

**East of England Implementation Plan
Cambridgeshire Response to EEDA
(On behalf of Cambridgeshire County Council and Cambridgeshire
Horizons)**

Deadline: 3rd July 2009

Response to be entered at EEDA Website at:

www.eeda.org.uk/implementationplan

See also covering letter:

Where are we now?

1. Is the analysis in the “where we are now” section accurate and complete? If not, what evidence supports your view?

i) The information presented is a useful indication of progress towards headline targets. However, a very serious omission is the lack of any analysis of the overall scale of requirement for the Region in resource terms. Nor is there an analysis of what resources have been secured and what the scale of the remaining delivery challenge may be. This is necessary both at the overall regional level and broken down by topic and by area.

ii) The plan is also thin on delivery, priorities and monitoring. We assume these aspects will be improved in response to the consultation responses.

iii) Linkages to RSS objectives are weak.

How do we get there – by theme?

2. Do you think the categorization of the current themes and sub-regional priorities adequately captures the ambitions of the regional and economic spatial strategies?

i) There is no recognition of the importance of the current Regional Spatial Strategy review and the need to reflect emerging longer term requirements up to 2031. Important opportunities may be missed if the focus is entirely on the shorter to medium term. Also the overall scale of the delivery challenge will not be apparent.

ii) There have been significant adverse impacts on plans for further education arising from the revision of LSC funding proposals for college development in the region including West Anglia College in Fenland and the Huntingdonshire Regional College. The EEiP needs to be updated

to reflect the importance of these proposals to social and economic objectives.

Housing

3a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) The order of priority amongst the numerous programmes listed in the plan does not emerge very clearly (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified.

ii) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities. References to EERA need to be qualified as the Assembly will not exist post March 2010. Where there are priority actions for local authorities this needs to be explicit.

iii) The programmes and priorities relate only to the current spatial and economic strategies and there will need to be a revision to the EEIP to provide building blocks to 2031, aligning it to the ongoing RSS Review.

iv) The Cambridge sub-regional housing board (CRHB, which includes 2 Suffolk districts of Forest Heath and St Edmundsbury) would add the following more detailed comments on the housing chapter:

- **Table 5:** suggest adding the Building Research Establishment and SmartLIFE to the list of “main delivery partners”.
- **Table 7:** Suggest tightening up the wording – is the Plan aiming to deliver larger sites, or are you aiming to deliver large mixed-use sites specifically?
- **Table 12;** This table puts a lot of emphasis on community land trusts, maybe needs expanding to broader rural issues as per the Taylor review, tying together economy and housing more closely to support and develop sustainable rural settlements. Suggest including rural community councils and rural housing enablers as delivery partners for this specific table.

3b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

- *Risk management systems – perhaps something could be added for the whole Plan, to help region bodies monitor where barriers arise, where “red” risks are flagged against sites of strategic importance – so that strategic partnerships use such a*

system and reflect headlines back to the region at specific times for specific purposes.

- *There is a lot of reference to section 106 agreements. Might it be wise to add reference to alternative systems including community infrastructure levy or tariff, to ensure the Plan remains relevant in the long term*

3c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) There is insufficient evidence to add or remove priorities. The resources required are not explicitly defined, nor is the funding identified. This is true for all the themes – so it is not clear whether or not the EEIP itself deliverable, irrespective of alternative priorities.

ii) Issues the Cambridge Sub-Region has prioritized, and which we would have expected to see in the Plan include:

- Ageing population and demographic change generally, and supported housing issues which need to be a clear priority.
- Promoting equality and diversity, specifically housing actions around BME communities, gypsies and travellers and migrant workers.
- Environmental impact of all homes - there is a table on energy efficiency in existing homes (table 13) which is important, but also need to over new homes and issues such as water and waste, not just energy.
- Decent homes and maximizing the use of empty homes, including private sector housing renewal and regeneration in specific locations.
- Prevent and tackle homelessness, help reduce deprivation and improve health and social inclusion, and extend housing options and housing choice.
- Linking rural housing to employment and economy as per the Taylor review (see comment on table 12 above).

Other suggested areas to include in the Plan:

- Community “soft” provision – at present there is much more emphasis on number of homes and of affordable homes to be delivered and less on community building and management. We would support more mention of this aspect of delivery in future
- Likewise, quality of housing is mentioned in the first paragraph, but thereafter the document appears to focus on numbers with no reference to maintaining quality. eg, 'What are the implications of not achieving the targets' paragraph should also include need to balance meeting targets with maintaining quality.
- Not sure why (on page 27) the Plan states that “a key priority is to bring together as a single consideration the delivery of H1 and

H2 housing policies in the RSS". Is it really crucial that these two targets are merged?

Transport

4a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) The programmes set out here are really a set of concepts rather than a set of schemes for implementation. The exception is the group of rail freight schemes which are fairly specific. The theme of "What are the key components of the programme?" in Table 14, focuses on demand management and achieving modal shift. However, the first sentence is too open ended as it could include providing more road space to encourage road traffic or in policy terms it could mean turning road space over to sustainable modes. We assume the latter is intended but this needs to be clarified.

ii) The order of priority for transport delivery does not emerge very clearly in this section (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified such as the A14 improvement as this is fundamental both to support economic prosperity and housing delivery.

iii) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities. References to EERA need to be qualified as the Assembly will not exist post March 2010.

4b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

i) Major Highways Agency and Local Authority schemes should be listed, at least those where commitment has been demonstrated by Central Government or the Region.

ii) The regional transport projects need to be aligned with local transport strategies, including encouraging sustainable transport at a local and regional level. The current plan risks ignoring the need for a shift to buses, cycling and walking. This section should be more closely joined up with CO2 reduction targets.

4c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) Reference is made in Table 15 (Long Term) to the options for (a) high speed line "through or benefiting the region". It is not clear whether this is intended to indicate support in principle for a high speed line or support merely for the exploration of options. There should be widespread consultation before any commitment is made either way. In any event it should not be suggested that a scheme which went through the region without providing any benefits to the Region could be supported.

Utilities

5a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) . The order of priority amongst the numerous programmes listed in the plan does not emerge very clearly (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified.

ii) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities.

iii) There should be clear references to the importance of utilities responding to the challenge of Climate Change. The new duties on Water Companies, Local Authorities, EA (proposed under the Pitt Review recommendations and the Floods and Water Management Bill) should be highlighted.

5b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

i) The programmes for water would benefit from giving greater consideration to the linkages between carbon emissions and the provision and treatment of water and providing a series of measures to address this. It is unclear from the programme descriptions how water companies are being engaged in the implementation plan process. It is also unclear why tables 33 & 34 are not included in the transport section.

5c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) There is insufficient evidence to add or remove priorities. The resources required are not explicitly defined, nor is the funding identified. This is true for all the themes – so it is not clear whether or

not the EEIP itself deliverable, irrespective of alternative priorities..

Enterprise, Business Support and Innovation

6a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) The stated programmes of activity do not recognise the need to change attitudes towards enterprise, entrepreneurship and innovation, starting with better support for enterprise education in schools

ii) There needs to be more recognition of the need to address worklessness through self employment, particularly given the impact of the recession on unemployment levels across the region.

iii) Business resource efficiency support is vital and should be focussed on priority, resource intensive sectors, yet there is little or no reference to this, or the need to support businesses in adapting to the opportunities and threats of climate

iv) The order of priority amongst the programmes listed in the plan does not emerge very clearly (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified.

v) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities.

6b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

i) The Hauser Forum will have many of the elements of a third generation science park and could potentially play a significant role in contributing to the delivery of the headline targets and ambitions of the RES and RSS.

ii) There is no mention of the potential role of public sector procurement in helping to build local supply chains, encourage local innovation and lead the way in implementing low carbon solutions. There may be potential for the London 2012 Olympic and Paralympic Games programme to be expanded to include public procurement more generally, looking at opportunities for intervention on both the commercial and public sector sides.

6c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) The role of the economy of market towns in the Region is inadequately recognized. Market towns are important hubs for wide rural catchments as well as contributing to overall prosperity. However they can be vulnerable to adverse economic conditions and need adequate support and investment if they are to thrive. If properly supported some market towns may be appropriate for sustainable urban extensions as recommended in the Taylor Report. More generally, the Plan makes little reference to the need to differentiate interventions to the needs and strengths of city, market town and rural economies.

ii) Financial support for business should be prioritized. However, this should recognise the need for finance to be available at different stages of growth, particularly at the mezzanine level to encourage growing businesses to stay in the area. Financial support should also be prioritised towards key growth sectors such as green tech, biotech and ICT.

iii) Third generation science parks will be key in attracting inward investment, encouraging local growth of companies and helping to build local supply chains

- o Enterprise hubs should not stand alone but be an element of third generation science parks.*
- o Innovation in key sectors should also be an element of third generation science parks. Science parks should focus on the pathway from R&D to development, prototype, manufacture, distribution and market, by encompassing academia and start ups through to large corporate companies.*

iv) Inward investment and international trade can play a very important part in supporting the growth of rural economies, such as in Fenland.

Skills and Employability

7a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) The programmes stated appear to mainly be extensions of what is already taking place. We question whether there is a sufficient step change, particularly given the changed economic climate. In addition, we question whether there has been an adequate evaluation of the effectiveness of the programmes being retained, given that with reduced future public sector funding some will need to be dropped

ii) There needs to be more emphasis on progression and particularly re-skilling, again, reflecting the impact of the recession on the region's

workforce, and the opportunity that exists to re-skill individuals to support the growth of key growth sectors.

iii) There needs to be a better understanding of skills gaps at a regional and local level and how these are best to be addressed. This should form an important building block for the implementation of further programmes in support of skills development.

iv) There needs to be more emphasis on health and care skills especially as this is a growing sector across the whole region.

v) There is inadequate focus on maximising the value from the research taking place throughout the region's universities by growing the business and management skills of academics and encouraging interaction between academics and business schools.

vi) In addition, there is inadequate reference to the need for technician level skills needed to support growth in key growth sectors such as biotech – this could potentially be included within 'Leadership and high level skills'.

vii) Secondary education does not feature as a topic in the Plan. Presumably this is because education is not subject to regional funding decisions. However it is a matter of regional significance. Many towns in the region have reached the capacity of current secondary school provision and future growth is likely to raise serious questions about the appropriate form of service development and the means of funding it.

viii) The order of priority amongst the programmes listed in the plan does not emerge very clearly (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified.

ix) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities.

7b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

i) Some areas have local employment and skills boards in place. An evaluation of the effectiveness of existing boards would be useful in informing future programmes of support.

ii) Smartlife is a key facility which is developing as a training hub and a franchise model for rolling out skills in modern methods of construction and renewables etc. within the region and elsewhere in the UK.

iii) The Hive (formerly known as ICE), led by Cambridgeshire County Council, should prove to be a further significant resource in developing sustainable construction skills and preparation for a low carbon economy with wider benefits across the Region. It is hoped that implementation will be confirmed shortly.

7c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) A demand-led skills system should be a high priority, however this needs to be backed up with reliable and comprehensive information on regional and local level skills gaps and skills provision. Could the skills for key sectors and clusters programme, be combined with the demand-led skills programme?

ii) Creating an environment for a thriving third sector will be essential with increasing pressures on public sector spending.

iii) Leadership and high-level skills will be important in encouraging businesses to grow locally and compete globally

iv) We support the lead being taken by LAAs on the integration of employment, skills and economic participation initiatives as deprivation, low skills and aspirations should be tackled at a local level. However, this lead needs to be adequately supported and enabled at the Regional level and in our view should feature as a key element of the EEIP.

Culture, Creativity and the Visitor Economy

8a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) There is no reference to the benefits and opportunities of linking green infrastructure with tourism opportunities.

ii) The order of priority amongst the programmes listed in the plan does not emerge very clearly (this is true across the themes). It would be helpful if the major strategic requirements for the region were identified.

iii) The identification of who is responsible for different aspects of delivery is often vague or shown by groups of organisations. The document should be more direct in assigning accountabilities.

8b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

i) The interventions described are very high-level and it is unclear how these ambitions will be translated into delivery. The sources of investment for these projects are uncertain. The programmes provide insufficient attention to the role of new sporting facilities and would benefit from greater consideration of how multiple cultural facilities could be delivered through the same project.

ii) East of England Tourism (EET) are already working closely with local authorities across the region to maximise and build upon existing assets and promotional opportunities. Additional resource to market the region more, could bring significant extra visitors to the region and should be flagged up in the EEIP.

8c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) Growing and sustaining the visitor economy should be prioritized, particularly given the importance of the tourism sector to market towns and rural areas.

ii) Promoting the region through culture is an important area of work where a significant amount can be achieved with a relatively small amount of funding. Given the limited funding available, the emphasis should be on supporting existing events and activities to maximise their potential.

iii) The items included under "Creative places and sustainable communities" should be identified as a key element of the overall strategy. Developing and maximising the role of new major cultural and sporting facilities is essential both to the economy and to the vibrancy of our communities. This theme would benefit from a more meaningful title e.g. "Creative places and sporting centres of excellence."

Green Infrastructure, Landscape, Heritage, Flood Risk and Coastal Environment

9a. Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

i) No – this theme and its programme are far too focused on Environment Agency related activity. The whole issue of new duties for the local authorities arising from the Pitt Review (and now included in the Floods and Water Management Bill) is missing. There is a massive funding gap here and resources for delivery have not been specified. There is no reference to the need to build in resilience and to provide emergency response and recovery. Also missing is the range of work required to adapt to the effects of Climate Change which is much more

than just about flooding (NI188) The impacts to be taken into account include increases in temperature, drought and extreme weather events. These could create risks and opportunities such as: impacts to transport infrastructure from melting roads or buckling rails, increased damage to buildings from storms, impacts on local ecosystems and biodiversity, scope to grow new crops, changing patterns of disease, impacts on planning requirements and the local economy and public health. Some of these are touched on in the introductory text but are not reflected in the programmes.

ii) The projects for Green infrastructure development are vague and lack a clear indication of ownership.

9b. Is there other existing or planned work that we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

No comments offered.

9c. Are there programmes that you would prioritise or remove? What are your reasons for this?

i) Yes - see answer to 9a

Any Gaps?

10. Are there any other programmes outside the themes that might be needed to successfully deliver the two regional strategies?

i) The draft EEIP document helpfully brings together key strands of delivery in the region for the first time. The range of major delivery programmes can be seen by topic and by area. There are useful indications of funding sources and issues remaining to be addressed.

However there are a number of significant shortcomings in the document as a strategic programming tool which are identified elsewhere in this response. A number of significant omissions can be identified as follows:

a) The recession and the expected shortage of public funding in the future is mentioned as a serious issue and some suggestions are made in relation to it. However, there is no clear strategy to deal with the recession as a major challenge to delivery in the Region (Partly this is because of the costs of implementing the plan and the funding sources are so vague in this document). It is vital that there is a fully developed strand in the Plan showing what measures need to be implemented to respond to the recession and assist in recovery especially bearing mind limitations on public funding. This

should be set within an overall approach which clarifies for example how far we should accept a slow down in delivery of development and whether we need to adjust our expectations in terms of early provision of infrastructure.

b) Secondary education does not feature as a topic in the Plan. Presumably this is because education is not subject to regional funding decisions. However it is a matter of regional significance. Many towns in the region have reached the capacity of current secondary school provision and future growth is likely to raise serious questions about the appropriate form of service development and the means of funding it.

c) There is inadequate attention to Climate Change Adaptation or new duties for local authorities arising from the Pitt Review are not even mentioned.

d) There is no mention of National Indicators or of linking regional implementation to the LAA programmes across the Region. This could provide a useful basis for prioritisation.

How do we get there – by Place?

11 a. Do the sub-regional priorities capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

Greater

Cambridge:

i) It is noted that the economic sub-region has been used as the boundary for Greater Cambridge. It should however be explained in the text that housing and employment target areas are different, as currently this is unclear. There should be stronger recognition of the Cambridgeshire Vision as set out in the Cambridgeshire Community Strategy (CCS), especially as table 75 contains only Cambridgeshire LAA targets. The emerging IDP covers Cambridgeshire, although it acknowledges the links to Greater Cambridge.

(Please note that Greater Cambridge includes North Hertfordshire, not East Hertfordshire as is currently stated in the EEIP. In addition the UEA project referred to should actually be Anglia Ruskin University):

ii) Given the importance of transport to the successful and sustainable growth of the Greater Cambridge area, Table 75 is especially disappointing, for not indicating the exemplary level of leadership being shown in the development of innovative transport policy, the current level of investment in infrastructure and the level of investment which still has to be secured..

iii) Overall in Cambridgeshire, the strong transport theme being pursued is quality of transport provision, i.e. improved buses and bus services with real time information and level boarding, quality Park and Ride, high quality Guided Busways and in the quality and design of cycling facilities. The objective is that these measures will lift the status of these modes in the public's perception and encourage their wider use.

iv) The A14 improvement is only mentioned in passing and its fundamental importance to the future economy and development of Greater Cambridge is not brought out.

v) the Plan does not recognise Fenland or other rural areas of Greater Cambridge and the important part they do, and could play in supporting the diversification of the local economy. Also it is not helpful that there is no significant infrastructure provision or other interventions identified for Fenland. It should be noted that the site of a potential " Inland Port" (a major rail based distribution centre) is partly in Fenland but is only listed in the Peterborough sub-region. More recently there have been suggestions by Association for Train Operating (ATOC) that a new passenger station and rail service could be provided at Wisbech.

vi) there is no reference to the particular need in Greater Cambridge to maximise and capture the value creation from the innovation that takes place in the area. Supporting and enabling local growth of businesses and support for hi-value manufacturing are key priorities in supporting this ambition.

vii) In setting the scene for the Cambridge area it would be helpful if attention was drawn to the Cambridgeshire Quality Charter for Growth which spells out the overall approach to sustainable development in the County. It includes key principles for Community, Connectivity, Climate and Character and is supported by the local authorities, Cambridgeshire Horizons, statutory agencies, utilities and major landowners and developers.

viii) it is not clear from the current EEIP how EEDA intends to engage with the sub regional priorities stated. It would be useful to see a more meaningful analysis of how sub regional priorities feed into or impact on the delivery of regional programmes and what gaps might exist and might need to be filled, between local level plans and regional ambitions.

ix) The EEIP will need updating by reference to the emerging Cambridgeshire Integrated Development Plan. (IDP)

11b. Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

Greater

Cambridge

i) the priority list makes no mention of the Cambridge Guided Busway. Although this is already close to completion it is a significant element of the sustainable sub-regional infrastructure and will be considered for future extension, for example to improve access to Cambridge Station or to link to the development of Cambridge East.

ii) Other transport requirements should be included in Table 75 as follows:

-Chesterton Station (CCC) - The proposed development of Chesterton rail station is given no mention despite the fact that this is a top priority project for which funding confirmation is currently awaited. The station ought to be included in sub-regional priorities under 'Address the major transport infrastructure deficit'.

- the draft EEIP does not mention the Ely Southern Bypass or key issues around improving access at the level crossing in Ely, crucial for future of the area. Ely Southern Bypass has now become a priority due to the planned increase in use of the Felixstowe to Peterborough line by freight as well as to local development), (CCC).

-The Highways Agency is examining the need for widening of the M11 around Cambridge due to the growth agenda. (HA)

- Rail links are crucial to the Cambridgeshire economy, there needs to be reference to the scheduled longer trains, longer platforms and the provision of the island platform at Cambridge Station as measures to improve links to London. Cross country links need to be improved. (Network Rail and wider Rail Industry).

- Cambridge Cycling Demonstration Town which is investing about £3.6m matched funding by 2011 to enhance cycle facilities and encourage even greater cycle use (CCC and Districts).

iii) while the investigation of a variable rate tariff as a means of assisting delivery of major infrastructure is mentioned in the supporting text of the document, it is not listed as a sub-regional priority. This will be a vital tool in helping to secure necessary developer funding for infrastructure.

iv) the priorities include the important sub-regional proposals for college development but this reference will need to be updated in the light of the revision of funding arrangements being undertaken by the Learning and Skills Council (Affects West Anglia College in March and Huntingdonshire Regional College in Huntingdon).

v) The 'Deepen the local and regional impact of universities and regional colleges' section does not currently mention the University of

Cambridge. The North West Cambridge development should be included here, as this will expand University capacity.

vi) reference should be made to the ongoing partnership work with East of England tourism, and the importance of the tourism industry as a significant source of employment across the Greater Cambridge area.

vii) inadequate reference is made to the internationally significant horse racing cluster at Newmarket, and the need to build on and support this cluster to bring local and regional economic benefits.

viii) reference should be made to the proposal for The Hive (formerly ICE) which will assist substantially in improving the capacity for sustainable construction in the sub-region and beyond (we have also made reference to the Hive and also SmartLIFE in our comments on Chapter 7 as significant benefits can be rolled out to the wider region – their significance should not be underplayed);

ix) There is no reference to the importance of infrastructure and other changes required to adapt and respond to Climate Change in the Greater Cambridge area (e.g. requirements arising from Pitt Review).

x) The 'Green infrastructure improvements' section should mention the Green Infrastructure Strategy.

xi) improving air quality in Cambridge should be considered as a sub-regional priority;

11c. Are there priorities that you would prioritise or remove? What are your reasons for this?

i) In relation to Greater Cambridge more work is needed on clarifying the scale of the delivery challenge in the Sub Region, the most significant strategic challenges and the investments still to be secured. The local authorities, working with Cambridgeshire Horizons, are preparing the Integrated Development Plan for Cambridgeshire which will provide more input to the EEIP. Addressing the infrastructure deficit in Greater Cambridge will have wider benefit by unlocking the potential of a major engine of growth in the region.

12. Do you have any comments about the proposed governance and monitoring mechanisms set out in the implementation plan?

i) The monitoring progress section is unclear. Figure 19 is confusing, and suggests a resource- and time-heavy process. We question the value of attempting to annually monitor 'leverage' and 'synergy'.

ii) Figure 20 does not adequately explain how monitoring of the

Implementation Plan will relate to existing arrangements for monitoring the RES and RSS.

13. Do you have any views on the presentation of the final Implementation Plan in terms of its length, structure or design?

i) Given the length of the document, hyperlinks in the contents page to the various chapters would be very helpful. Parts of the plan could be better expressed in plain English, for instance 'An Integrated Employment, Skills and Economic Participation Offer' and 'Regional Resource Efficiency Promotion'.

ii) The Plan does not clarify borders or sub-regions, with the section "by place" following the EEDA key centres of development and change. Two of these areas cover our housing sub-region: Greater Cambridge and North/West Norfolk and West West Suffolk. In the final Plan it would be good if data and targets are broken down into districts across the region to ensure we are all clear on our individual targets, regardless of the areas and sub-regions identified in the above. It would be helpful if the Plan includes some reference to the different areas at work across the region e.g. counties, planning sub-regions, housing sub-reigons, KCDCs etc.

Do you have any comments on the Climate Change Action Plan document?

i) This is currently not an action plan. The document provides a high-level review of national and regional climate change concerns and identifies a number of key themes for addressing climate change, however the document does not contain clear actions, timescales, milestones or owners – requisite features of any action plan. In its current state therefore it is very difficult to provide comments when there is little substantial material to comment on.