting/education role – we would recommend that this is reviewed.</p> <p>The roles of some stakeholders, in particular the private sector are very poorly expressed. The roles of AONB Management Boards/JACs etc are simply a reiteration of their mandates/functions and are not specific to the Plan.</p> <p>The reference to the role of Defra appears to be incorrect insofar as it states that Defra should 'Shape future policy within the framework of CAP to reflect the aims of the policies in the Plan'. This doesn't seem to reflect the way that policy in relation to the CAP actually develops, the role of the regional chapters of the RDP etc.</p> <p>The same concerns also exist with regard to what is said about the historic environment where the existing role of English Heritage in terms of providing grants for conservation and regeneration of the historic environment.</p>	<p>Not changed</p> <p>Not changed</p> <p>Not changed</p> <p>Not changed</p>	<p>Annex I sets out a comprehensive framework for implementing the South East Plan's objectives for the countryside and historic environment. It is acknowledged that some points may need to be strengthened, however it is not clear what additional actions or resources are required. Further work may be needed in light of the panel report.</p>

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A6	Policy Implementation Framework detailed: Objective 15 Road Congestion and Pollution	The remaining unknown is the deliverability of all of this. This will need to be more clearly set out in the Implementation Plan as it develops as will the potential impacts on the Plan on non delivery or delayed delivery of key schemes. This type of sensitivity analysis will clarify the extent of the 'implementation challenge'.	Yes– further action to be taken	<p>The Implementation Plan sets out a clear and comprehensive framework for efficient management of transport in the region. Annex 3 sets out the transport priorities in the region for the whole of the plan period, while the policy implementation framework (Annex 1) clearly identifies the key agencies involved in delivery.</p> <p>However, it is recognised that the policy implementation framework does not specifically relate to the freight and logistics industry. Section D4 of the implementation framework may need to be strengthened to reflect this matter depending on the outcome of the EiP.</p>
A7	Policy Implementation Framework detailed: Objective 16 consumption of resources	The overall issue of the impacts of resource consumption and production is not clearly identified as a delivery issue.	No	The South East Plan identifies sustainable construction and the sustainable use of resources as a core policy objective. As such, the 'overall issue' of resource consumption and production is clearly identified as an issue to be addressed, and therefore becomes a key consideration for delivery.

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A7	Policy Implementation Framework detailed: Objective 17 Waste	<p>The current draft of the Implementation Plan is actually quite vague as to what delivery would actually entail. So far National Government the key role is to deliver incentives and regulations of the waste industry - specifically it should 'Keep incentives and regulation under review in support of delivering improved waste management'. This is too vague to be of much support to the issues raised by the SA, especially the challenge of reducing waste arisings via demand management, behavioural change etc.</p> <p>Similarly, another key delivery partner, the Waste Disposal Authorities, are tasked to (a) 'Ensure that Waste Management Strategies and recycling plans are consistent with the South East Plan' and (b) 'Ensure that contracts for waste disposal are consistent with the delivery of the longer-term objectives and targets of waste management in South East Plan (sic)'.</p> <p>This does not, at present, look like a plan that will deliver reduced waste arisings and resource efficiency at levels likely to help the region meet its objective of stabilising its ecological footprint'.</p> <p>The delivery actions of the Waste Collection Authorities and the Waste Management Industry are more broadly in line with the issues identified by the SA but again suffer from being extremely generic.</p>	No	<p>The SA overemphasises the scope for waste minimization through the spatial planning process.</p> <p>Reduction of waste arisings depends on many factors outside the control or influence of the RSS. Different approaches will be needed for different types of waste – construction, commercial & industrial, municipal and wastes classed as hazardous.</p> <p>RSS may be able to influence construction, demolition and excavation waste particularly through the promotion of sustainable construction techniques and use of Supplementary Planning Documents by local planning authorities.</p> <p>Commercial & Industrial and hazardous waste may be reduced through regulation and price signals (making disposal more expensive).</p> <p>Municipal Solid Waste is most difficult to address as it is the end of the supply chain.</p>

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A8	Policy Implementation Framework detailed: Objective 18 Water Quality	<p>There is very little indeed of the 'twin track' approach to water resources that is the declared intent of the Draft Pan. This and a complete absence of actions associated with demand management and behavioural change/resource efficiency highlights the extent of the thinking that still needs to be done with regards to implementing this component of the Policy Framework.</p> <p>The reference to the Building Regulations needs to be far less generic in terms of what needs to be done.</p>	Yes	<p>The revised Implementation Plan clearly sets out an approach and a number of actions intended to achieve behavioural change, though the effectiveness will be dependent upon legislative change.</p> <p>Specific actions on water management have been incorporated into the Policy Implementation Framework, supporting the 'twin-track' approach.</p> <p>It is unclear how the plan could be more specific on changes to building regulations; such changes would be predominantly technical issues that are beyond the scope of spatial planning. As such it would be inappropriate for the plan to state specific changes.</p>

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A8	Policy Implementation Framework detailed: Objective 19 Energy	<p>In the case of National Government – the role is framed in a very generic way in terms of revising the building regulations. The Plan needs to be much clearer on what needs to be revised and to what level.</p> <p>Again this is all quite vague – it does not address issues of performance, demand management, behavioural change etc.</p> <p>The role of the energy industry is also quite vague and generic.</p>	No	<p>It is unclear how the plan could be more specific on changes to building regulations; such changes would be predominantly technical issues that are beyond the scope of spatial planning. As such it would be inappropriate for the plan to state specific changes.</p> <p>It is considered that the plan is proactive in its support for introducing behavioral change measures. As pointed out in the SA statement, this will require changes, often through legislation, at a national level.</p> <p>It is therefore considered that the plan promotes behavioral change to the greatest capacity possible within the scope of a Regional Spatial Strategy.</p> <p>It is considered that Annex I clearly identifies the role of the energy industry in implementing the plans objectives.</p>
12	Appraisal of the Regional Scale Infrastructure Framework: Overall	It would be useful to know how the projected level of investment required compares with a contribution of 'business as usual' level funding and other possible scenarios. This information would help to highlight the scale of additional investment required even allowing for the considerable degree of uncertainty over future funding regimes.	no	This information is not appropriate for inclusion in a regional policy document as it will be subject to ongoing change.

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12	Appraisal of the Regional Scale Infrastructure Framework: Transport	The breakdown 'Road and other modes' and 'Rail' is not entirely helpful what are the 'other modes'. The expenditure levels do not appear to support a switch to public transport. On this issue it would be useful to have any information that is available on planned/required spend on vehicles etc for public transport to encourage modal shift. Operators should presumably have such data.	Yes – change made	<p>It is acknowledged that the 'regional scale infrastructure' section did not contain a satisfactory level of information, partially due to lack of information available to the Assembly at the time of drafting.</p> <p>As such, the section has been redrafted. Regional Scale infrastructure is now reported by stating specific proposals that are required to deliver the plans objectives. All schemes in this section were proposed by key delivery agencies.</p>
12	Appraisal of the Regional Scale Infrastructure Framework: Education	It is not clear to what extent the funding figures take account for the changing demographics of the region or the needs of poorer sections of the community for provision of nursery and pre-school facilities.	No	The methodology is clearly set out in the referenced technical reports. It is not considered appropriate to replicate such technical work in the plan.
13	Appraisal of the Regional Scale Infrastructure Framework: Social Infrastructure	The issues raised concerning cultural and sports facilities are interesting. The degree to which social infrastructure is dependent on PFI/developers is of concern for those areas where such infrastructure is already in deficit.	No	It is unclear as to what changes the recommendation proposes.

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13	Appraisal of the Regional Scale Infrastructure Framework: Green Infrastructure	This aspect of the framework needs to be developed. This should be an integral component of the Implementation Plan and should be the task of a key regional stakeholder such as Natural England.	Yes	<p>It is acknowledged that further work is required in relation to green infrastructure. The greatest constraint on developing this aspect is the lack of a proven methodology and mechanism to costing such infrastructure.</p> <p>The Assembly is awaiting the findings of work commissioned by the Environment Agency, which will be submitted to the Panel conducting the EiP.</p>
14	Appraisal of the Sub-Regional Investment Framework: South Hampshire	Coastal defence is an interesting issue. Some areas of South Hampshire have ongoing problems with coastal flooding associated wholly or in part with climate change. The rationale for further investment to protect new development may require further analysis.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery agencies and the local authorities concerned.</p> <p>The Implementation Plan may need to be reviewed as further evidence becomes available.</p>
15	Appraisal of the Sub-Regional Investment Framework: Sussex Coast	The sub-regional strategy identified the need to ensure that new water resource capacity was in place by 2025 to address potential issues of water resource deficits in the East of the sub-region. The inclusion of a new reservoir and new treatment facilities is noted. More detail is required on the timing of the former and the location of the latter.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery Agencies and the Local Authorities concerned.</p> <p>The Implementation Plan will need to be updated to incorporate the findings of the ongoing work by the Environment Agency on environmental infrastructure needs.</p>

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15	Appraisal of the Sub-Regional Investment Framework: Kent Thames Gateway	As indicated in the sub-regional strategy investment in water treatment infrastructure will be required – no locational details are supplied however.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery agencies and the local authorities concerned.</p> <p>The Implementation Plan will need to be updated to incorporate the findings of the ongoing work by the Environment Agency on environmental infrastructure needs.</p>
16	Appraisal of the Sub-Regional Investment Framework: London Fringe	The data on public services and Green Infrastructure appear provisional and will need to be updated.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery agencies and the local authorities concerned.</p> <p>The Implementation Plan may need to be reviewed as further evidence becomes available</p>
17	Appraisal of the Sub-Regional Investment Framework: Milton Keynes and Aylesbury Vale	No specific investments for water infrastructure are currently identified. No details of funding requirements for affordable housing are provided.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery agencies and the local authorities concerned.</p> <p>The Implementation Plan may need to be reviewed as further evidence becomes available</p>
17	Appraisal of the Sub-Regional Investment Framework: Gatwick	The framework identifies a number of potential rail schemes and other public transport improvements but no details of costs or things are provided. Flood defence measures area also identified but again without timing or funding requirements.	No / Yes	<p>The Assembly has sought technical advice on this matter from key delivery agencies and the local authorities concerned.</p> <p>The Implementation Plan may need to be reviewed as further evidence becomes available</p>

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