

Annex D

Detailed Analysis
of Consultation
Responses on the
SA

Table D1.1 *Comments on Appraisal process and questions*

Consultee	Issue Raised by Respondents	SA Response to Issues Raised
	<ul style="list-style-type: none"> <i>Lack of clarity over how the RES has taken account of the SA/SEA findings:</i> Include a separate paragraph on page 2 stating how the RES has taken into account the findings of the SA, in particular those effects of relevance to the SEA, as required under the SEA Directive. 	The SA report now contains a detailed analysis of how the appraisal has influenced the RES (see Section 2 of the Report)
	<ul style="list-style-type: none"> Section 2.6.5: <i>The omission of the detailed record of how the appraisal has influenced the RES is disappointing, as the value and influence of the SA/SEA process are unavailable for comment.</i> 	See above
	<ul style="list-style-type: none"> <i>Need for a clear implementation plan:</i> The appraisal findings demonstrate the need for a clear implementation plan, which should demonstrate how the actions/targets of the RES will be delivered, and how the negative impacts on the IRF indicators will be mitigated for. A clear decision making framework is required for deciding what should happen if a particular action has negative effects. It is essential that the implementation plan and monitoring framework, once developed, go through the SA/SEA process as this is the only real test of whether the RES will deliver. Section 5 sets out decisions that need to be made for monitoring the RES, but does not set out who will make these decisions, and when. (Section 4.3, Table 4.1, Section 5, Section 6.6) 	There will be a separate RES Implementation Plan that will be developed by SEEDA during late 2006/early 2007. The will have an SA.
	<ul style="list-style-type: none"> <i>Mitigation:</i> The current lack of mitigation measures is a failure of the SA/SEA report and should be addressed as a matter of urgency. More specific mitigation measures are needed to address the current failure to meet key IRF targets. (Section 4.10, 6.6) 	
	<ul style="list-style-type: none"> <i>Alignment of processes:</i> Pleased that the RES drafting and SE/SEA processes have been more closely aligned, with the consultation period being the same for both documents. 	SEEDA and ERM have co-ordinated inputs to both processes to ensure their alignment.

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	<ul style="list-style-type: none"> <i>REEIO Model:</i> Pleased that the REEIO model was used. Expect the outputs from this model and the workshop to feed directly into the processes of drafting the final RES and SA/SEA report and would like to see more of the modelling work included. 	The REEIO model has been used by SEEDA in the research underlying the RES and the model is discussed in the RES Evidence Base. The SA recommends further use of REEIO in the future.
	<ul style="list-style-type: none"> <i>Relationship between sustainability and environmental report:</i> Table 1.1 is useful but needs to be expanded, and an additional table included in an Annex comparing the results of the SEA process Quality Assurance Checklist with the requirements of the SEA Directive. 	The SA Steering Group carried out a gap analysis of the Draft SA report against the SEA QA/QC checklist. The output from this work has been incorporated into the revisions of the SA.
	<ul style="list-style-type: none"> <i>Need for an implementation plan/mitigation measures:</i> The SA/SEA cannot properly assess the RES, as without an implementation plan the delivery on the objectives is still unclear. An SA/SEA should be carried out on the IP and the Steering Group should be involved in this. While the intention to include mitigation measures in the final reports is welcomed, it will be difficult to base these measures on the implementation plan when this is not due out until the final RES is published. 	As indicated above a separate RES Implementation Plan will be produced on which an SA will be carried out.
	<ul style="list-style-type: none"> <i>Lack of clarity over how the RES has taken account of the SA/SEA findings:</i> Evidence must be provided on how the SA/SEA report and RES comments have been taking in to account in finalising and adopting the final RES. Annex D should be expanded to provide this evidence. A large number of specific comments are presented relating to Section 4.3 of the SA/SEA that need to be addressed in the RES and associated implementation plan. 	Please see comments above. Annex D addresses the responses of consultees to the SA.

Table D1.2 *Comments on Appraisal Findings*

Consultee	Issue Raised by Respondents	Responses to Issues Raised
	<ul style="list-style-type: none"> Table 1.1: Include more explicit reference to where in the SA/SEA report the requirements of the SEA Directive have been met. 	This has been addressed in Section 1 of the SA report.

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	<ul style="list-style-type: none"> <i>Amendments to IRF objectives:</i> Generally welcome the approach to IRF but note a variety of specific amendments. (Table 3.1) 	The SA has amended the detailed appraisal questions during the appraisal process. Amendments to the IRF's objectives will need to form part of the review of the IRF.
	<ul style="list-style-type: none"> <i>Appraisal of alternatives:</i> Welcome the inclusion of alternatives, there is no indication of how each of the alternatives performs against sustainability criteria, and no reference to the environmental effects of each scenario. (Section 4.2) 	This issue has now been addressed in Section 4 of the main SA report.
	<ul style="list-style-type: none"> <i>Appraisal findings:</i> In general the findings support views on the effects of the strategy. In light of the negative/uncertain assessments given for many of the objectives (11, 12, 15, 13, 18), serious doubts must be raised as to whether the RES could be considered to be sustainable. (Section 4.3) 	The SA discusses the performance of the RES against the IRF's objectives and clearly indicates where it considers that effective delivery of the Strategy will depend on modifications to national level policies and initiatives.
	<ul style="list-style-type: none"> <i>Sustainable consumption and production:</i> more details required on how the region is going to influence government on behavioural change, and reduce its footprint through practical measures. (Section 4.4) 	The SA notes that the region's achievement of a stabilisation or reduction of its ecological footprint is contingent upon action by Central Government and cannot be delivered by the RES alone.
	<ul style="list-style-type: none"> <i>Cumulative effects:</i> The inclusion of this section is a positive improvement, but further work is required to clearly describe what the cumulative effects will be. (Section 4.8). 	The Cumulative Effects of the RES have been reviewed again by the SA team and the information on these effects have been updated for this report.
	<ul style="list-style-type: none"> <i>Evaluation of the environment:</i> This is a useful addition, though it should be placed earlier in the report to provide the context within which the RES is assessed. (Section 4.8) 	The comment is noted but after due consideration the position of this section has been retained.
	<ul style="list-style-type: none"> <i>Global trade:</i> It is disappointing that the SA/SEA does not highlight the environmental issues related to increased global trade. (Section 6.2-6.5) 	The SA has updated its appraisal of this issue and the related IRF objective.

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	<ul style="list-style-type: none"> <i>Green infrastructure:</i> Propose that improvement in the quality and quantity of green infrastructure, along with an associated skills programme, are included as part of the conclusions (Section 6.2-6.5) 	The importance of Green Infrastructure is emphasised within the SA and is recommended for increased focus within the RES Implementation Plan.
	<ul style="list-style-type: none"> <i>Appraisal of alternatives:</i> The final SA/SEA report should include an assessment of the potential impact of the alternative scenarios, including justification for why the option in the RES was chosen. The path of how the options were appraised should also be included in the final SA/SEA report. 	See above.
	<ul style="list-style-type: none"> <i>Conflicts between objectives:</i> Although some conflicts between SA/SEA, RES and other plan's (eg South East) objectives are mentioned, these are not always described and should be brought forward so that they are more obvious. 	The SA, in commenting on the RES reinforces the need for alignment of regional strategy including the RES and the RSS. This should be addressed in the RES Implementation Plan.
	<ul style="list-style-type: none"> <i>Detailed comments on NTS:</i> Specific comments are provided relating to Section 4.5 of the NTS, relating to the need to prevent further pollution of water, a discrepancy between renewable energy targets, and an explanation of why quoted targets are unambitious. 	These comments have been removed and the NTS of the RES has been adjusted.
	<ul style="list-style-type: none"> <i>IRF Objectives:</i> The RES comments contain a number of specific comments relating to the IRF objectives and the way they are addressed in the SA/SEA and RES. 	These have been reviewed and have been addressed wherever possible. However, some of the issues raised would be most appropriately addressed in the context of a review of the IRF.
	<ul style="list-style-type: none"> <i>Annex C:</i> Specific comments are made for changes to IRF Objectives 2, 3, 10, 13 and 18. 	As discussed above – amendments to IRF objectives should be made in the context of a review/update of the RES.

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	<ul style="list-style-type: none"> • <i>Report structure:</i> SA/SEA needs an executive summary and clear signposting as to what the document is for and what its main conclusions are. 	<p>The SA report has a non-technical summary and a table signposting where the components of the appraisal are located in the SA report.</p>
	<ul style="list-style-type: none"> • <i>Level of modelling:</i> The level of useful modelling undertaken to identify the true sustainability of the RES is not sufficient to be truly confident as to the plan's real sustainability. Impacts of economic development on water, air quality, waste and energy are highlighted but the level of scientific detail and modelling required is not included. 	<p>The development of the RES has been informed by the use of REEIO and the ISEW . The SA agrees that more modelling works should be carried out to inform the implementation of the RES.</p>
	<ul style="list-style-type: none"> • <i>Conflict between economic and sustainable development:</i> Conflict exists between the assumption of continuing economic development and the real ability of the region to develop sustainably. These uncertainties have not been made fully explicit. 	<p>The SA highlights the key uncertainties regarding the factors that will condition the sustainability of the model of growth proposed in the RES.</p>
	<ul style="list-style-type: none"> • <i>Appraisal of alternatives:</i> Realistic alternatives have not been explored because the RES clearly identifies an assumption of economic development. The environmental effects have been identified but by necessity are limited. 	<p>The SA has appraised a range of alternatives and has highlighted their implications for the sustainable development of the region.</p>
	<ul style="list-style-type: none"> • <i>Evaluation of environmental effects:</i> The SEA makes a start in this area but more needs to be done. 	<p>The SA of the final RES has reviewed the likely environmental effects of the RES and has identified some potentially significant effects. These will need to be addressed by mitigation actions in the RES Implementation Plan.</p>

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	<ul style="list-style-type: none"> <i>Mitigation:</i> The RES is by necessity high level and therefore the full range of mitigation measures cannot be considered in the SEA. 	<p>The SA has sought to identify mitigation measures for the potential effects of the RES. These will need to be reviewed during the development of the RES Implementation Plan both by SEEDA and the SA team.</p>
	<ul style="list-style-type: none"> <i>Implementation Plan:</i> The RES lacks a clear implementation plan and therefore it is difficult for the SA to produce an analysis. 	<p>See previous comments on the RES Implementation Plan and its SA.</p>
	<ul style="list-style-type: none"> <i>Decision making:</i> The difficulties in gaining information and making true assessments for the future are not as clearly explained as they might be. 	<p>This comment is an important one which needs to be fed into the development of the RES Implementation Plan and the detailed monitoring framework.</p>
	<ul style="list-style-type: none"> <i>Monitoring:</i> The SEA would benefit from more clarity about monitoring issues. 	<p>The SA emphasises the need for a more detailed analysis of monitoring issues as an integral part of the development of the RES Implementation Plan and its SA.</p>