

South East of England Regional Assembly

**Sustainability Appraisal of
the Draft Implementation
Plan of the South East Plan
(March 2006)**

July 2006

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South East Regional Assembly

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July 2006

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For and on behalf of
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Date: July 2006

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This report presents the results of a Sustainability Appraisal (SA) of the Draft Implementations Plan of the South East Plan. It is the first output in the development of the SA of the Implementation Plan to be presented to the Examination in Public (EIP) in November 2006.

1.1 STRUCTURE OF THE REPORT

This report is structured as follows:

- Sustainability Appraisal Methodology (Section 2);
- Appraisal of the Approach to Implementation of the South East Plan (Section 3);
- Appraisal of the Policy Implementation Framework (Section 4);
- Appraisal of the Regional Infrastructure Framework (Section 5); and
- Appraisal of the Sub-Regional Infrastructure Framework (Section 6);

1.2 AIMS AND OBJECTIVES OF THE SA OF THE DRAFT IMPLEMENTATION PLAN.

Among the recommendations made by the SA of the Draft South East Plan was that an SA of the Implementation Plan should be carried out to ensure that it reflected the issues raised by the appraisal in terms of the challenges to the South East Plan being implemented in a sustainable way. The SA raised concerns over both the scale and the nature of the policy developments and investments that would need to occur to ensure that the Plan was sustainable. It also made it clear that many of the challenges would only be met by innovative actions carried out in partnership with both national and regional stakeholders.

The SA of the South East Plan did not address the Draft Implementation Plan when it was issued in 2006 but the Regional Assembly has committed itself to an SA of the Implementation Plan of which this is the first stage.

The focus of this SA is quite simply 'Does the Implementation Plan address the issues raised by the SA in terms of the overall sustainability of the South East Plan' i.e. is there a clear relationship between the areas where the SA identified a need for action and the Implementation Plan.

This initial SA of the Draft Implementation Plan does not carry out a full SA/SEA of that Plan but takes the form of an audit or gap analysis of the issues raised by the SA and the contents of the plan document. It is designed to highlight both strengths and potential weaknesses of the proposed approach so that these can be reviewed in the context of the ongoing development of the Implementation Plan.

The appraisal of the overall approach of the plan is based on an analysis of the extent to which the plan incorporates the recommendations of the SA on issues of process, partnership, delivery mechanisms etc.

In appraising the Policy Implementation Framework we have used as the basis of our appraisal the appraisal framework used for the SA of the South East Plan but have focused on the issues raised by the SA in terms of delivery and implementation as an additional 'filter' so as to avoid duplication or redundancy of information.

The appraisals of the Regional and Sub-Regional Infrastructure Framework are assessed against the findings of the SA in terms of both the South East Plan and also the sub-regional strategies developed as an integral part of that plan. The appraisal at sub-regional level takes into account the findings of the SA on the key sustainability issues raised by the sub-regional strategies presented in the SA of the Draft Plan.

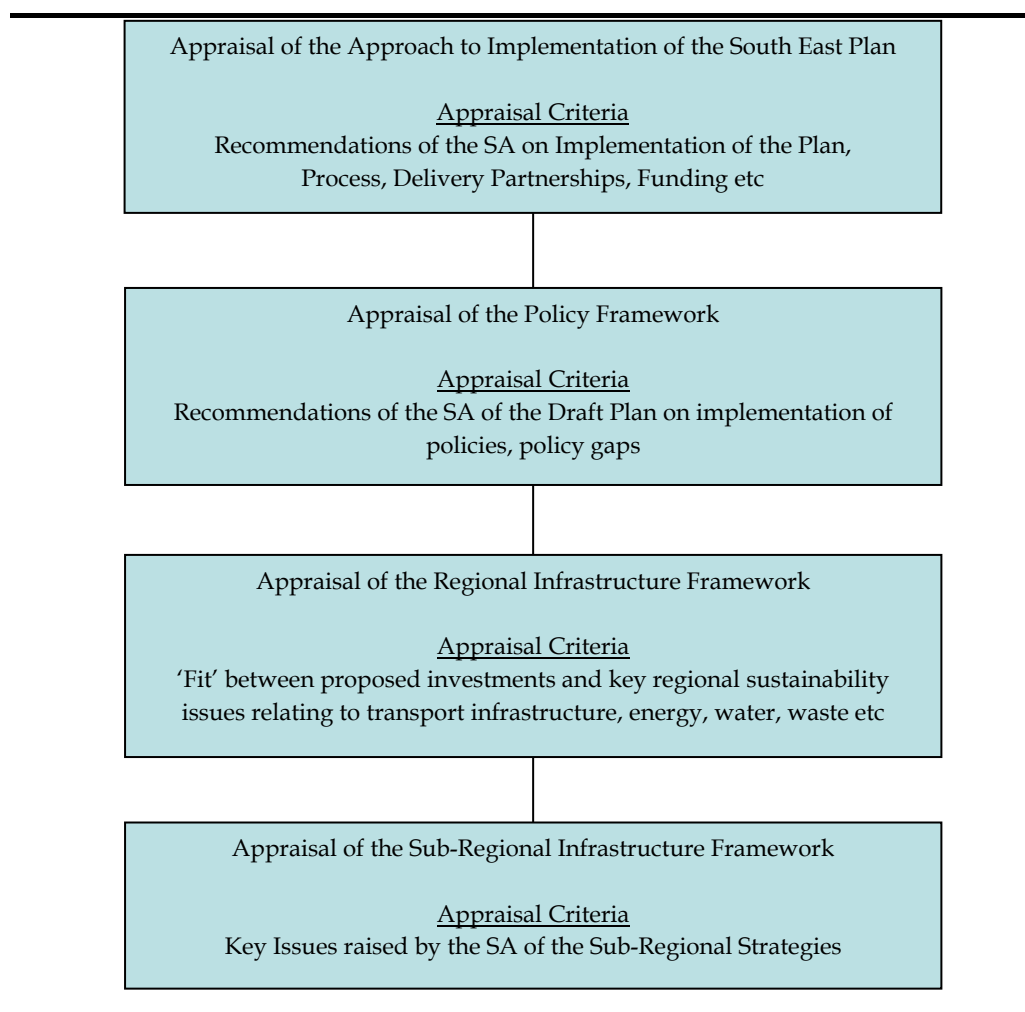
2.1 INTRODUCTION

As indicated in section 1.2 our methodology is a refinement of the SA methodology used for the appraisal of the Draft South East Plan. It is important, we feel, to retain clear links to that methodology for reasons of transparency and 'read-across'.

2.2 METHODOLOGY

The methodology is designed to address in a clear and robust fashion the recommendations and issues raised by the SA concerning delivery and implementation of the Plan and its sustainability and is designed to interrogate the individual components of the Draft Implementation Plan as well as the plan as a whole. Figure 2.1 sets out the key components of the appraisal process.

Figure 2.1 Sustainability Appraisal Process



3 *APPRAISAL OF THE POLICY IMPLEMENTATION FRAMEWORK*

3.1 *INTRODUCTION*

This section of the SA of the Draft Implementation Plan focuses on the overall philosophy and approach to implementation and delivery set out in the Plan.

3.2 *KEY IMPLEMENTATION AND DELIVERY ISSUES IDENTIFIED BY THE SA OF THE DRAFT SOUTH EAST PLAN.*

The conclusions of the SA of the Draft South East Plan were (as set out in Section 10.2 of the SA report) that:

- Implementation of the Plan was likely to contribute to increases in resource consumption, in increased production of waste, increased emissions from transport, increased levels of water resource consumption and less biodiversity;
- Implementation of the Plan would increase the ecological footprint of the region;
- The level of housing provision proposed in the Plan was unlikely to resolve existing issues of homelessness, the backlog of affordable housing etc; and
- The targets in the Plan for affordable housing were unlikely to be deliverable.

The SA also raised issues as to how the Plan could ensure the scale of behavioural change necessary to ensure that the Plan could be delivered in a more sustainable fashion. It counselled caution with regards to the deliverability of the policies on Natural Resource management on this basis.

The appraisal report also makes a number of recommendations concerning the implementation and delivery of the Plan. These were as follows:

- The Assembly and Regional Partners should work with GOSE to identify how to take forward the issues of behavioural change highlighted in the Plan with Central Government. (The SA also recommends liaison with the ERN to progress those issues which are common to all of the English regions);
- The Assembly and SEEDA should work together on the integration of the Plan and the revised RES to ensure that they complement one another;
- The Assembly and Regional Partners should work with SCP-NET on issues relating to resource efficacy and resource consumption and the region's ecological footprint with the aim of integrating SCP-NET's work into the implementation of the Plan;

- The Assembly should develop a programme of policy reviews to enable it to capture significant changes in policy in a way that ensures the continued relevance of the Regional Policy Framework;
- The Assembly should create a research programme that supports the implementation of the Plan and enables the region to regularly test the assumptions on which the Plan and its policies are based; and
- The Implementation Plans of each of the Sub-Regional Strategies should be prioritised, in terms of critical investments needed to deliver the proposed strategies.

The conditions and recommendations taken together provide a broad 'route map' for addressing the concerns of the SA concerning implementation and delivery.

3.3

RESULTS OF THE APPRAISAL OF THE POLICY IMPLEMENTATION FRAMEWORK

The Draft Implementation Plan sets out quite clearly its approach to the implementation of the SEP and the key elements of that approach including the proposed roles of Central Government and regional and sub-regional stakeholders. In terms of the issues raised by the SA the key aspects are as follows:

- The Role of the Implementation Plan

The draft identifies quite clearly the need for the SEP to be integrated with a wide range of other plans and programmes. As it says 'The Implementation Plan is an integral element of the South East Plan and is in effect a business plan for the region'.

It also states quite clearly that 'The Implementation Plan identifies that critical to the delivery of the South East Plan is the need to align the investment decisions of a number of organisations'.

This is indeed critical and may well require a range of organisations to review and rethink their priorities in terms of investment in the region. This is a challenge to organisations whose funding regimes are often developed in silos.

Importantly, this section of the Plan also recognises that 'The Plan is not just about delivery of investment in infrastructure but also maps out the need for stakeholders to work together to effect behavioural change in the way the region uses the full range of resources; natural, physical and financial' this aligns very well with the recommendations of the SA.

- Monitoring and Implementation

The Draft Implementation Plan is committed to monitoring of the implementation of the South East Plan 'on a regular basis'. This is in line

with the recommendation of the SA and the incorporation of key sustainability indicators into the Monitoring Framework for the Plan.

Section 2.3 of the Implementation Plan also notes in the context of progress reporting on the implementation of the Plan that:

‘It may also identify issues associated with the implementation of the South East Plan that need to be addressed. The resulting action required will take one of two forms: either there will be an identified need to work with an organisation to address a specific implementation issue, alternatively there may be a need to undertake a review of the Implementation Plan itself or another part of the policy framework set out within the South East Plan.’

The second of these options is in line with the recommendations of the SA that the Plan and its Implementation Plan should be regularly reviewed based in monitoring evidence and policies and actions updated and amended to make sure that the Plan remains up to date. The results of monitoring of key sustainability trends and of the ‘significant effects indicators’ proposed in the SA may necessitate the review and updating of both the Policy Framework and the Implementation Plan.

- Overarching Approach

Section 3.3 of the Draft Implementation Plan recognises that the ‘demand for and use of resources is a fundamental component of the South East Plan’. It also states that ‘Behavioural changes in particular have the potential to sustainability change the nature of the infrastructure requirements over the Plan period’.

This recognition of the importance of behavioural change as a conditioning or ‘contextual’ factor that may well shape the types of infrastructure the region will require is in line with the recommendations of the SA.

Section 3.4 also raises the issue of the types of investment that may be required and that these may change from those currently in place. This too is in line with the analysis of the SA which mentions the need of the Plan to work with partners on both the scale and the types/sources of funding available to the region.

- Infrastructure Concordat

This is an interesting and potentially valuable initiative. 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 polices to assist the behavioural and other changes necessary to implement the Plan in a sustainable way.

It appears likely that any concordat would need to be with all of the English regions or be part of a framework for regional investments. This would certainly be the case for actions on policy since these would benefit all of the regions.

- Pre-conditions for Effective Implementation

The key link here between the SA and the plan is 6.1(iii) which sets out the case for increasing the level of integration in investment decisions. The work commissioned by the Assembly in partnership with GOSE and SEEDA on delivery and implementation mechanisms will be useful as would any similar work looking at the integration of investment at central level. The recent House of Lords report on the water sector sets out a series of recommendations on the water sector to improve strategic policy-making and investment the Implementation Plan should consider their recommendations. These should also be reflected in the region's work on this topic where relevant.

- Funding Availability

This element of the Plan identifies that current levels of investment in transport and affordable housing are not sufficient. This is a view also expressed by the SA insofar as the SA raises concerns over the need for major investment in public transport and also the current shortfall in provision of affordable housing and the difficulty of meeting the targets set in the Plan.

- Funding Mechanisms

The Draft Implementation Plan sets out a number of complementary options for including and diversifying the funds that could be used to deliver the Plan. This is in line with concerns raised in the SA over the need to review availability/sources of funding.

- Delivery Mechanisms

The approach to delivery set out in the Draft Implementation Plan matches well with the analysis of the delivery mechanisms and changes to methods of delivery set out in the SA.

- Behavioural Change

This is one of the most significant messages coming from the SA ie that without significant behavioural change the South East Plan is not going to deliver growth in a way that is sustainable but will simply contribute to already unsustainable growth patterns in the region.

The coverage of these fundamental issues within the Plan is good in terms of identification of the issues and recognition of the significance of the

issue.

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.

- Regulatory Frameworks

This aspect of the Draft Implementation Plan is very important and is one of the key components of both policy and behavioural change. Not all of the current regulatory frameworks for utilities are necessarily effective in achieving a focus on resource efficiency and efficient consumption. The House of Lords recent report on water highlights this for the water sector.

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.

- Managing the Existing Infrastructure Asset

As the Draft Implementation Plan notes (13.1):

'Although the South East Plan provides the spatial context for the delivery of growth, new development represents a small proportion of the overall demand for infrastructure. Existing patterns for development and activity will continue to place the greatest demands on the region's infrastructure'.

This is in line with the view of the SA that, for example, 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.

4.1 INTRODUCTION

We have carried out an analysis of the Stakeholders and actions identified in the Policy Implementation Framework against the key policy and implementation issues raised by the SA. The results area presented below.








More detailed results are provided in Annex A.







4.2 RESULTS OF THE APPRAISAL OF THE POLICY IMPLEMENTATION FRAMEWORK

Red = Major upgrade required
 Orange = Some issues addressed
 Green = SA issues are addressed

Each one has been 'scored' in terms of how far it addressed the issues raised by the SA in terms of policy implementation.

Key appraisal issues are set out below:

- Provision of decent, affordable and sustainability constructed housing 
- Reducing the risk of flooding 
- Reducing poverty and social exclusion 
- Reducing air pollution 
- Addressing the causes of climate change 
- Conserving and enhancing the region's biodiversity 
- Protecting, enhancing and making accessible the region's countryside and historic environment 

- Reducing road congestion and pollution levels via travel choice and reducing the need to travel 
- Reducing the global, social and environmental impact of consumption of resources 
- Reduce waste generation and disposal 
- Maintain and improve the quality of the region's rivers and coasts and achieve sustainable water resources management 
- Increase energy efficiency, and the proportion of energy generated from renewable sources in the region 
- Stimulate economic revival in priority regeneration areas 

In general the Implementation Policy Framework contains actions on all of these issues. The proposed actions also to some extent address the issues raised by the SA. However, there are some significant gaps in terms of addressing both the RPF and the issues raised by the SA – these will need to be addressed as the framework is developed. We have grouped our comments under the following headings:

- Behavioural Change;
- Addressing the needs of the Plan;
- Linking policy and actions; and
- Performance

- 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. This is not an easy issue but actions to engage with national government and regulations need to be put in place. At present many actions are predicated on a 'predict and provide' philosophy with little attention being paid to management.

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.

- 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. These will require substantial work to be carried out (over a short space of time) to ensure that a more strategic, user-focused, management and investment region is introduced. Whilst this is in line with recent debates on the water industry for example it is not clear what the region intends to do beyond exhortation.

- 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.

- 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.

5 *APPRAISAL FO THE REGIONAL SCALE INFRASTRUCTURE FRAMEWORK*

5.1 *INTRODUCTION*

The SA Team has carried out an appraisal of the Regional Scale Infrastructure Framework in the Draft Implementation Plan to examine how the priorities for investment are aligned with the priorities/areas of concern identified by the SA.

5.2 *APPRAISAL RESULTS*

The results of the appraisal of the Regional Scale Infrastructure Framework are presented according to the investment areas listed in the 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.

- 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.

- Housing

The uncertainties over the types of social-rented housing required are understood. The SA needs to understand the assumptions underlying the figure quoted for affordable housing and what level of delivery this related to.

- 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.

- Health

The degree of uncertainty over how the health sector will function in future and the implications of this for funding at regional level is realistic.

- 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.

- 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.

- Public Services

The commentary on waste disposal is useful and accurately reflects some of the broader issues that will need to be addressed to move towards a balanced picture of the scale and types of investment required.

- Utility Services

Here again, the commentary is useful insofar as it highlights the weakness of the current regulatory systems for both energy and water in terms of strategic planning. The ability to influence such plans will be fundamental to the success of the Plan.

6.1 INTRODUCTION

The SA team has carried out an appraisal of the investment framework for the sub-regions based on the key issues identified by the sustainability appraisal of the sub-regional strategies.

6.2 RESULTS OF THE APPRAISAL

The results for each sub-region are presented below.

- South Hampshire

The South Hampshire Sub-Region Strategy identified a clear need for investment in transport infrastructure – as much to assist non-car uses as to facilitate improved circulation of private vehicles. This is borne out by the investment framework.

The identification of a need for investment in Green Infrastructure is interesting. It would be useful to be able to understand the assumptions which underpin the 10 year requirement set out in the framework.

The need for investment in water infrastructure is in line with issues raised in the sub-regional strategy on the need to invest in new infrastructure to avoid water resource deficits in some parts of the sub-region at the planned levels of development.

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.

- Sussex Coast

Transport links are identified as a major issues within the sub-regional strategy (east-west within the sub-region and north-south connections to the rest of the region). It is not surprising, therefore, to see Trunk Road improvements as one of the key elements within the framework. A number of other road schemes are identified that are associated with the delivery of planned developments or improvements to access.

A series of rail and bus improvements are also listed in the framework which is in line with the need to consider public transport provision identified by the SA.

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.

- East Kent and Ashford

The sub-regional strategy and the SA both recognised the need for improving transport infrastructure in the Ashford Growth area – especially alternatives to the car/lorry. There was less emphasis within the sub-regional strategy on the needs of the remainder of the sub-region.

Whilst the framework clearly indicates a number of road improvements in and around Ashford there are also a limited number of other schemes at other sub-regional centres such as Canterbury and Dover.

There are also a small number of rail projects and some bus schemes for Ashford itself. The spread of projects across the sub-region is still, however, quite limited.

The details for utilities are at present very limited in terms of size, location and cost – more details will no doubt be available as the Plan is developed. This will help to address some of the concerns raised by the SA.

- Kent Thames Gateway

The sub-regional strategy recognised the need for modal shift from road to rail and there are a large number of public transport investments listed in the framework. There are, however, also a large number of road schemes – it would appear that there would be some value in ensuring that road and rail schemes are phased in a way that assists in modal shift where this can be achieved or at least in a way that integrates transport improvements.

As indicated in the sub-regional strategy investment in water treatment infrastructure will be required – no locational details are supplied however.

- London Fringe

The SA identified food risk, transport infrastructure investment, impacts on biodiversity (in particular the Thames Basin Heaths) and potentially water resources as significant issues for this sub-region.

The framework identifies a range of road improvements but also significant investment in rail infrastructure including important regional and sub-regional improvements. There are also a series of proposed improvements to the bus and coach network. All of these proposed investments relate directly to the transport concerns raised by the sub-

regional strategy.

The issue of providing land to mitigate the potential effects of development is included in the framework but, quite reasonably, no costs or timescales are provided. This information is only likely to become available once more work has been done on this issue including the Appropriate Assessment.

The data on public services and Green Infrastructure appear provisional and will need to be updated.

- Western Corridor and Blackwater Valley

The key issues for the sub-region identified by the appraisal of the sub-regional strategy were:

- delivery of sufficient levels of affordable housing;
- accessibility of public transport/development in locations that would reduce the need for travel by car;
- potential issues connected with the Thames Basin Heaths; and
- potential water resource issues requiring a strategic review of likely supply and demand issues.

The framework contains a number of road and rail schemes designed to improve mobility and relieve congestion in the sub-region's transport network. In addition some significant addition to the sub-region's rail infrastructure area proposed.

The Additional funding for affordable housing is mentioned and this matches well in the SA's analysis of the sub-regional strategy.

The Social Infrastructure and Green Infrastructure components of the framework both identify significant funding requirements. This reflects the need to maintain the existing high quality infrastructure in the sub-region. This estimate for mitigation relating to the Thames Basin Heaths is interesting it would be useful to know how it has been developed.

- Central Oxfordshire

The key issues identified by the SA of the sub-regional strategy were as follows:

- Delivery of the targeted level of affordable housing;
- Extensive areas are prone to flooding;
- Problems of congestion; and
- Water resource constraints.

The framework lists a range of improvements to the rail infrastructure of the sub-region and a number of bus/local transport improvements.

Upgrades to both water supply and wastewater treatment are listed but no locational details area supplied. Additional waste management infrastructure is also listed.

- Milton Keynes and Aylesbury Vale

The SA of the sub-regional strategy identified the following key issues:

- The challenge in delivery affordable housing in the sub-region;
- Flood risk around the principal sub-regional centres;
- Investment requirements relating to wastewater treatment; and
- Requirement to improve/upgrade public transport infrastructure including specific improvements to the bus and rail networks.

The sub-regional framework for Aylesbury identifies a number of major road link schemes and a small number of local road schemes. A small number of specific rail schemes are mentioned along with a number of public transport projects in Aylesbury. In the case of Milton Keynes there are also a number of road schemes and some rail schemes (whose status appears uncertain). Public transport upgrades for Milton Keynes are also included in the framework. These proposed investments are all in line with the key issues raised by the sub-regional strategy and the SA.

No specific investments for water infrastructure are currently identified. Now are details of funding requirements for affordable housing are provided.

- Gatwick

The appraisal of the sub-regional strategy for the Gatwick sub-region identified flood risk, air quality and public transport upgrades, and water resources as the key sustainability issues for the sub-region.

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.

Annex A

Appraisal of the Policy Implementation Framework

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
1	ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home?			
1.1	<i>reflect in full, and promote the achievement of, the housing completion targets in RPG9 (28,000 completions/year)?</i>		The SA raises concerns over the extent to which the Draft Plan will be able to deliver the levels of affordable housing that are necessary to meet both existing and expected demand. The proposed target for affordable housing is considerably higher than existing completion rates. Inability to deliver affordable housing in line with current and projected need could lead to a continuing backlog of need and a continuing inability to deal with homelessness and poor quality housing.	The Draft Implementation Plan sets out quite clearly that it expects National Government to ensure that 'additional resources are made available through the Spending Review to support increased provision of affordable housing and investment in the existing stock'. It also expects National Government to revise building regulations 'to raise the quality of new homes, reduce their environmental impact and facilitate future adaptation'.
1.2	<i>increase the supply of affordable housing both in numbers and as a proportion of total housing stock?</i>			
1.3	<i>ensure the provision of housing for the homeless?</i>			
1.4	<i>reduce the percentage of unfit/non-decent homes, eliminating them in the public sector by 2010?</i>			
1.5	ensure the provision of a range of housing in, or accessible to, rural areas?			
1.6	ensure the adoption of sustainable design and construction practices in housing (eg energy/water/land/materials efficiency, incorporation of biodiversity/natural assets etc)?		The SA raises concerns over the need to address the performance of the existing housing stock as this vastly outweighs proposed new buildings in terms of its impact on the region's ecological footprint. Failure to address the existing housing stock of the region will simply lead to a continuance of existing problems in terms of resource efficiency.	The Draft Implementation Plan also foresees a key role for the Regional Housing Board to 'identify new means of funding the provision of affordable housing' and also 'to work with public sector landowners to identify and bring forward suitable land for affordable housing'.
	(See also Question 10.1)			Local authorities are also recognised as having a key role to play in assessing housing need, developing design guidelines and addressing key issues for improved use of the existing housing stock.
2	reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment?			
2.1	<i>prevent all inappropriate development in the flood plain?</i>		Flooding is viewed by the SA as a sub-regional issue. A number of the sub-regional strategies raise flood-risk as a concern and also mention that they are carrying out or plan to carry out Strategic Flood Risk Assessment studies with the Environment Agency. It seems	The Environment Agency is identified as the key partner in terms of advising on flood risk and flood management issues. The preparation of Catchment Flood Management Plans that also take into consideration climate change adaptation is mentioned. These should
2.2	<i>increase the numbers of properties protected by 15,000 by 2010?</i>			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
2.3	<i>require that all new development applications show that sustainable drainage has been considered and implemented wherever practicable?</i>		likely from the information available to the SA that further investment in flood defence/flood resilience will be necessary to enable development in some areas identified for new housing in the sub-regions.	‘influence spatial plans’ – at what scale is not clear. The Environment Agency is also tasked with providing local authorities with robust advice on these issues. 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.
3	improve the health and well-being of the population and reduce inequalities in health?		Health was not considered to be a significant issue per se by the appraisal. However, many of the social determinants of health are closely linked to housing, social and economic exclusion etc.	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.
3.1	<i>substantially diminish inequalities in mortality, health and well-being across the region?</i>		However, the potential of non-delivery of levels of housing adequate to deal with existing issues of affordability and homelessness (primarily in the social sector) could perpetuate existing pockets of poor health in the region linked to social and economic exclusion.	
3.2	ensure the accessibility of healthcare services by non-car means, eg through the incorporation of services in new developments?			
3.3	promote healthy, active lifestyles through the protection and provision of facilities and locations of sporting/recreational activities (eg playing fields, sports facilities, footpaths etc)?			
4	reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region?		The Draft Plan contains policies that are focused on tackling the sub-regions where social and economic deprivation are of most concern. The key issues raised by the SA were the need to address housing and job issues in the communities that are suffering from deprivation. The sub-regional strategies raise some concerns as to whether housing will deliver the type of employment that is required. There remains a question mark as to whether the spatial strategy of the plan will actually address the needs of the most deprived areas in the region.	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. The Draft Implementation Plan also identifies the RES as being key to addressing issues of social exclusion. It is not clear how policy S1 on Social Inclusion will be taken forward.
4.1	<i>contribute towards a halving the gap between the most disadvantaged communities and the average position of the region by 2010?</i>			
4.2	ensure the provision of employment land and housing in, or accessible to, the most deprived areas of the South East?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
5	raise educational achievement levels across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan.	
5.1	ensure the accessibility of educational/training opportunities by non-car means?			
5.2	ensure the accessibility of educational/training opportunities for the most deprived communities?			
5.3	ensure the accessibility of educational/training opportunities for rural communities?			
6	reduce crime and the fear of crime?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan.	
6.2	promote the incorporation of 'secured by design' principles as part of good urban design in housing and employment sites?			
7	create and sustain vibrant communities?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan by the SA.	
7.1	encourage the involvement of communities in the planning and management of their neighbourhoods?			
8	improve accessibility to all services and facilities?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan by the SA.	
8.1	promote compact, mixed-use development with good accessibility to local facilities and services (eg employment, education, health services, shopping, leisure, green spaces, culture etc), that reduce the need to travel?			
8.2	ensure that facilities and services (eg employment, education, health services, shopping, leisure, green spaces, culture etc) are accessible to rural communities?			
8.3	protect and enhance access to facilities and services for rural communities?			
9	encourage increased engagement in cultural activity across all sections of the community in the South East?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan by the SA.	
9.1	ensure that facilities and locations for cultural activities are protected and provided?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
10	improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance?		Not considered to be a significant issue by the SA in terms of the implementation of the Draft Plan by the SA. However, aspects of re-use are relevant to encouraging resource efficiency within the philosophy of design and construction associated with the Plan.	
10.1	<i>ensure the provision of employment land and housing on previously-developed land, as opposed to greenfield sites (in line with the sequential approach) and through conversion of existing buildings, to ensure that 60% of all forms of development (not just housing) occurs on previously used land by 2008?</i>			
10.2	encourage the reuse of materials in construction?			
10.3	ensure the adoption of sustainable design and construction practices in non-housing developments (eg energy/water/land/materials efficiency, incorporation of biodiversity/natural assets etc)?			
10.4	require good design to create attractive, high quality environments where people will choose to live?			
11	reduce air pollution and ensure air quality continues to improve?		This is a key issue for the SA both in terms of air quality relating to emissions from transport/congestion and also in terms of Climate Change. Investment in infrastructure and technologies that will reduce emissions and encourage the use of public transport is seen as critical as are policies and actions to bring about behavioural change and also measures to manage demand more effectively with regard to transport. The management of transport issues is seen as fundamental to the region being able to stabilise its ecological footprint. The SA recommends that these issues are addressed in the Implementation Plan.	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.
11.1	promoting more sustainable transport patterns in all areas, particular those of low air quality (eg AQMAs), including public transport, walking and cycling (see also Objective 15)			
11.2	addressing the air quality impacts arising from specific development activities (eg airports, energy generation etc)?			
12	address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts?		The SA raises concerns that the Draft Plan will lead to an increase in CO ₂ emissions without investments in infrastructure, policies that lead to behavioural change (including demand management) and also measures to improve efficiency. Without such actions CO ₂ emissions	The region has agreed a 'Climate Change Implementation Plan' as a framework within which delivery agencies and stakeholders should work. It will be important to assess the extent to which the Implementation Plan and actions to tackle climate change are linked.
12.1	require that development proposals are guided by 'climate proofing' principles?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
			will increase and the region will fail to stabilise its ecological footprint. The Draft Plan will exacerbate existing trends whilst it has a potential opportunity to alter behaviour and performance to a more sustainable pattern of development.	
13	conserve and enhance the region's biodiversity?		Impacts on biodiversity are signalled by the SA as being a potentially significant effect of the implementation of the Draft Plan. Since the Assembly is already assessing the possible effect on Natura 2000 sites via a screening exercise and the EIP may very well request an Appropriate Assessment it would appear that this issue is largely being addressed at strategic level. More work will be required at LDF level.	English Nature and in future Natural England) is tasked with leading activities relating to the protection and improvement of biodiversity. The Draft Implementation Plan says that this role is to 'Ensure that existing biodiversity is protected and encourage delivery of targets for improvement by working with landowners and managers, voluntary conservation bodies and local planning authorities. This will include identifying areas of potential improvements at local level and mechanisms to influence landowners and managers'. 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.
13.1	protect, enhance and restore the region's designated sites?			
13.2	protect, enhance and restore the region's priority habitats and species, and ensure the delivery of regional biodiversity targets?			
13.3	encourage the development of new biodiversity assets in developments?			
14	protect, enhance and make accessible for enjoyment, the region's countryside and historic environment?		The potential erosion of the character of the region's historic and natural environment has been raised as a potential cumulative effect of the Plan.	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 the Natural England is seen as a supporting/education role - we would recommend that this is reviewed. 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
14.1	protect, enhance and restore the region's natural environmental assets (eg the green belt, parks and green spaces, common land, woodland and forests, National Parks, AONBs, ESAs etc)			
14.2	protect, enhance and restore the region's cultural and heritage assets (eg Heritage Coasts, World Heritage Sites, SAMs, Listed Buildings, Historic Parks and Gardens, Conservation Areas)?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
14.3	promote the accessibility of the region's countryside and historic environment in sustainable and well-managed ways?			<p>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 does into 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>
15	reduce road congestion and pollution levels by improving travel choice, and reduce the need for travel by car/lorry?		<p>This issue is significant for the SA since it is directly linked to both air quality and climate change and is also a major determinant of the region's ability to stabilise its ecological footprint. The SA recognises that the Draft Plan will need to create an 'enabling environment' for transport management that comprises investment in new infrastructure, demand management and behavioural change. It is recognised that all three represent a significant challenge and will require action from a range of stakeholders including Central Government.</p>	<p>The Draft Implementation Plan, not surprisingly, identifies a key role for National Government in terms of ensuring that national investment programmes reflect regional priorities. It also recognises that the Spending Review should assist in supporting improved levels of accessibility at local level.</p> <p>Delivery agencies such as the Highways Agency and Network Rail are tasked with ensuring that their investment programmes reflect regional priorities and that 'programmed schemes are delivered on time and within agreed budgets'.</p> <p>This is logical – 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'.</p>
15.1	promote more sustainable transport patterns in all areas, particularly those with high congestion, including public transport, walking and cycling?			
15.2	promote more sustainable transport patterns in rural areas?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
16	reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products?		The need to address resource efficiency in order to stabilise the region's ecological footprint is highlighted in the SA. This requires clear 'direction' from the RPF and demonstration within the Implementation Plan that issues of resource efficiency are integral to the delivery of the Plan.	This issue is addressed to a certain extent via the Implementation Frameworks policies addressing recycled materials for construction etc. However, the overall issue of the impacts of resource consumption and production is not clearly identified as a delivery issue.
16.1	promote the use of locally and sustainably-sourced, and recycled, materials in construction and renovation?			
17	reduce waste generation and disposal, and achieve the sustainable management of waste?		The SA concludes that the Draft Plan is, without investment and above all a focus on behavioural change and resource efficiency and resource consumption, likely to lead to an increase in waste arisings. This, in turn, will have a negative effect on the ability of the region to stabilise its ecological footprint.	Here again the Draft Implementation Plan identifies a number of stakeholders who each have responsibilities for assisting within the delivery of the Plan. 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. 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)'. 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'. 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.
17.1	promote sustainable waste management practices in all sectors and at all levels through the provision of a range of appropriate waste management facilities?			
17.2	promote waste minimisation?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
18	maintain and improve the water quality of the region's rivers and coasts, and achieve sustainable water resources management?		The SA concludes that the Draft Plan is likely to lead to increased water consumption and water stress both in terms of water quantity and water quality. The majority of the sub-regional strategies raise concerns over the availability of water resources (and the need for investment in new infrastructure). A minority of sub-regions are also concerned about water treatment infrastructure. The SA raises concerns over the extent to which the Draft Plan will be able to bring about the behavioural change required to bring about a genuine 'twin track' approach to the management of water resource. Stabilisation of PPC of water will require a major effort in terms of both new and existing housing and residents.	The Policy Implementation Framework identifies roles for the Environment Agency, OFWAT and the Water companies as key stakeholders in the delivery of water policies. The role of the Environment Agency is very much the status quo. The role of OFWAT and the Water companies is seen as being, in the case of the former, providing a long-term structure and investment framework that encourages strategic investment in water resource and waste water treatment. In the case of the water companies their role in implementing the Plan is to 'Ensure that Water Resource Plans are based on growth levels identified in the South East Plan demonstrate the need and locational requirements of schemes and communicate this at an early stage'. 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. The reference to the Building Regulations needs to be far less generic in terms of what needs to be done.
18.1	<i>promote compliance with river ecology standards needed to meet the requirements of the EU Water Framework Directive ?</i>			
18.2	<i>promote compliance with guideline standards in the EC Bathing Waters Directive?</i>			
18.3	<i>stabilise PCC of water at current levels?</i>			
18.4	<i>ensure water supply and demand are in balance to maintain security of supply, where appropriate by providing new water resource infrastructure?</i>			
19	increase energy efficiency, and the proportion of energy generated from renewable sources in the region?		Energy efficiency of new and existing housing is clearly linked to the resource efficiency and likely development of the region's ecological footprint. The Implementation Plan should assist in the increased development of renewables and improvements in the energy efficiency of new and existing development in the region.	The Draft Implementation Plan identifies a number of stakeholders who have key roles in helping to deliver the policies within the Plan relating to energy efficiency and renewable energy. In the case of National Government – the role is framed in a very generic way in terms of revising the building regulations. The Plan
19.1	<i>provide for the establishment of renewable energy developments at a regional level, to ensure that renewable energy targets are achieved (eg 16% of generation capacity by 2026)?</i>			
19.2	<i>promote the incorporation of small-scale renewables in developments?</i>			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
				needs to be much clearer on what needs to be revised and to what level. OFGEM is tasked with setting a regulatory framework that 'takes a sufficiently long-term view to provide strategic investment in renewable energy and support improved energy efficiency'. Again this is all quite vague – it does not address issues of performance, demand management, behavioural change etc. The role of the energy industry is also quite vague and generic.
20	ensure high and stable levels of employment so everyone can benefit from the economic growth of the region?		Not viewed as a significant issue for the implementation of the Draft Plan for the SA.	
21	sustain economic growth and competitiveness across the region?		Not viewed as a significant issue for the implementation of the Draft Plan for the SA.	
21.1	<i>narrow the gap in GVA per capita between the best and worst performing parts of the region?</i>			
22	stimulate economic revival in priority regeneration areas?		The SA raises issues, based on its analysis of the sub-regional strategies, as to the extent to which adequate and appropriate levels of employment will be delivered in regeneration areas as a result of implementation of the Plan. This raises issues as to the extent to which the Implementation Plan contains actions that are likely to assist in stimulating economic renewal in regeneration areas. These should include links to the RES.	The Draft Implementation Plan also identifies the RES as being key to addressing issues of social exclusion.
23	develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities?		Not viewed as a significant issue for the implementation of the Draft Plan for the SA (but important to see links to the draft RES).	
23.1	support the development of access to broadband infrastructure, particularly in rural and deprived areas?			

	Does the plan/option...		Comments/Recommendations from the SA Report	Assessment of the Draft Implementation Plan (based on the Policy Implementation Framework)
24	encourage the development of a buoyant, sustainable tourism sector?		Not viewed as a significant issue for the implementation of the Draft Plan for the SA.	
25	develop and maintain a skilled workforce to support long-term competitiveness of the region?		Not viewed as a significant issue for the implementation of the Draft Plan but clearly linked to the provision of affordable housing.	
	(See also Question 5)			

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