

Annex G

List of all
Recommendations
/Mitigation Measures

This Annex presents a summary of the recommendations or proposed mitigation options that are indicated in the text of the Sustainability Appraisal report itself and in the annexes to the report. They are structured as follows:

- Principal recommendations from the Main Report
- Recommendations and mitigation actions relating to the regional Policy Framework
- Recommendations on Addressing Data Gaps and Deficiencies
- Recommendations relating to the Implementation Plan and Policy Framework.
- Recommendations on the Sub-regional Policy Framework

This annex does not contain recommendations from previous phases of the appraisal. These, insofar as they relate to the Plan and Policy Framework, are summarised in Annex F of this report.

G1.1

PRINCIPAL RECOMMENDATIONS FROM THE MAIN REPORT

The recommendations of the Sustainability Appraisal are as follows:

Regional Policy Framework

- It is recommended that a Sustainability Appraisal of the Implementation Plan is carried out to ensure that it reflects the issues raised by this appraisal.
- The Assembly should carry out an audit of the Regional Policy Framework to ensure that the cross-cutting policies are adequately embedded in the sectoral policies.
- The Assembly should consider creating a new section of the Regional Policy Framework bringing together policies of relevance to Climate Change.
- The Assembly should develop a system for assessing the compliance of LDFs with the Regional Policy Framework.

Monitoring

- The Regional Observatory should be tasked with collecting monitoring data and carrying out research into the Significant Effects Indicators in partnership with the relevant regional agencies.
- An independent body should be appointed to monitor the overall sustainability of the Plan and should be tasked with producing an annual report to be issued alongside the Annual Monitoring Report.

Policy Development

- 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. They should also liaise with the English Regions Network since the issues are common to all regions, simply more acute in the South East.
- The Assembly and SEEDA should work together on the integration of the Plan and the revised RES to ensure that they complement one another.

Taking the Plan Forward

- The Assembly and Regional Partners should work with the Sustainable Consumption and Production Network (SCP-Net) on issues relating to resource efficiency 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.
- The outcomes from the SEA's of LDFs should be collected together and used as the basis for a review of the sustainability of the Plan.
- The Implementation Plans of each of the Sub-Regional Strategies should be prioritised, in terms of critical investments needed to deliver the proposed strategies.

G1.2

RECOMMENDATIONS AND MITIGATION ACTIONS RELATING TO THE REGIONAL POLICY FRAMEWORK

- Consideration should be given to creating a separate section of the Policy Framework dealing with Climate Change which could bring together 'sectoral' policies.
- The strategy identifies areas where a particular focus is needed on regeneration, but there are only quite vague policy commitments in the Preferred Spatial Strategy for these specific areas. It is recommended that a policy commitment be made to ensuring the accessibility of employment land to deprived communities, so that there is a balance between improving the employment opportunities for deprived areas and encouraging further in-migration to already dynamic areas.

G1.3

RECOMMENDATIONS ON ADDRESSING DATA GAPS AND DEFICIENCIES

- The Assembly and Regional Partners should work closely with the Sustainable Consumption and Production Network (SCP-NET) to ensure that it takes advantage of government research and information in this important policy area.
- The waste production indicator for per capita production is not currently part of the Monitoring Framework of the Plan we recommend that it is added.

G1.4

RECOMMENDATIONS RELATING TO THE IMPLEMENTATION PLAN AND POLICY FRAMEWORK.

- Since it will not be possible for this appraisal to carry out an appraisal of the final Implementation Plan it is recommended that such an appraisal is carried out to ensure the overall coherence of the Policy framework, the Implementation Plan and the objectives of the IRF. The lack of spatial definition in the Plan makes it difficult to assess the extent to which current and future infrastructure will be maintained and built so as to effectively service existing and future residents of the region and the regional economy. At present there are not prioritised lists of infrastructure at regional and sub-regional level. Prioritisation of schemes and sensitively analysis of schemes and sensitively analysis of schemes versus the development model should be a priority.
- The strategy contains measures across a range of policy areas which encourage the protection and enhancement of the natural and historic environment. This covers both designated and undesignated assets. Sites important for biodiversity are protected in the strategy and it contains a number of measures for biodiversity gain. However, the impact on natural assets, particularly biodiversity, of development on non-designated sites is not possible to predict because of the level of detail available on development locations. This will need to be re-assessed at the LDF Stage. There needs to be a stronger emphasis in relevant policies to promoting the links between biodiversity protection/enhancement, access and recreation, and health and well-being. This should be reflected in the Implementation Plan.

G1.5

RECOMMENDATIONS ON THE SUB-REGIONAL POLICY FRAMEWORK

- Given the degree of uncertainty regarding the achievement of targeted levels of provision expressed in Sub-Regional Strategies it is recommended that the sub-regional targets and, in particular mechanisms for their delivery are reviewed as an integral part of the detailed implementation of the South East Plan. If there are no clear indications as to how targets will be achieved then this raises serious

questions as to the deliverability of this aspect of the Plan. Delivering on affordable housing is vital to the economy of the region and to the ongoing development of balanced, sustainable communities.

- The opportunity to consider innovative waste management and waste reduction schemes as an integral part of the sub-regional delivery of the plan needs to be grasped. It should form an important part of sustainable design and construction.
- The Sub-Regions are all aware of the importance of sustainable design and construction. None of the strategies provides detailed policy or guidance on these issues which is largely viewed as being the prerogative of the Plan and the LDFs. In the Growth Areas a more sub-regional approach could be adopted, existing and proposed research and guidance for the Thames Gateway should be incorporated more fully into regional and sub-regional thinking and policy.
- Policy TSR1 – mentions the need for environmental initiatives and sustainable development objectives – these should address the risk of coastal flooding and the management of flood plains in coastal areas.
- Policy NRM4 on conserving and improving biodiversity could have benefits by encouraging appropriate recreation in areas of biodiversity value, for the twin gains of improved health and fitness and raised awareness of biodiversity value. It is recommended that the promotion of recreation is made more explicit in this policy, as in NRM5 (Woodlands). NRM7 seeks to improve health by reducing air pollution and exposure to it. These policies could be linked to policy S3.
- Policies C1 to C4 can contribute to health and well-being by protection and management of the countryside within and outside designated landscapes. It is recommended that a stronger emphasis should be given to access and appropriate recreation as a component of land management. More emphasis should be placed in Section D6 of the Policy Framework on the benefits of the countryside not least in terms of the wider health agenda.
- Policies TC1, TC3 and TC4 promote the need for public transport accessibility. Policy T6 on Mobility Management also seeks ‘a rebalancing of the transport system in favour of non-car modes’. Clearer links between these policies and policies such as S4 should be made. There are clear links between health service planning, access to facilities, and health issues.
- If ‘special measures’ or policies are introduced to tackle affordability hotspots these should be linked as appropriate to Policy S1 and other policies in Section D9.

- It is recommended that policy RE4 is strengthened to include a specific focus on deprived areas.
- Policy S8 on planning of community infrastructure could be improved by a clear requirement to involve communities in the planning of their own neighbourhoods. The supporting text could include a reference to good practice models e.g. Parish Plans. In addition, Policy S1 needs to recognise that the involvement of local communities is fundamental to successfully tackling social inclusion – the ‘where necessary’ should be deleted.
- Policy H3 requires that new housing should be have the necessary infrastructure, services and community provision, or where this provision is planned, and should generally be in locations that are, or can be, well-served by a choice of transport modes. It is recommended that “generally” is deleted and that “can be” is replaced by “will be”.
- Policy TSR4 on Tourism Attractions states that “New, regionally significant tourism attractions should only be developed, and can be easily accessed by public transport”. The same should be true for the sporting facilities promoted under Policy TSR3.
- Policies promoting tourism and sports facilities should also include requirements for sustainable construction and the use of recycled materials.
- Policy T10 sets out policy on airports. This should be strengthened in favour of public transport access, given the current and likely future impacts of increasing passenger numbers on roads and air quality in the region. It is recommended that the last paragraph is reworded “Airport Surface Access Strategies must decrease reliance on the car/lorry and increase the use of alternative modes of transport” and that targets are included. The current wording of ‘A reduction in the environmental impact of surface access’, is not effective and will not assist in effective monitoring of these strategies.
- Policies CC1 and CC2 are also of direct relevance to biodiversity because of the issues of environmental limits and management of species and habitats they contain. Policy CC2 should be expanded to cover biodiversity issues relating to climate change beyond sustainable flood management. This is not by any means the only issue of relevance.
- Section D7 of the Policy Framework – Management of the Built Environment recognises (section 2.11) the importance of ‘Historic Character, Distinctiveness and Sense of Place’. This follows through to policies such as BE1, BE5 and in particular BE7. There are also clear links to tourism policies although these are not well developed

in the framework and should be made more evident in the regions approach to tourism assets and their management. There are also links to the RES (see Section 8.2 of section D7)

- Section D7 of the Policy Framework should be revised to include explicit policy provisions relevant to cultural and heritage assets.
- Policy T6 states that Airport Surface Access Strategies should set out ways of achieving a modal shift in favour of public transport. It is recommended that this is reworded “Airport Surface Access Strategies must decrease reliance on the car/lorry and increase the use of alternative modes of transport” and that targets are included.
- Policy TSR2 on Rural Tourism mentions the promotion of rural diversification and rural development initiatives – local products should be an integral part of this. Any local product strategies will need to be linked with initiatives linked to the RES and Sustainable Food and Farming, etc.
- Policy S3 should include a requirement for health facilities to minimise waste production.
- The tourism policies in the framework should be modified to refer to the use of renewables with the energy supply of major tourist attractions and sports facilities.
- TSR6ii – Replace first “should” with “must”.
- H5 – Add “Developers should be required to demonstrate no adverse impacts on services and infrastructure, including transport infrastructure, from high density development.”
- T1 – Replace “should” with “must”.
- T2 – Replace “should” with “must”. Add “vi improvements in the availability and quality of public transport services; vii promotion of alternatives to the car and lorry”.
- T9 – Replace “should” with “must”.
- BE1 – In first paragraph, replace “should” with “must”.
- TC4ii) – This should be a clear requirement, not a recommendation.
- S6iii) – Should be an explicit requirement and “seek to” removed.
- S3 – Replace “should” with “must” H3H.

- T5 – local authorities should be required to improve both the quality and availability of public transport services along regional spokes, reflecting the supporting text in paragraphs 1.29-1.31.