



Department for
Communities and
Local Government

Strategic Environmental Assessment of the Revocation of the East of England Regional Strategy

Post Adoption Statement

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Summary of Key Facts

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Preface

This document is the Post Adoption Statement for the revocation of the Regional Strategy for the East of England. The Post Adoption Statement is a requirement¹ of the Strategic Environmental Assessment process to which the Plan to Revoke the Regional Strategy has been subject. Strategic Environmental Assessment is an assessment process that supports decision making by identifying, characterising and evaluating the likely significant effects of a plan or programme on the environment and determining how any adverse effects may be mitigated or where any beneficial effects may be enhanced.

The Regional Strategy being revoked comprises the East of England Regional Spatial Strategy published by the then Secretary of State in 2008 and any policies contained in revisions² to it, and the East of England Regional Economic Strategy published by the East of England Development Agency in 2008.

The Post Adoption Statement is being published in parallel with the laying of Order 2012 No. 3046 (The Regional Strategy for the East of England (Revocation) Order 2012) revoking the Regional Strategy³, which will come into force on 3 January 2013.

¹ Article 9 of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and Part 4 (regulation 16) of The Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633).

² Accommodation for Gypsy and Travellers and Travelling Show People in the East of England (A Revision to the Regional Spatial Strategy for the East of England) 29 July 2009, Thurrock Key Centre for Development for Change (A Revision to the Regional Spatial Strategy for the East of England) January 2010, and revisions made to the Regional Spatial Strategy to insert the relevant parts of the 2005 Milton Keynes and South Midlands Strategy.

³ The Order also revokes all directions preserving policies contained in saved structure plans in the area to which the Regional Strategy relates.

Chapter 1

Introduction

1.1 Regional Strategies

The policy to abolish regional strategies fits into the Government's overall public commitment to deliver a fundamental shift of power from Westminster. For planning, this has meant radically reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live. The policy to revoke regional strategies is a key element of the Government's decentralisation agenda.

The Coalition Agreement makes clear the Government's priority to promote decentralisation and democratic engagement and to end the era of top-down government by giving new powers to local councils, communities, neighbourhoods and individuals. Regional strategies imposed development upon local communities; the Government wants to return decision-making powers on housing and planning to local councils.

Currently, the East of England Regional Strategy provides the statutory regional framework for development and investment across the region, including setting targets for housing delivery that apply to constituent local councils.

Since their creation by the Planning and Compulsory Purchase Act 2004, regional strategies, sitting alongside local plans prepared by local authorities, form the statutory development plan for an area. This means that the East of England Regional Strategy sets the framework for local plan-making and local councils in the region must ensure that their local plan is in general conformity with the Strategy at the time their local plan is submitted for examination. It also means that planning applications should be determined in accordance with the development plan (which includes the relevant regional strategy in the local planning authority's region) unless material considerations indicate otherwise.

In order to localise the planning system, section 109 of the Localism Act provides for the abolition of the regional planning tier as a two-stage process. The first stage, to remove the framework of regional planning, took effect when the Act received Royal Assent on 15 November 2011. This prevents further regional strategies from being created or revised. Section 109 also removed the responsible regional authorities. The second stage is the proposal to abolish each of the existing regional strategies outside London by secondary legislation, subject to the outcomes of the environmental assessment process.

The revocation of the East of England Regional Strategy would leave a more localist planning system comprising of local and where adopted neighbourhood plans and give local councils responsibility for strategic planning. It makes the local plan the keystone of the planning system, becoming the vehicle for strategic planning and the framework for neighbourhood plans.

On revocation of the East of England Regional Strategy (and any saved structure plan policies), the statutory development plan would comprise any saved local plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act.

In developing local plans, local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State:

- The **National Planning Policy Framework** was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment.
- The **planning policy for traveller sites** which was published in March 2012.
- The **planning policy statement 10: Planning for Sustainable Waste Management (PPS10)** until it is replaced with the national waste planning policy, to be published as part of the National Waste Management Plan for England.

In addition, local councils will need to comply with existing national and European legislation in preparing their plans. Importantly, councils also need to comply with the duty to co-operate introduced in section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by the Localism Act 2011) in order for their plan to be found sound at examination.

1.2 The Plan to Revoke the East of England Regional Strategy

The East of England Regional Strategy combines the contents of the East of England Regional Spatial Strategy (and any policies contained in revisions to the Regional Spatial Strategy⁴) and the East of England Regional Economic Strategy.

The East of England Regional Spatial Strategy (published as the East of England Plan in 2008) was introduced under the PCPA 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the region for 15 to 20 years. It requires local planning authorities to provide at least 508,000 net additional dwellings over the period 2001 to 2021. It includes policies to address housing, environmental protection, transport and other infrastructure, economic development, agriculture, minerals, energy and waste, as well as sub-regional policies. The key ambition of the East of England Plan was to allow the region to accommodate higher levels of growth in sustainable ways by focusing development at the region's cities and other significant urban areas, including some market towns.

The East of England Regional Economic Strategy (RES), published in Autumn 2008, was produced in compliance with the Section 7 of the Regional Development Act 1998. It provides a vision for the East of England economy to 2031. This includes the aspiration that the East of England regional economy will be internationally competitive with a global reputation for innovation and business growth, providing opportunity for all and will be at the forefront of low-carbon and resource-efficient development. The Regional Economic Strategy sets headline regional ambitions (with targets) requiring co-ordinated action of local, regional and national partners to ensure the East of England improves both its economic and environmental performance while addressing inequality. These targets cover productivity and prosperity; employment; skills; inequality; greenhouse gases; and water resources.

Revocation of the East of England Regional Strategy (and the 46 saved structure plan policies) would leave the statutory development plan as comprising of any saved local plan policies and adopted development plan documents. Approximately half the 47 local planning authorities in the East of England have adopted development plan documents under the Planning and Compulsory Purchase Act 2004. The remaining 23 local planning authorities in the East of England, who were yet to adopt a development plan document under the Planning and Compulsory Purchase Act 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the

⁴ Accommodation for Gypsy and Travellers and Travelling Show People in the East of England (A Revision to the Regional Spatial Strategy for the East of England) 29 July 2009, Thurrock Key Centre for Development for Change (A Revision to the Regional Spatial Strategy for the East of England) January 2010, and revisions made to the RSS to insert the relevant parts of the 2005 Milton Keynes and South Midlands Strategy.

Town and Country Planning Act 1990. These authorities are more likely to be affected by the revocation of the Regional Strategy.

Once the regional strategy is revoked, local councils should, in line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, and in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, approve development that accords with the local plan unless material considerations indicate otherwise. Where that plan is out of date, councils must, unless material considerations indicate otherwise, grant planning permission for development that is sustainable without delay. Out of date local plans will leave councils vulnerable to speculative development; the Government is encouraging local councils to put in place local plans as soon as possible.

In the absence of the East of England Regional Strategy, strategic and cross authority working will be driven by local councils who must now show the leadership required to work across boundaries to plan for strategic matters. The new duty to co-operate requires local councils and other public bodies to work together actively constructively and on an ongoing basis when planning for strategic matters in local and marine plans. This might involve both formal arrangements, such as joint plan-making or joint working partnerships, and less formal processes of close and ongoing dialogue to work through planning for strategic matters.

In the East of England region, there are already good examples of joint working through a variety of legislative and non statutory means.

- In **Norfolk**, Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council formed the Greater Norwich Partnership in recognition of the fact that the city of Norwich and its hinterland have issues in common. Using the powers in the Planning and Compulsory Purchase Act 2004, a joint core strategy was adopted in March 2011 (Note: part of the strategy has recently been put back to pre-submission stage as a result of a legal challenge).
- The **Essex** councils are producing an integrated strategy focused on the direction of their future economy. This defines priorities, identifies the area's assets, and agrees where resources should be applied.
- **Northstowe in Cambridgeshire.** In Northstowe, Cambridgeshire, South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Communities Agency and developers to deliver a new town, comprising a sustainable community for 25,000 people.

In addition, there are non-statutory Local Enterprise Partnerships (of which there are four in the region). This combination of measures aims to ensure that strategic planning operates effectively in the absence of the Regional Strategies.

1.3 Applying Strategic Environmental Assessment to the Revocation of the Regional Strategies

The Plan for the purposes of the Strategic Environmental Assessment is the Plan is to Revoke the East of England Regional Strategy (the East of England Plan and Regional Economic Strategy) and to leave in place a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth. The Plan to Revoke is set out in more detail in Section 2 of the Environmental Report published in July 2012.

As part of its stated commitment to protecting the environment, the Government initially carried out environmental assessments of the revocation of the Regional Strategies. These first assessments were undertaken to be compliant with the procedure set out in the Strategic Environmental Assessment Directive. A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework and a planning policy on Travellers sites, and has commenced the duty to co-operate provided for in the Localism Act. In addition, in a judgement by the Court of Justice of the European Union in the case of *Bruxelles*, the Court held that ‘..in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment’. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent case law, to update and build on the assessments which were described in the previous Environmental Reports.

AMEC Environment and Infrastructure Ltd were commissioned to carry out the further assessment and to prepare updated Environmental Reports. A public consultation exercise undertaken on the updated Environmental Report for the East of England ran from 25 July 2012 until 20 September 2012. Updating of, and consultation on, the Environmental Reports for the other seven regions has been staggered. The East of England Regional Strategy is the first of the eight to have completed consultation on the Environmental Report. This has enabled the Secretary of State to understand the environmental effects of revoking the regional strategy and to consider the views of the statutory bodies and the public who responded to two public consultations.

In accordance with Article 8 of the Strategic Environmental Assessment Directive, the Government has taken into account findings of the two

Environmental Reports (on the revocation of the Regional Strategy and the reasonable alternatives assessed as part of that process) and the consultation responses to those reports in coming to its decision to revoke the Regional Strategy.

1.4 Purpose of the Post Adoption Statement

Article 9 of the Strategic Environmental Assessment Directive requires that when a plan or programme is adopted (in this case, the Plan to Revoke the Regional Strategy), the consultation bodies, the public and any other Member States consulted on the Environmental Report are informed and the following specific information is made available:

- the plan as adopted;
- a statement summarising:
 - (i) how environmental considerations have been integrated into the Plan to Revoke the East of England Regional Strategy;
 - (ii) how the Environmental Report has been taken into account;
 - (iii) how opinions expressed in response to the consultation on the Environmental Report have been taken into account;
 - (iv) the reasons for choosing the Plan to Revoke the East of England Regional Strategy, as adopted, in the light of the other reasonable alternatives dealt with; and
 - (v) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the East of England Regional Strategy.

The purpose of this Post Adoption Statement is to provide the specific information outlined under each of the points listed (i) to (v) above and which is presented in the following sections of this statement.

Chapter 2

How environmental considerations have been integrated into the plan

2.1 Environmental Considerations in the Plan to Revoke the East of England Regional Strategy

Environmental considerations have been integral to the Plan to Revoke the East of England Regional Strategy. Policy changes developed alongside the Plan to Revoke provide protections in the context of revocation. For example, within the National Planning Policy Framework, sustainable development is described as a 'golden thread' running through both plan making and decision making. The National Planning Policy Framework makes clear that the planning system should contribute to and enhance the natural environment, including by protecting and enhancing valued landscapes, minimising impacts on biodiversity and providing net gains in biodiversity where possible. The Framework underlines that pursuing sustainable development means moving from a net loss of biodiversity to achieving net gains for nature. During its development, the National Planning Policy Framework was also subject to consultation, with many of the responses focusing on aspects of environmental protection and enhancement.

Environmental considerations are also key to other ongoing regional planning processes identified in the region. For example, water companies and their respective Water Resource Management Plans which set out how future demand for water resources will be met. Similarly, River Basin Management Plans for the region identify the pressures that the water environment faces and include action plans requiring cross boundary co-operation and input from a range of organisations. The duty to co-operate came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters.

The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely planned, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues.

2.2 Environmental Considerations in the Strategic Environmental Assessment

To provide the context for the assessment, and in compliance with the Strategic Environmental Assessment Directive, the relevant aspects of the current state of the environment and its evolution without the Plan to Revoke were considered, along with the environmental characteristics likely to be significantly affected. Key environmental considerations identified from this process included:

- historical reductions in biodiversity and natural/semi-natural habitats, particularly wetland habitats, and habitat fragmentation: Some natural habitats have declined over the years due to agriculture (reduced farmland and woodland bird species), although increased development and recreational pressure has also had an adverse effect;
- issues associated with population increase: The population of the East of England has grown at a faster rate than all the other English regions and is forecast to grow by 10% by 2020, reaching a total of 6.4 million. Population growth will be accompanied by changing age-structure and the age group expected to grow most in size is expected to be persons aged 65 or over. Housing completions have failed to keep pace with housing demand. Housing affordability ratios in almost all districts exceed the England average;
- poor rural service provision: Access to services in rural areas is lower than the UK average. Community vibrancy for less populated areas is low;
- imbalance between water demand and supply: availability of groundwater or surface water resources to meet future demands. Some existing areas already exceed sustainable abstraction limits;
- air quality, especially on main transport routes: The region has 66 declared air quality management areas. Road traffic is the principal source of pollutants, with some emissions also from industrial sources and intensive livestock units;
- flooding and climate change: 400,000 properties are at risk of flooding from either rivers or the sea; parts of the historic environment are also under threat from river flooding and coastal erosion;
- high car dependency; strains on public transport infrastructure: Levels of travel are high in the East of England; 69 per cent of all journeys are made by car. High car ownership and use have led to areas of congestion;

- increasing trend towards air travel: Luton and Stansted airports have grown rapidly and are reaching their capacity;
- waste: inert, hazardous and non-hazardous waste totals approximately 12 million tonnes for the region. Approximately 3.2 million tonnes of the 12 million is household waste. Of the total household waste, 1.6 million tonnes was sent to landfill (40% lower than in 2001 and 9% lower than 2008/9), and 1.5 million tonnes was recycled, reused or composted. Including. The region is a net importer of waste (particularly from London). Since the introduction of the European Landfill Directive in 2004, the management of hazardous waste has become a significant issue for the region;
- erosion of historic assets: Major development, bypasses and insensitive developments have resulted in a loss of historical assets;
- pressures on landscape character.

These factors were then reflected in the range of topics that were considered in detail by the Strategic Environmental Assessment, as are outlined in **Table 2.1**.

Table 2.1 Environmental topics which were considered in the Strategic Environmental Assessment

Topics included in the Strategic Environmental Assessment of the revocation of regional strategies
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)
Population (including socio-economic effects and accessibility)
Human Health
Soil and Geology (including land use, important geological sites, and the contamination of soils)
Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)
Air Quality
Climate Change (including greenhouse gas emissions, predicted effects of climate change such as flooding and the ability to adapt)
Waste Management and Minerals
Cultural Heritage (including architectural and archaeological heritage)

Topics included in the Strategic Environmental Assessment of the revocation of regional strategies

Landscape and Townscape

All the environmental topics listed in the Strategic Environmental Assessment Directive and Regulations were found to be relevant for the assessment of the revocation plan.

In line with the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the Strategic Environmental Assessment Directive, the assessment process predicted the significant environmental effects of the Plan to Revoke the East of England Regional Strategy against all of the topic areas listed in **Table 2.1**. This was done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information was not available, the assessment was based on professional judgement and with reference to relevant legislation, regulations and policy.

Where it was identified that revocation of a Regional Strategy policy would have an effect on the environment and that this would have a consequence for Local Plan policies and/or local areas, the assessment examined those effects in more detail. Comparisons were made between the policies in the East of England Plan on housing allocations, allocations of pitches for gypsies, travellers and travelling showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment and policies on the Cambridge green belt and the heritage environment with the equivalent policies in local plans and /or core strategies in the region. This analysis was set out in Appendix C of the Environmental Report and was reflected, where relevant in the assessment of individual plan policies in Appendix D of the Environmental Report.

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted for a period of five weeks on the scope and level of detail to be included in the Environmental Reports in May 2011. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries.

Both Environmental Reports (issued in October 2011 and in July 2012) documented the findings of the assessment, outlining where any likely significant effects were identified and proposing where appropriate mitigation measures. These findings have then been taken into account during the

preparation of the Plan to Revoke and before the final decision was taken to adopt the Plan.

Chapter 3

How the Environmental Reports have been taken into account

The Environmental Reports and Plan to Revoke the East of England Regional Strategy have developed in tandem. **Table 4.1** details key stages of the Strategic Environmental Assessment and its relationship with the development of the Plan to Revoke the Regional Strategy.

Table 3.1 Key stages in the development of the Environmental Report and its relationship with the Plan to Revoke the Regional Strategy

Strategic Environmental Assessment	Plan to Revoke	Relationship
Scoping		
The scoping stage of the Strategic Environmental Assessment identified other relevant plans, programmes and environmental protection objectives which could be affected by, or which could affect the Plan to Revoke the Regional Strategy.	The development of the National Planning Policy Framework and its adoption in March 2012 removed the need to reference the planning policy statements (listed in Annex 3 of the National Planning Policy Framework, 'Documents replaced by this Framework')	The links between the other relevant plans, programmes, policies and strategies that were applicable to the Plan to Revoke were outlined. These included plans and programmes at an international, European or national level covering a variety of topics (including spatial and resource planning).
Assessment		
Initial assessment of the impact of revocation of the regional strategies undertaken before the National Planning Policy Framework was	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the	Assumptions that underpin the National Planning Policy Framework are clarified in the updated assessment,

adopted resulting in assumptions over the final contents of the National Planning Policy Framework and its influence.	Environmental Report takes account of the policies set out in the Framework.	documented in the updated Environmental Report (published in July 2012).
Initial assessment of the impact of the duty to co-operate took place prior to the commencement of the new duty and required outline of assumptions with regard to operation.	The provisions which create a new duty to co-operate were commenced when the Localism Act received Royal Assent on the 15th November 2011. They require local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.	Commencement of the duty to co-operate provided greater certainty to the assessment, reflected in updated assessment, documented in the updated Environmental Report (published in July 2012).
Assessment considered the effects of revocation on local planning authorities and provided analysis of local plans highlighting where plans were out of date or silent on key planning policy matters.	The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'.	The Strategic Environmental Assessment provided up to date summary of current position on the adoption and status of local plans, with indication of the number of authorities who needed to take action within each region regarding the revision and update of local plan policies.

Reporting

The key findings of the Environmental Report are presented along with the Government's responses in Table 4.2 below. The extent to which the findings have informed the final Plan to Revoke is detailed in section 6 of this PAS.

Consultation

The consultation responses to the consultation on the first and updated Environmental Reports are presented along with the Government's responses in Tables 5.1 and 5.2 in the following section. The extent to which the consultation has informed the final Plan to Revoke is detailed in section 6 of this PAS.

Monitoring		
Proposals for monitoring	Section 5 'Put Communities in charge of planning' of the Department for Communities and Local Government business plan 2012 – 2015 includes specific monitoring actions for the Department regarding the local plan making progress by authorities and on compliance with the duty to co-operate.	The Department for Communities and Local Government is able to jointly meet requirements for monitoring environmental effects of the implementation of the Plan to Revoke with business plan commitments and by undertaking periodic review of data for specific monitoring information.

Key findings of the Environmental Report are summarised in **Table 3.2** together with the Government response and how these have been taken into account in the Plan to Revoke.

Table 3.2 Key findings of the Environmental Report

No	Key Environmental Report findings	Response
1.	There will be significant positive environmental effects from the revocation of the East of England Regional Strategy, although these will be largely similar to those if the Regional Strategy were retained.	The Government notes the findings of the Environmental Report and considers that the Plan to Revoke is largely positive in its effect although it is acknowledged that these are largely similar to those of retention.
2.	The only area where revocation of the Regional Strategy would lead to significant negative effects is in relation to water resources arising from development associated with policies for housing and employment provision.	The Government notes this effect and that it is similar to that for retention. It agrees that the measures presented to mitigate the effects, which concern statutory actions by water companies (such as requirements under Section 37A of the Water Industry Act 1991 to prepare and maintain water resource management plans), the Environment Agency and local authorities (under the duty to co-operate) will be effective in the sustainable water resource

No	Key Environmental Report findings	Response
		management for the region.
3.	<p>For revocation, there may be more uncertainty about the nature and scale of positive and negative impacts on the Strategic Environmental Assessment topics in the short and medium term due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities</p>	<p>The Government notes the findings of the Environmental Report. The Plan to Revoke gives clarity about the status of the Regional Strategy which will reduce uncertainty about the policy framework and potential uncertainties and delays to Local Plan-making. Government notes the findings of the Environmental Report on progress of plan-making in the East of England.</p> <p>In noting the findings of the Environmental Report, the Government considers uncertainty of impacts until plans are in place are mitigated by measures outside the Plan to Revoke</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will cease to apply. From March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may</p>

No	Key Environmental Report findings	Response
		<p>be given.</p> <p>Delivery of plans is increasing: – across the East of England region 6 councils have adopted Local Plans since May 2011, compared with 19 councils that had adopted local plans over the previous 7 years. 52% of councils have a plan adopted post-2004. And overall 68% of councils now have a published plan.</p> <p>There is a package of advice and support being offered to all councils, from the Local Government Association (LGA), the Planning Inspectorate and the Department, to support councils get local plans updated or in place. The Planning Inspectorate is working in particular with authorities with published plans about to be examined, and the LGA’s Planning Advisory Service is offering support to councils working towards plan publication. The Inspectorate continues to work quickly to examine plans already submitted, and the focus now is on maintaining a strong pipeline of plans coming through for examination.</p> <p>Furthermore, the Government has already introduced, or is introducing, a range of measures to make the planning system work more effectively and efficiently. These measures are designed to create the conditions that support local economic growth, increase building and remove barriers that stop local businesses creating job. Specific measures build on the measures in the Localism Act and the introduction of the National Planning Policy Framework and include:</p> <ul style="list-style-type: none"> • proposals to extend permitted development rights for a trial period of 3 years; • instructing the Planning Inspectorate to respond quickly to all major economic and housing-related appeals • proposals to speed up the process for determining planning appeals • giving developers extra time to get their

No	Key Environmental Report findings	Response
		<ul style="list-style-type: none"> through the Growth and Infrastructure Bill, giving new powers to the Planning Inspectorate to take over the role of making planning decisions in an area if the local authority has a record of consistently slow or poor quality decisions
4.	<p>The effects of revocation of policies which provide strategic direction whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites will be more uncertain until all participating local authorities define and agree areas of co-operation and implement the duty to co-operate and then reflect them in their adopted plans.</p>	<p>The Government notes the findings of the Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that the uncertain nature of the effects are mitigated by measures outside the Plan to Revoke</p> <p>The statutory duty to co-operate, set out in the Planning and Compulsory Purchase Act 2004 inserted into the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues, including those set out in paragraph 156 of the Framework (homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape) and taking account of paragraph 160. Local</p>

No	Key Environmental Report findings	Response
		<p>Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the duty to co-operate in preparing the development plan.</p> <p>The duty to co-operate reflects the Government’s broader approach to locally-driven cooperation to address the challenges of growth, including the strategic role played by Local Enterprise Partnerships. There are four Local Enterprise Partnerships in the East of England region, covering Norfolk and Suffolk; Greater Cambridge and Greater Peterborough; Hertfordshire and the south-east including Greater Essex, Kent and East Sussex. Their remit is to drive growth across their area making the most of its inherent strengths.</p> <p>For example, in 2011 the New Anglia Local Enterprise Partnership established Enterprise Zones for the coastal towns of Great Yarmouth and Lowestoft, to foster green economic growth. To simplify the planning framework in line with the Enterprise Zone requirements, Local Development Orders have been introduced. This enhances permitted development rights for Energy, Offshore Engineering and Ports & Logistics businesses. Coastal flood risk is a challenge for both towns, exacerbated by climate change related sea level rise. Other environmental issues include sensitive aquifers and contaminated land. All seven Local Development Orders sites are on principal aquifers and one is wholly within a source protection zone (SPZ1). Partnership working between the Environment Agency and the four local authorities involved - Waveney District Council; Great Yarmouth Borough Council; Norfolk County Council and Suffolk County Council - has helped them to jointly agree all seven individual Local Development Orders, and address environmental issues, in particular flood risk, in a strategic but flexible way.</p> <p>There are other examples of partnership</p>

No	Key Environmental Report findings	Response
		<p>working in the region. For example in Norfolk, Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council formed the Greater Norwich Partnership in recognition of the fact that the city of Norwich and its hinterland have issues in common. Managed by the Greater Norwich Partnership, a joint core strategy was adopted in March 2011 (although part of the strategy has recently been put back to pre-submission stage as a result of a legal challenge). The approach adopted by the Greater Norwich Partnership is based on agreement about the need for growth (Growth Point Status). The Essex councils are producing an integrated strategy focused on the direction of their future economy. This defines priorities, identifies the area's assets, and agrees where resources should be applied.</p>
5.	<p>Whilst the duty to co-operate could well address a wide range of strategic issues, there is uncertainty as to how this might work both by topic and geographically. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p>	<p>The Government notes the findings of the Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the Plan to Revoke</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 Act inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The National Planning Policy Framework makes clear cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156. These matters include climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The duty to co-operate not only means that authorities are required to work collaboratively when</p>

No	Key Environmental Report findings	Response
		<p>developing their local plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>The National Planning Policy Framework sets out a set of core land use planning principles which should underpin both plan-making and decision-taking – including encouraging the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the statutory duty to co-operate. These include the requirements for local authorities to have a positive strategy to promote energy from renewable sources; design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily; approve applications for renewable energy if the impacts are (or can be made acceptable); and co-operate to deliver strategic outcomes which include mitigating climate change. The National Planning Policy Framework’s proactive, plan-led approach sits within a wider set of requirements and policy initiatives to deliver renewable energy. These include the UK’s legally binding target that by 2020 15% of energy should come from renewable energy. Additionally, there is a specific duty on Local Planning Authorities to ensure their local plan includes policies designed to mitigate climate change.’ The National Planning Policy Framework also makes clear that, to minimise impacts on biodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority boundaries.</p> <p>Existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water</p>

No	Key Environmental Report findings	Response
		<p>Management Act 2010 – which includes a duty to co-operate) remains. Local Planning Authorities are required by the National Planning Policy Framework to undertake a Strategic Flood Risk Assessment, preferably at a catchments level through joint co-operation – there are examples of joint working on Strategic Flood Risk Assessments throughout England (e.g. Cambridge/South Cambridgeshire, Partnership for Urban Southampton).</p> <p>Six Energy National Policy Statements (including one on nationally significant renewable energy infrastructure) set out the need for certain infrastructure and policies against which applications for development consent for energy projects will be considered. These documents include the requirements for applicants to address economic, social and environmental impacts of a scheme; they also enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted.</p> <p>Existing policy arrangements are in also place on a number of issues, for example the Aggregates Working Party for the East of England which aims to provide a steady and reliable flow of minerals. Similarly waste authorities work together to plan strategically for waste management.</p> <p>Nature Improvement Areas provide cross-boundary projects where partners' work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The initial 12 NIAs include the Nene Valley and Greater Thames Marshes.</p> <p>The Green Infrastructure Strategy for Cambridgeshire aims to improve understanding on benefits of a planned co-ordinated approach to green infrastructure amongst regional partners, and highlight positive achievements. It is a partnership between Cambridge Horizons, the County Council, local authorities, relevant regional and national bodies, and local nature and</p>

No	Key Environmental Report findings	Response
		<p>conservation charities and organisations. Faced with the challenge of providing at least 73,000 homes in the next 20 years, the Cambridgeshire green infrastructure strategy was launched in 2006 to lead the way in achieving sustainable housing growth. To embed non-statutory green infrastructure into the planning process, the strategy is being delivered in partnership with the Housing Growth Fund and individual partners.</p> <p>Reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live is part of the Government's broader approach set out in, for example, 'Enabling the transition to a green economy', and the Government's 'Biodiversity 2020' strategy, and in the context of statutory requirements. Strategic partnerships, including Local Nature Partnerships, Climate Local, and the new arrangements for Lead Local Flood Authorities, are examples of how co-operation is already a key part of the wider framework addressing the issues raised.</p>
6.	<p>In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create or exacerbate socio-economic</p>	<p>The Government notes the findings of the Environmental Report.</p> <p>Section 2.4 of the Environmental Report makes clear that Regional Strategies have not led to the expected level of plan provision for housing. Regional Strategies set housing targets on the basis that these would be incorporated into plans by local authorities, and that the market would deliver them. But only 46% of local planning authorities have adopted a local plan (Core Strategy) under the Planning and Compulsory Purchase Act 2004. There has been significant opposition to regional strategy housing targets and other issues, for example in the East of England 21,500 representations were made on the draft Regional Spatial Strategy, 78% of which were objections.</p> <p>In noting the findings of the Environmental</p>

No	Key Environmental Report findings	Response
	<p>disparities (reflected in the Strategic Environmental Assessment as effects on the population and health topics) which are difficult to reconcile without significant interventions.</p>	<p>Report, the Government considers that the effects on the population and health Strategic Environmental Assessment topics are mitigated by measures outside the Plan to Revoke.</p> <p>The National Planning Policy Framework asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework. They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>The New Homes Bonus (NHB) is a powerful and permanent incentive for local authorities and communities to increase their aspirations for housing growth. NHB is based on the additional council tax raised - using the national average in each band - for additional homes (new builds and conversions) and long term empty properties brought back into use.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>One example of co-operation is that</p>

No	Key Environmental Report findings	Response
		<p>Northstowe, Cambridgeshire, South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency and developers to deliver a new town, comprising a sustainable community for 25,000 people. The Essex councils are producing an integrated strategy focused on the direction of their future economy. This defines priorities, identifies the area's assets, and agrees where resources should be applied.</p>
7.	<p>In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets (such as increased demand for travel, waste management facilities and water resources and the effects from land take and disturbance on biodiversity and landscapes).</p>	<p>The Government notes the findings of the Environmental Report and judgements made on the potential wider effects. However these judgements do not provide evidence of broader drivers of spatial change, the socio-economic consequences and regional economic circumstances.</p> <p>The Government has introduced broader policy measures outside of the Plan to Revoke, for example, the New Homes Bonus is designed to ensure that communities which are growing can mitigate the strain of increased housing and respond to community ambitions, for example by providing local services, unlocking infrastructure and community facilities. This is in the context of broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>Regional Strategies set housing targets on the basis that these would be incorporated into plans by local authorities, and that the market would deliver them. But only 46% of local planning authorities have adopted a local plan (Core Strategy) under the Planning and Compulsory Purchase Act 2004. There has been significant opposition to regional strategy housing targets and other issues, for example in the East of England 21,500 representations were made on the draft Regional Spatial Strategy, 78% of which were objections.</p>

No	Key Environmental Report findings	Response
		<p>The National Planning Policy Framework instead asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (such as the protections on Green Belt, high grade agricultural land, Areas of Outstanding Natural Beauty etc). They should prepare Strategic Housing Market Assessment to assess this need, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>They should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The practice guidance on Strategic Housing Land Availability Assessment states that the study area should preferably be a sub regional housing market area, but may be a local planning authority area, where necessary.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>The government continues to monitor housing supply across England at local authority level.</p> <p>The National Planning Policy Framework directs significant development towards the most sustainable locations. For example,</p>

No	Key Environmental Report findings	Response
		<p>developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure than the system of planning obligations where lengthy negotiations often create severe delays.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources), such as:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 & 11, and PPS10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.
8.	At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic	<p>The Government notes the findings of the Environmental Report but does not consider that it provides sufficient evidence to provide a clear judgement taking account of broader drivers of spatial change, the socio-economic consequences and regional economic circumstances.</p> <p>There are four Local Enterprise Partnerships</p>

No	Key Environmental Report findings	Response
	<p>consequences and reliance on other policy instruments for their resolution.</p>	<p>in the East of England region whose remit is to drive growth across their area making the most of its inherent strengths. These cover Norfolk and Suffolk; Greater Cambridge and Greater Peterborough; Hertfordshire and the south-east including Greater Essex, Kent and East Sussex.</p> <p>We note the judgement that there could be a reliance on other policy instruments. The Local Growth White Paper 2010, "Realising Every Place's Potential" established the Government's position on regional economic circumstances and set the framework for the ongoing activity of Local Enterprise Partnerships and investments such as the Growing Places Fund and the Regional Growth Fund.</p>

Chapter 4

How consultation on the Environmental Reports has been taken into account

4.1 Overview

As part of the environmental assessment of the revocation of the Regional Strategies, there has been consultation with the statutory consultation bodies on the scope and level of detail of the Environmental Reports, followed by a public consultation on the Environmental Reports on the effects of revoking each of the eight regional strategies.

Detailed responses to the first Environmental Report on the East of England, published in October 2011, were provided by consultees and summarised in the updated Environmental Report, published in July 2012.

The consultations and how they have been taken into account is summarised below.

4.2 Scoping Consultation

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be included in the Environmental Reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. Their comments on individual regions have been taken into account in the Environmental Reports for each region.

The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation. Scottish Natural Heritage considered that the implications for strategic planning for green infrastructure and the interface with the marine environment should be considered.

Annex A provides more detailed information on the responses to the scoping consultation and the Government response (which has been updated for inclusion in this post adoption statement).

4.3 Public Consultation on the first Environmental Report

As part of the assessment of the revocation of the Regional Strategies a public consultation on the eight Environmental Reports on the effects of revoking each of the eight regional strategies was undertaken. Consultation on the Environmental Reports was announced in both Houses of Parliament through a Written Ministerial Statement and copies were sent by email to the statutory consultation bodies, the equivalent organisations in the devolved administrations, all local planning authorities and organisations thought to have an interest in the process. Copies of the reports were also published on the Department for Communities and Local Government website. The consultations ran from 20 October 2011 to 20 January 2012.

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the Environmental Reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government Strategic Environmental Assessment Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). 15 responses dealt specifically with the Environmental Report for the East of England - only 5 responses were received from local planning authorities within the East of England. A further 64 dealt solely with Environmental Reports for regions other than the East of England. A summary of the 39 consultation responses relevant to the East of England Environmental Report is set out at Appendix F of the updated Environmental Report.

A high level summary of the issues raised on the first report and the response to those is set out in **Table 4.1** below. **Annex A** presents more detailed information and the responses.

Table 4.1 Summary of consultation responses to the first Environmental Report and the Government response

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The overall approach taken to Strategic	The Environment Agency supported the broad approach to the analysis presented in the October 2011 Environmental	Chapter 1 of the updated Environmental Report sets out how the report meets the requirements of the

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
Environmental Assessment	<p>Reports. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the East of England Regional Strategy on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.</p>	<p>Strategic Environmental Assessment Directive.</p> <p>The impacts of revoking, retaining or partially revoking the East of England Regional Strategy have been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics listed in Annex 1 to the Strategic Environmental Assessment Directive. This includes ‘cultural heritage – including architectural and archaeological heritage’.</p> <p>The Strategic Environmental Assessment has informed the Plan to Revoke as required by the Strategic Environmental Assessment directive.</p>
Assessment	<p>The Statutory Consultees drew attention to more up-to-date data that could be included in the Environmental Report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.</p>	<p>The updated Environmental Report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the East of England Regional Strategy in the short, medium and long term against all 12 Strategic Environmental Assessment topics, taking into account the content of local plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-</p>

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
		technical summary is provided.
Reliance on the National Planning Policy Framework	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the updated Environmental Report takes account of the policies set out in the Framework. This provides more policy certainty in assessing impacts.
Policy Change	Several respondents thought that the revocation of the East of England Regional Strategy would weaken certain policies, particularly the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The statutory duty to co-operate is in place and there are examples of cooperation on strategic issues in advance of the duty.

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
Reliance on the duty to co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Localism Act has introduced a new duty to co-operate on local authorities and supporting regulations are now in place. Council's who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The National Planning Policy Framework also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working in cross boundary strategic priorities.
Individual Topics	Respondents raised a number of questions about individual topics. In particular, respondents thought that the revocation of the East of England Regional Strategy could impact adversely on Green Belt, the provision of gypsies and traveller pitches, housing allocations, heritage, waste management, biodiversity, renewable energy, transport, water, brownfield land, coast, flooding and managed woodland.	The updated Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised by consultees.

As a result of considering the responses received, the changes made to the approach to the updated assessment were as follows:

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 Strategic Environmental Assessment Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the Plan to Revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.
- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the Strategic Environmental Assessment Annex I(f) topics.
- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects.
- Providing additional information on likely secondary, cumulative and synergistic effects of the Plan to Revoke the regional strategies.
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy.
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate.
- Providing further information that includes proposals to monitor any significant effects.

The updated Strategic Environmental Assessment of the Plan to Revoke the East of England Regional Strategy was undertaken in 2012 by AMEC on behalf of the Department for Communities and Local Government.

4.4 The Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the East of England Regional Strategy ran from 25 July 2012 to 20 September 2012.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for the East of England have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the East of England have been identified, described and assessed; and,
- the arrangements for monitoring.

In total 19 written responses were received summarised by interest group:

- 6 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- 4 Local authorities (Breckland Council, Stevenage DC, Chelmsford CC and East of England Waste Technical Advisory Group);
- 6 NGOs and local pressure groups (CPRE (West Midlands), Woburn Sands and District Society, Sustainability East, TCPA, Friends of the Earth, Stop Urbanisation of Norwich);
- 1 Solicitors and Barristers (Clyde and Co Solicitors); and
- 2 Industry representatives (EdF Energy and Renewables UK).

A summary of the comments and the Government's response is presented in **Table 4.2** below. Comments are structured by the questions asked above. Details of the comments are set out in **Annex B**.

Table 4.2 Summary of consultation responses to the updated Environmental Report

Issue	Summary of consultation responses to the updated Environmental Report	Response
The overall approach taken to Strategic Environmental	English Heritage, Natural England, the Environment Agency and Chelmsford City	The Government welcomes the comments on the updated Environmental

Issue	Summary of consultation responses to the updated Environmental Report	Response
Assessment	<p>Council considered that the Environmental Report provides a much more rigorous approach to the analysis. Natural England welcomed that their earlier comments had largely been incorporated in the options taken and the methodology pursued while the Environment Agency agreed with the overall approach taken to appraise the options. Other respondents agreed that the assessment was a considerable improvement.</p>	<p>Report and notes that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence, to update and build on the earlier assessments have been an important contribution to making the final decision on the Plan to Revoke the East of England Regional Strategy.</p>
Additional information	<p>Stevenage Borough Council considered that for a few environmental topics the baseline and the environmental characteristics of areas could be improved. The Environment Agency highlighted the importance of using upto date information in the baseline and provided a supplementary list of water companies for the East of England.</p>	<p>The approach to assessment was set out in the Strategic Environmental Assessment scoping consultation undertaken in May 2011. Consultation responses to the first Environmental Report indicated that further baseline and contextual information was needed. Appendix E of the updated Environmental Report supplements the previous baseline with substantial additional information covering all ten assessment topics at national, regional and sub-regional levels, consistent with the requirements of Annex I (b) to (e) of the Strategic Environmental Assessment Directive. Necessarily, the baseline will reflect information available at the</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
		time of completion; however, we are grateful for the additional information highlighted, although note it does not materially affect the assessment.
Likely significant effects	<p>A number of consultees (Breckland Council, TCPA, CPRE) questioned aspects of the assessments concerning:</p> <ul style="list-style-type: none"> • the assumptions around the effectiveness of the duty to co-operate; • the effect of uncertainty; • the lack of adverse environmental effects identified; and • the assessment of policies H1, E1, TH1 and H3 and H4. 	<p>Assumptions and uncertainties are explicit within each policy assessment in Appendix D and within section 3.4.5 of the updated Environmental Report.</p> <p>The short and medium term effects of uncertainty are reflected throughout the assessment and report and summarised in the key findings in Table 4.2 of the PAS.</p> <p>Positive and negative effects in the short, medium and long term were identified for the retention and revocation of all 86 policies in the East of England Regional Strategy. Significant negative effects were identified against the water, climate change and material resource topics.</p> <p>Appendix D presents the assessment of the revocation and retention of all policies. The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Clyde and Co and Icen Projects Ltd commented that the assessment had not considered the likely impacts on surrounding regions.</p> <p>RenewablesUK and the Environment Agency suggested that further consideration needs to be given on how strategic issues such as renewable energy production, biodiversity enhancement and landscape conservation, will be tackled locally.</p> <p>Natural England commented that the presentation of the material in the conclusion does not allow for consideration of how the scoring has been reached. Some of this information is contained within the extensive appendix,</p>	<p>subjectivity. These are presented in each topic chapter of Appendix E (Tables 1.5, 2.2, 3.1, 4.4, 5.2, 6.1, 7.2, 8.4, 9.1 and 10.1). Appendix E also set out the baseline and contextual information for each topic to inform the assessment. The approach taken has been to provide a robust and Strategic Environmental Assessment compliant assessment of effects.</p> <p>Page 108-109 of section 4.5 'Secondary, Cumulative and Synergistic Effects' outlines the effects on other regions.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS).</p> <p>Section 3 of the Environmental Report sets out the Strategic Environmental Assessment methodology used in the assessment. Appendix D contains the assessment of the effects of retention and revocation against all Strategic Environmental</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>however it is not clearly referenced and much of the information in the appendix does not relate to the assessment.</p>	<p>Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects. The commentary outlines the likely significant effects, any mitigation measures, assumptions and uncertainties. Appendix E focuses on the likely significant effects.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 and summarised in table NTS3.</p> <p>All information is summarised in Section 4, and 5 of this report and then further summarised in the Non Technical Summary.</p>
<p>Reasonable alternatives</p>	<p>Stevenage Borough Council considered that the report had not provided an outline of the reasons for selecting the alternatives dealt with</p> <p>East of England RTAB and Sustainability East both commented that the alternatives do not include the “business as usual” scenario, which in this case would be the retention of the Regional Strategy and updating it in accordance with other policy and requirements</p>	<p>Section 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation.</p> <p>The alternative of retaining the regional strategy and updating it in accordance with other policy and requirements over time was considered further under 2.4.1; however as the Localism Act 2011 removed the legal framework for the adoption of new or revised</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>over time.</p> <p>English Heritage commented that there could be an argument for any of the alternatives put forward. Natural England endorsed the alternatives selected for assessment.</p> <p>Stevenage Borough Council also stated that the Environmental Report does not clearly and explicitly state why, having considered a range of reasonable alternatives to revocation, the government still finds full revocation to be the preferred option.</p>	<p>Regional Strategies and it seemed implausible that all local authorities within the region, irrespective of background, circumstance and political composition would work in accordance with the duty to co-operate to update the East of England Regional Strategy, it was concluded that this was not a reasonable alternative.'</p> <p>It is the Government's view that the opening paragraph of section 2.4 of the Environmental Report provides a succinct statement of the preferred (pre-assessment) alternative. Section 6 of this Post Adoption Statement presents the justification of the Plan to Revoke as finally adopted following in response to the Strategic Environmental Assessment findings and the consultation on the Environmental Report (in line with Strategic Environmental Assessment regulation 16 (4)).</p>
Monitoring	<p>English Heritage, the Environment Agency, RenewablesUK and Friends of the Earth suggested additional monitoring measures.</p>	<p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the East of England Regional Strategy are contained in the Post Adoption Statement (section 7 and Annex C).</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
<p>Reliance on the duty to co-operate</p>	<p>Some respondents (Clyde and Co LLP, East of England RTAB and Sustainability East) thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.</p>	<p>The Government has introduced a new duty to co-operate and supporting regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The National Planning Policy Framework also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.</p>
<p>Predetermination</p>	<p>Stevenage Borough Council and Clyde and Co commented that the preferred alternative was chosen before any assessment work was undertaken and the outcome of the process had been predetermined.</p>	<p>The Government announced in the Coalition Agreement its intention to “rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils”. However, the policy has been subject to extended consultation (through Strategic Environmental Assessment) and been assessed against the requirements of the Strategic Environmental Assessment Directive. The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives), the extensive consultation and consideration of consultation responses in the final decision to revoke the East of England Regional Strategy. If as a result of monitoring of the effects, it became apparent that implementation had lead to significant negative environmental effects, the Government will consider whether any further mitigation or intervention is needed..</p>
Individual Topics	<p>Respondents raised a number of questions about individual topics. In particular, respondents thought that the impact of the revocation of the East of England regional strategy could impact on Green Belt, the provision of gypsy and traveller pitches, heritage, biodiversity, and renewable energy.</p>	<p>Appendix D of the updated Environmental Report contains the assessment of the effects of retention and revocation against all Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects. Appendix E presents information covering all ten assessment topics at national, regional and sub-</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
		regional levels, consistent with the requirements of Annex I (b) to (e) of the Strategic Environmental Assessment Directive and focuses on those likely significant effects identified in Appendix D.

Three representations from the Woburn Sands and District Society, Stop Norwich Urbanisation and the from the Campaign to Protect Rural England (West Midlands) which supported the Government's intention to revoke regional strategies, because they believe regional strategies impose top-down forms of development upon communities. They wanted regional strategies to be revoked so as to give local councils and local people the ability to determine the shape of the communities in which they live.

In light of the findings of the assessment as reported in the Environment Report, the comments received from consultees and the framework for environmental protection and planning that is in place, the Government is content that environmental considerations have been adequately incorporated into the Plan to Revoke the regional strategy. As explained in Section 6 below, where significant effects and/or uncertainty have been identified, a programme of monitoring has been proposed to enable future consideration of whether any further mitigation or intervention is needed.

Chapter 5

The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

5.1 Policy background

The Government proposed the Plan to Revoke the East of England Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth.

Every local area has its own set of needs and priorities, its aspirations, unique features and heritage. Only local people understand this so when they have the tools to plan, development happens through consensus by recognition of the benefits of development to the community and with wider benefits for growth. Local empowerment can lead to development that is more sensitive and responsive to the character of the communities in which we live, including to habitats and the natural environment.

While the Government believes that local empowerment can support growth, it also recognises that cross-boundary development, such as housing or transport, are critical to driving economic growth. So, the revocation of the East of England Regional Strategy does not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans.

The Localism Act 2011 has complemented the powers to remove regional strategies with a new statutory duty to co-operate (inserting a new section 33A of the Planning and Compulsory Purchase Act 2004). The duty to co-operate requires local councils and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic matters in local and marine plans.

Through national planning policy, we will ensure that local plans are effective vehicles for strategic planning and growth. Local plans, produced by local people, are the keystone of the planning system. They are now the channel for strategic planning and set the framework for neighbourhood plans. In particular, the National Planning Policy Framework is clear that:

- the planning system should be genuinely plan-led and support sustainable economic growth, proactively driving the homes and jobs that we need.
- local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites.
- in line with the presumption in favour of sustainable development, local councils should approve development that accords with the local plan. Where that plan is out of date, councils must grant planning permission for development that is sustainable without delay.
- local councils must plan in their local plans for strategic development, reflecting the strategic priorities set out at paragraph 156 of the Framework.

The policies in the National Planning Policy Framework, and in particular the presumption, provide certainty for local councils, developers and communities about the role of local plans in planning for growth and planning decisions.

The new **Planning policy for traveller sites** (March 2012) requires that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. It asks local authorities to:

- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities.
- set pitch targets for Gypsies and Travellers which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets, and a supply of specific, deliverable sites or broad locations for growth for six to ten and where possible for years 11-15.

The Government's planning reforms also include a package of incentives to encourage growth. These include the New Homes Bonus which rewards communities for each new home built; the Community Infrastructure Levy which enables councils to levy money on new development; and the Business

Rates Retention which allows authorities to directly profit from business rates raised in their area.

This policy background sets in context the reasons for the Government's preferred option to revoke the Regional Strategy and illustrates the structure of the planning system that will be left in place post revocation.

5.2 The Reasonable Alternatives

The first Environmental Report on the proposed revocation of the East of England Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the East of England Plan entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F to the updated Environmental Report) including partial revocation. In considering these responses and following the application of the reasonableness test in compliance with Article 5(1) of the Strategic Environmental Assessment Directive, the following alternatives to the Plan to Revoke were taken forward for the updated assessment within the Strategic Environmental Assessment:

- **Retention** of the East of England Regional Strategy but not updating it in the future.
- **Partial revocation of the East of England Regional Strategy either by:**
 - Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies, ambitions and priorities; or
 - Retaining for a transitional period all the spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and revoking the non spatial policies, ambitions and priorities; or
 - Retaining for a transitional period policies, ambitions and/or priorities, the revocation of which may lead to likely significant negative environmental effects.

5.3 The Reasons for Choosing the Plan to Revoke the East of England Regional Strategy in light of the other Reasonable Alternatives dealt with

The Government has carefully considered each of the reasonable alternatives and the environmental effects assessed in relation to those reasonable alternatives, set out in the updated Environmental Report⁵. In doing this the Government has taken account of the consultation responses to both the initial and the updated Environmental Reports. The Government welcomes the comments on both of those reports and notes that that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence to update and build on the earlier assessments, have been an important contribution to making the final decision on the Plan to Revoke the East of England Regional Strategy. The summary of consultation responses set out in this report show that consultees welcomed the rigorous approach to assessment of environmental effects.

One respondent considered that for a few environmental topics the environmental characteristics could be improved and one respondent provided a supplementary list of water companies. The Government considered that the updated Environmental Report provides substantial additional information on the environmental baseline and the environmental characteristics of the East of England region, were grateful to the additional information on water companies provided, but did not consider that these points materially affected the assessment of the environmental effects.

Some respondents questioned aspects of the assessment concerning assumptions, uncertainty; the lack of effects identified and the assessment of policies H1, E1, TH1, H3 and H4; the impact on surrounding regions; and the consideration of strategic issues. The Government considers that all these issues have been dealt with rigorously in the updated Environmental Report and Table 5.2 presents a summary of where these issues are addressed in the updated report.

There were some questions from some respondents about the reasons for the selection of reasonable alternatives dealt with and whether there had been consideration of an alternative that could retain the Regional Strategy. The Government considers that these have been adequately covered in the updated Environmental Report. One respondent asked for reasons why, following consideration of the reasonable alternatives, the preferred approach had not been set out in the updated Environmental report. It is explained in Table 5.2 that the explanation is set out in this Post Adoption Statement, in accordance with the requirements of the Strategic Environmental Assessment Directive.

⁵ Strategic Environmental Assessment of the Revocation of the East of England Regional Strategy: AMEC Environment & Infrastructure UK Limited: July 2012

Some respondents thought it unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at sufficiently large scale. The Government disagrees with this view in light of the policies on strategic planning set out in the National Planning Policy Framework and the fact that councils that have not complied with the duty may fail the local plan independent examination.

One respondent thought the Government had decided on the preferred option before the assessment was undertaken and thus predetermined the issue. The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives), the extensive consultation and consideration of consultation responses in the final decision to revoke the East of England Regional Strategy.

Four respondents suggested additional monitoring measures. The proposals for monitoring, which take account of these responses, are set out in Section 7 and Annex C of this report. Lastly, there were also some questions from some respondents on individual topics such as the Green Belt, the provision of gypsy and traveller pitches, heritage and biodiversity and renewable energy. The Government considers that these issues have all been adequately addressed in Appendix D and Appendix E of the updated Environmental Report.

In conclusion, none of the responses to the consultation on the updated Environmental Report has led the Government to reconsider the adequacy of the assessment of the environmental effects of the Plan to Revoke the East of England Regional Strategy, and the reasonable alternatives to the Plan, set out in the updated Environmental Report.

In light of this conclusion the Government considered each of the reasonable alternatives, and the environmental effects assessed in relation to those reasonable alternatives, as follows:

(i) On the **retention** of the East of England Regional Strategy but not updating it in the future it was noted in the updated Environmental Report that there will be significant positive environmental effects, although these will be largely similar to those if the Regional Strategy were revoked. The only area where retention of the Regional Strategy would lead to significant negative effects is in relation to water resources arising from development associated with policies for housing and employment provision, although the Government notes that a similar policy performance is recorded for the revocation alternative. For the majority of policies, the updated Environmental Report found it difficult to identify clear differences between the effects of retention and revocation. The Government considers that the retention of the Regional Strategy would lead to a strategy that was a consideration in plan-making and

decision taking but with policies based on increasingly out of date evidence or which run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning and does not therefore consider that it should pursue this alternative.

(ii) On **partial revocation**, the updated Environmental Report noted that there were a number of policies where potential significant negative environmental effects were identified for the **revocation of the quantified and spatially specific policies**. However, the effects were also identified for retention of the Regional Strategy. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would become increasingly out of date or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The National Planning Policy Framework makes clear the evidence on which Local Plans should be based, including quantified demand for housing and other uses, and where the duty to co-operate is particularly relevant.

(iii) Specific effects for **retention for a transitional period of policies which set the quantum for development or which are spatially specific** were identified in the updated Environmental Report. These include potential significant negative environmental effects on water and/or material assets and, from some policies, on soils, and significant positive effects of some policies on population and human health. The Environmental Report also noted that retention of these policies for a transitional period may result in some confusion with the intent of the National Planning Policy Framework and how they are to be applied. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would be based on increasingly out of date evidence or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The updated Environmental Report further noted that “as the review of the strategy which stopped in May 2010 clearly demonstrates, the published figures for housing are known to be too high in some areas and too low in others (hence the review). In the absence of a mechanism to review the policies in the future, these shortcomings would remain in place until the policies were revoked”.

(iv) **Regarding retention of policies, the revocation of which may lead to likely significant negative environmental effects**, the updated Environmental Report also found that there are no policies in the Regional Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. Where there is a potential significant negative effect this is the same issue for retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the Regional Strategy itself.

In relation to each of the reasonable alternatives assessed there has not been found to be a significant difference in the environmental effects as against those for the preferred option of revocation (as evidenced in Appendix D of

the updated Environmental Report). For retaining quantified and spatially specific priorities there were found to be potential positive and negative effects, but recognition that policies are based on evidence that would become increasingly out of date and could gradually lead to a decline in the positive effects that the strategy aimed to deliver and potential conflicts with policies that local communities wish to pursue will increase. For these reasons and given the structures and framework already in place the Government does not consider that the retention of any of the policies in the East of England Regional Strategy is necessary.

Therefore in light of the policy background and reasons for the Plan to Revoke the East of England Regional Strategy, consideration of the environmental effects of the Plan to Revoke and the reasonable alternatives, and consideration of responses to the Environmental Reports, the Government has decided to proceed with its preferred option to revoke the East of England Regional Strategy.

Chapter 6

The measures decided concerning monitoring

Monitoring of the effects of the Plan to Revoke the East of England Regional Strategy will focus on:

- The significant effects identified in the assessment that may give rise to irreversible damage, where appropriate, relevant mitigating measures can be taken; and
- Uncertain effects where monitoring would enable preventative or mitigating measures to be undertaken.

Consistent with the proposals of the updated Environmental Report, potential effects against all the environmental topics have been included in the monitoring framework. Specific additional monitoring suggestions were made by consultees and are outlined in the summary of consultation in **Annex B**. The final measures are presented in **Annex C**.

The monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts. For example, the Environment Agency's requirements under the Water Framework Directive, the Department for Environment, Food and Rural Affairs' requirements with regard to Air Quality Management Areas and the Department for Communities and Local Government's commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The metrics are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

The Department for Communities and Local Government will make periodic reference to the metrics and sources of information contained in Annex C to review the effects of revocation

ANNEX A

Consultation and Partner Engagement – Initial Environmental Report

Reponses to scoping stage of the preparation of the Initial Environmental Report

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be included in the Environmental Reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. The statutory bodies agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate.

Table A1: Summary of statutory body’s responses at the Strategic Environmental Assessment scoping stage

No	General	Detailed comments	Raised by	Response
1.	Scope and Detail	The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation.	Environment Agency, Natural England, English Heritage	The Environmental Report has been produced consistent with the requirements of the Strategic Environmental Assessment Directive. Responses to the detailed points raised at scoping stage are set out in the rest of the Table.
2	Reliance on the duty to co-operate and the National Planning Policy Framework	The Environment Agency, Natural England and English Heritage questioned whether the reliance on the draft duty to co-operate was sufficient to capture and address cross-boundary issues or cumulative effects of multiple local authorities’ local plans. Scottish	Environment Agency, Natural England, English Heritage, Scottish Natural Heritage	Since the scoping report was prepared the Government has published the National Planning Policy Framework in March 2012 and commenced provisions in the Localism Act 2011 implementing the duty to co-operate.

No	General	Detailed comments	Raised by	Response
		<p>Natural Heritage thought there should be consideration of the impacts on the protection and enhancement of networks to allow species dispersal throughout Britain.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework. Since the National Planning Policy Framework was still in its draft form, this needs to be more fully considered. It is also difficult to predict what local authorities will do post revocation of regional strategies so that the environmental effects of their revocation is more likely to be “uncertain” rather than positive.</p>		
3	Topics to be considered	The Environment Agency considered that the impacts on climate change, water quality and water resources should be fully assessed. The Water Framework Directive should be considered as well as strategic planning of water resources.	Environment Agency	Appendix D of the updated Environmental Report published for consultation in July 2012 contains an assessment of the effects of retention and revocation of individual policies on climate change, water quality and water resources. Appendix E reviews the baseline condition

No	General	Detailed comments	Raised by	Response
				for each of the Strategic Environmental Assessment topics (including climatic factors and water) and assesses the likely effects on the baseline of retaining and revoking individual policies, the Regional Strategy as a whole and reasonable alternatives.
4	Water Quality	There are currently issues around accommodating growth within existing Waste Water Treatment Works consent limits, and without compromising Water Framework Directive requirements. This issue should be acknowledged in the assessment. The assessment could usefully inform the allocation of growth across catchments, which are likely to be wider than an individual local authority boundary. The assessment should also consider how strategic cross-boundary water quality issues will be dealt with following the revocation of the Regional Strategy.	Environment Agency	<p>In accordance with Annex 1(f) of the Strategic Environmental Assessment Directive water quality issues have been assessed. This assessment includes the consideration of the topics in Appendix E of the updated Environmental Report, as part of the assessment of the retention and revocation of individual policies, the overall assessment of the revocation of the East of England Regional Strategy and reasonable alternatives. The revocation and retention of Policies WAT 1-4, including water supply is considered in detail in Appendix D of the updated Environmental Report.</p> <p>This analysis also takes account of how the duty to co-operate will underpin strategic cross-boundary planning by local</p>

No	General	Detailed comments	Raised by	Response
				planning authorities on issues such as water management.
5	Water resources	<p>The Environment Agency considered that the demand for water is dependent on the number of households, number of occupants and the per capita consumption of occupants. If the post Regional Strategy forecast housing numbers increase, even with the same population and thus lower occupancy, then per capita consumption of water is likely to be higher, resulting in a higher demand for water. Similarly, if the number of houses forecast remained the same and the per capita consumption of water increased, or occupancy increased, then this would also increase the demand for water.</p> <p>Change in water use will be influenced by the post Regional Strategy policies of individual local authorities. These effects may not be uniform for all local authorities. Therefore, the net effects on water resources of having a regional strategy or not could be zero, more or</p>	Environment Agency	<p>Water resources have been assessed under the Strategic Environmental Assessment topic water in Chapter 3 of the updated Environmental Report. This includes the consideration of the topics in Appendix E of the report, as part of the assessment of the retention and revocation of individual policies and the overall assessment of the revocation of the East of England Regional Strategy and reasonable alternatives. This also takes account of the strategic planning cross-boundary issues which the water companies' Water Resources Management Plans address. Further statutory requirements on water companies under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning are designed to ensure a sustainable supply of water over the next 25 years.</p> <p>The revocation and retention of Policies</p>

No	General	Detailed comments	Raised by	Response
		<p>less. Increases in housing numbers could be considered against the relevant water companies Water Resources Management Plan to ensure that the company is able to supply the additional households. The same applies to any redistribution of households within the existing overall housing numbers. Moving planned builds to another local authority area or within a local authority area may shift the demand into a different water company water resource zone. The effects of this on the company's ability to supply the 'additional' houses should be considered.</p>		<p>WAT 1-4, including water supply is considered in detail in Appendix D of the updated Environmental Report.</p>
6	Waste	<p>Waste plans, required to meet the requirements of the Waste Framework Directive, will need a strong evidence base to support them. The East of England study on commercial and industrial waste arisings was carried out within the Regional Strategy framework. The resulting data and Regional Strategy policies on construction and</p>	Environment Agency	<p>Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst the Planning and Compulsory Purchase Act 2004 provides for two or more local planning authorities to prepare joint local plans either through joint working under Section 28 or through the</p>

No	General	Detailed comments	Raised by	Response
		<p>industrial waste were used by Waste Planning Authorities to determine the future need and location for waste facilities. Upgraded and agreed evidence could be shared between local authorities at a strategic level, to ensure that facilities are built in the right location and potentially at the right scale.</p> <p>The Environment Agency noted that the local authorities in the East of England are continuing to meet to discuss waste planning.</p> <p>The East of England Regional Strategy provided clear direction on the management of London's waste in the East of England. The agreed apportionment figures and related policy allowed waste planning authorities to plan and monitor consistently for the management of imported waste. Ways could be found to maintain this evidence base which local authorities rely on to address and monitor strategic waste issues. The assessment should</p>		<p>establishment of a joint committee under Section 29. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework including for the planning of waste infrastructure.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National Planning Policy Framework (paragraph 156) states that local planning authorities should work with other</p>

No	General	Detailed comments	Raised by	Response
		consider the impact of the loss of regional waste data on waste planning authorities.		authorities and providers to assess the quality and capacity of infrastructure for waste and its ability to meet forecast demands. Further PPS10 The Waste Planning Policy Statement will remain in place until the National Waste Management Plan is published. Appendix C of the updated Environmental Report illustrates the progress that local authorities have made in the East of England to prepare Waste Management Plans.
7	Climate Change	<p>Climate risk and associated adaptation actions should be assessed to help ensure resilience to future climate change. Local authorities could put monitoring mechanisms in place, as action or inaction by one local authority could impact on neighbouring authorities. We suggest that possible mechanisms for monitoring resilience to climate change are considered within the assessment.</p> <p>The first Environmental Report stated that local authorities may find it useful to</p>	Environment Agency, Scottish Natural Heritage	<p>Climate change issues are assessed as part of the climatic factors Strategic Environmental Assessment topic in Chapter 3 of the updated Environmental Report and also set out in Appendix E. We have considered mechanisms for monitoring resilience to climate change and the proposals for monitoring, including for climatic factors, and were also considered in Chapter 5 and Appendix C.</p> <p>Data prepared at a regional level to inform the preparation of regional strategies is</p>

No	General	Detailed comments	Raised by	Response
		draw on regional data including assessments of the potential for renewable and low carbon energy. This should be considered in greater detail at the next stage of the environmental assessment. Strategic issues need to be addressed		still available for local planning authorities to use, individually or collectively were they have decided to prepare joint local plans or development plan documents on strategic planning issues such as waste management, transport infrastructure or large scale housing development. Local planning authorities will also commission additional research when necessary on a variety of key planning issues including assessment of the potential for renewable and low carbon energy.
8	Growth	Assumptions on future growth, including for housing allocations, are important when making assessments of the potential impacts of revocation of the regional strategies. An assumption that lower levels of growth (than that proposed by the Regional Strategy) may be pursued by local authorities may lessen pressures on negative regional trends. However the majority of local authorities in the East of England are planning to retain the Regional Strategy figures and some authorities have	Environment Agency and English Heritage	<p>In order to better understand the content of local plans, the updated Environmental Report has taken into account local plan policies as illustrated in Appendix C on housing, pitches for gypsies and traveller sites, renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded and updated in the updated Environmental Report, including for heritage assets and river basin management plans.</p> <p>In the absence of the East of England</p>

No	General	Detailed comments	Raised by	Response
		<p>already adopted Core Strategies that are in line with the Regional Strategy figures. It is possible that some local authorities may decide to increase their housing figures above Regional Strategy targets which could potentially result in significant environmental effects.</p> <p>It may become more challenging to accommodate growth in certain river catchments - all available, up-to-date information should be utilised when carrying out the next stage of the assessment.</p>		<p>Regional Strategy, this does not mean the end of a strategic approach to planning and development plan preparation. Strategic planning will be taken forward by local planning authorities, this represents a shift towards a locally-led approach to planning for cross-boundary matters in local plans. This approach to development will be more sensitive and responsive to the character of communities, including the habitats and the natural environment of localities.</p>
9	Marine Planning	<p>The East of England Regional Strategy was adopted before the marine planning process started. It therefore did not account for the role that marine planning can play, not just within the marine environment, but also on land. Many of the Sustainability Appraisal objectives could be compared to the aims of the marine planning process. It was suggested that the Marine Management Organisation (MMO) be consulted at all</p>	Environment Agency	<p>The consultation on the Environmental Report is a public one and comments from all parties with an interest are welcome. The Environmental Report published in October 2011 and the updated Environmental Report published in July 2012 were sent to the MMO for comment.</p>

No	General	Detailed comments	Raised by	Response
		<p>stages of the assessment, given that their plans could potentially apply to the areas covered by this environmental assessment.</p>		
10	Cumulative Effects	<p>The Environmental Report should effectively assess cumulative impacts and mitigation measures of many small adverse impacts on the environment for instance on climate change including greenhouse gas emissions.</p>	Environment Agency	<p>Cumulative impacts are taken into account in the assessment presented in the Environmental Reports. The approach to the analysis is set out in the methodology in Chapter 3, and a discussion of the impacts is included in Chapter 4. Mitigation measures are considered throughout the updated Environmental report including for individual Strategic Environmental Assessment topics, and the retention and revocation of individual regional policies.</p>
11	Regional Heritage Policies	<p>English Heritage noted that some policies are only in regional strategies, not in local plans hence the risk of “policy gaps” if these regional policies are not saved. They questioned the assumption that local authorities will carry forward regional policies to secure the boundaries of Green Belts around historic settlements, and whether</p>	Environment Agency	<p>The National Planning Policy Framework, published in March 2012, continues to provide protection for heritage assets and designated heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, which have a degree of significance meriting consideration in planning</p>

No	General	Detailed comments	Raised by	Response
		<p>existing national heritage policies will be carried forward to the National Planning Policy Framework. They thought that regional heritage policies do not just repeat national policy, but include regionally specific detail. They asked for more material to be included in the historic environment baseline data.</p> <p>They considered that the revocation of the regional strategies will result in significant adverse effects which should be mitigated, in particular:</p> <p>The raison d'être for the Cambridge Green Belt should be reflected in strategic planning policy, perhaps in the National Planning Policy Framework alongside other historic town Green Belt designations;</p> <p>The national/regional overview of the significance of historic assets (summarised in the Historic Environment policy) will be lost, although the National Planning Policy Framework could underline English Heritage's role in identifying historic</p>		<p>decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.</p> <p>The Government attaches great importance to Green Belts and has maintained strong protection for them in the National Planning Policy Framework. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the</p>

No	General	Detailed comments	Raised by	Response
		<p>character of more than local significance; and</p> <p>The uncertainty in relation to housing numbers could result in planning by appeal, which is more likely to be harmful to historic environment interests. Transitional arrangements should be considered.</p> <p>Many of the sub-regional policies identify sensitive the historic environments of settlements and their regeneration needs. The loss of such references will affect the extent to which these issues are clearly flagged for local plan preparation work. It is vital that the PPS5 advice on understanding place and the positive contribution of heritage to regeneration is retained in the National Planning Policy Framework.</p>		<p>potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances. A change to a Green Belt boundary would need to take place through the local plan process, which would involve public consultation and an independent examination. At that time, authorities should consider the</p>

No	General	Detailed comments	Raised by	Response
				<p>Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included.</p> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt.</p> <p>The policies set out on the Cambridge</p>

No	General	Detailed comments	Raised by	Response
				<p>Green Belt are repeated in the Local Plan for Cambridge and as such revocation of the Regional Strategy would not change the status of the Green Belt around Cambridge. An analysis of this is set out in Appendix C of the updated Environmental report and reflected in the assessment of policy CSR3 in Appendix D.</p>
12	Site Specific Analysis	<p>Natural England thought that there needed to be more analysis of site specific issues, for example the policies covering development in Harlow and Great Yarmouth in recognising the limitations on available water treatment capacity. If similar levels of development go ahead regardless of the revocation of the Regional Strategies there will be no strategic guidance for local authorities on how to deal with the situation – this potential impact should be acknowledged.</p>	Natural England	<p>The updated Environmental Report includes an analysis of the content of local plans where Regional Strategy policies include the allocation of a quantum of development or land to an individual local authority or are locationally specific. Policies relating to Great Yarmouth and Harlow are included in the analysis of individual policies in Appendix D.</p>

Representations received in response to the first public consultation on the proposed revocation of the East of England Regional Strategy

The consultation on the first Environmental Report ran from 20 October 2011 to 20 January 2012.

The representations received on the proposed revocation of the East of England Regional Strategy have been summarised in the two following tables. The first provides a headline summary of the issues. The responses are grouped under the following themes:

- The Overall Approach to Strategic Environmental Assessment;
- Assessment;
- Reliance on the National Planning Policy Framework;
- Policy Change;
- Reliance on the duty to co-operate;
- Individual Topics (covering greenbelt, gypsies and travellers, housing supply and growth, heritage, waste, biodiversity, renewable energy, transport, water, Brownfield land, the coast, flooding and woodland).

Since the responses received to the consultation of this first report, a significant amount of policy and legislation has been developed (for instance the publication of National Planning Policy Framework and the introduction of the duty to co-operate) and so some of these comments have inevitably been overtaken by events. The comments relevant to the first Environmental report for the East of England (i.e. responses specifically to the East of England report and comments that applied to all regions including the East of England) are presented in summary below, together with how they have been addressed in the updated Environmental Report.

Table A2: Summary of consultation responses – headline issues

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The overall approach taken to Strategic Environmental Assessment	The Environment Agency supported the broad approach to the analysis presented in the October 2011 Environmental Reports. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the	Chapter 1 of the updated Environmental Report sets out how the report meets the requirements of the Strategic Environmental Assessment Directive. The impacts of revoking, retaining or partially

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the East of England Regional Strategy on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.</p>	<p>revoking the East of England Regional Strategy have been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics listed in Annex 1 to the Strategic Environmental Assessment Directive. This includes 'cultural heritage – including architectural and archaeological heritage'.</p> <p>The Strategic Environmental Assessment has informed the Plan to Revoke as required by the Strategic Environmental Assessment directive.</p>
Assessment	<p>The Statutory Consultees drew attention to more up-to-date data that could be included in the Environmental Report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.</p>	<p>The updated Environmental Report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the East of England Regional Strategy in the short, medium and long term against all 12 Strategic Environmental Assessment topics, taking into account the content of local plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-technical summary is provided.</p>
Reliance on	A number of respondents	The Government published

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
the National Planning Policy Framework	thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	the National Planning Policy Framework in March 2012. The analysis presented in the Environmental Report takes account of the policies set out in the Framework. This provides more policy certainty in assessing impacts.
Policy Change	Several respondents thought that the revocation of the East of England Regional Strategy would weaken certain policies, particularly the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The statutory duty to co-operate is in place and there are examples of cooperation on strategic issues in advance of the duty.
Reliance on the duty to co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust	The Localism Act has introduced a new duty to co-operate on local authorities and supporting

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>enough to enable strategic planning across local government boundaries at a sufficiently large scale.</p>	<p>regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The National Planning Policy Framework also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working in cross boundary strategic priorities.</p>
<p>Individual Topics</p>	<p>Respondents raised a number of questions about individual topics. In particular, respondents thought that the revocation of the East of England Regional Strategy could impact adversely on Green Belt, the provision of gypsies and traveller pitches, housing allocations, heritage, waste management, biodiversity, renewable energy, transport, water, brownfield land, coast, flooding and managed woodland.</p>	<p>The updated Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised by consultees.</p>

More detailed information on each respondent's comments is provided in Table A3. Information in the table includes:

- The overall issue
- Detailed information on the comments made:
- The respondents who raised the issue; and
- A response.

Table A3: Responses to the consultation on the initial Environmental Report (published in October 2011) (this table has been revised following the close of consultation on the updated Environmental Report)

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	The overall approach taken to Strategic Environmental Assessment	The Environment Agency supported the broad approach to the analysis presented in the Environmental Reports published in October 2011. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the East of England Regional Strategy on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.	Environment Agency, Natural England and English Heritage	The impact of retaining, partially revoking and fully revoking the East of England Regional Strategy has been assessed in detail in the updated Environmental Report in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This includes an assessment of cultural heritage – including architectural and archaeological heritage. In light of English Heritage’s comments that the National Planning Policy Framework lacks the specificity of the East of England Plan, we welcome their willingness to work with Local Planning Authorities through the duty to co-operate on “embedding the historic environment within the definition of sustainable development” when preparing local plans.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
2	The overall approach taken to Strategic Environmental Assessment	The consultation on the assessment of the revocation of regional strategies which ran from October 2011 was contrary to the requirements of Article 6(5) of the Directive.	Clyde and Co LLP and Icen Projects	<p>The Government disagrees that the consultation process undertaken in October 2011 was contrary to the requirements of Article 6(5) of the Directive which states that the “detailed arrangements for the information and consultation of the authorities and the public shall be determined by Member States”. This requirement is transposed into English law by regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report published in July 2012, which takes account of consultation responses, demonstrates the Government’s desire to consult fully on the assessment of the impacts of revocation of the Regional Strategy.</p> <p>Chapter 1 of the updated Environmental Report sets out the purpose of the consultation and sets out a number of</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>questions on which the Government would particularly welcome responses and have therefore complied with Article 6 of the Strategic Environmental Assessment directive.</p>
3	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>CPRE East of England disagreed with the Government's view that Strategic Environmental Assessment was not necessary and therefore considered that Government was not at liberty to undertake the assessment voluntarily. The Environmental Report should have considered the need for strategic planning for the environment at a spatial tier above the individual local authority.</p>	<p>CPRE East of England</p>	<p>On 22 March 2012 in the case of Bruxelles the Court of Justice of the European Union considered whether the Strategic Environmental Assessment Directive applied to a procedure for the total or partial revocation of a land use plan. The Court concluded that where revocation of a plan may modify the state of the environment as examined at the time of adoption of the plan, a Strategic Environmental Assessment will be required to aid consideration of such effects.</p> <p>The updated Environmental Report assesses the retention, partial revocation and revocation of the East of England Regional Strategy which includes a consideration of the impact of removing regional scale environmental strategic policies.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				Both the first and updated Environmental Reports on the Plan to Revoke the East of England Regional Strategy were assessed in accordance with the requirements of the Strategic Environmental Assessment Directive..
4	The Overall Approach to Strategic Environmental Assessment	The environmental assessment had been carried out too late in the process, and should have been conducted prior to the initial decisions to revoke the regional strategies. Strategic Environmental Assessment carried out at an early stage and with an open mind helps to identify the environmental consequences of revocation and steps which could be taken to mitigate any adverse impacts (such as saving significant environmental policies).	RenewableUK, Royal Society for the Protection of Birds, Wildlife and Countryside Link	<p>The Government signalled its proposed intention to remove the regional tier of Government and return decision making on housing and planning to local authorities in the coalition agreement. Parliament subsequently agreed to the removal of the legal framework for Regional Strategies through the repeal of Part 5 of the Local Democracy, Economic Development and Construction Act 2009 (through section 109 of the Localism Act 2011) and gave the Secretary of State powers to revoke the whole or any part of a Regional Strategy by order.</p> <p>Any decision to revoke the regional strategies has always been dependent on and subject to</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>the outcome of the environmental assessments.</p> <p>The Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of responses, demonstrates this and is in accordance with the requirements of the Strategic Environmental Assessment Directive and its objectives. Each policy in the Regional Strategy has been assessed.</p> <p>The outcome of the consultations on the Environmental Reports will form part of the matters that will be taken into account in deciding whether or not to revoke the regional strategies and the reasonable alternatives to that.</p>
5	The overall approach taken to Strategic	The approach to the environmental assessment was inadequate, both in terms of scoping, identification of significant effects and testing of reasonable	Luton Borough Council	The updated Environmental Report sets out how the requirements of the Strategic Environmental Assessment Directive are met. The revocation of the East of England

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	Environmental Assessment	<p>alternatives. In particular that the Environmental Report criticised the environmental implications of the Regional Strategy's planned 'step-change' of providing 508,000 dwellings over 20 years but itself, failed to address the issue of a preferred quantum of development or indeed any reasonable alternatives, with which to address evidence of national and regional demand, within environmental objectives (e.g. 2008-based projections show the need to accommodate an additional 806,000 households in the East Region 2008-2033).</p> <p>Specifically, a critical approach identifying strategic options, strengths/weaknesses, and necessary mitigating measures, would have been more valuable in exploring the 'pros and cons' of a 'Localism based' planning system.</p>		Regional Strategy has been assessed against a number of reasonable alternatives in the short, medium and long term for all 12 Strategic Environmental Assessment topics. Where significant effects are found mitigation measures are described. The requirements of the Directive have been met.
6	The overall approach taken to	The Town and Country Planning Association were concerned that the Environmental Reports did not represent an	Town and Country Planning	The October 2011 Environmental Report was structured around the individual requirements of the Strategic Environmental Assessment

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	Strategic Environmental Assessment	analytically robust and rigorous assessment of the likely impacts or how they may be mitigated. They considered that not all of the Directive's provisions had been addressed with sufficient robustness to provide an appropriate means of assessment, with, for example, reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The Environmental Reports did not explore the potential short-term impacts that could arise in the interim period while the Regional Strategy is revoked, but before adopted local plans are in place. The reports do not project what the future might be like under local plans prepared with a minimum of national guidelines. The reports should contain more analysis of minerals and waste, infrastructure, town centre development, new settlements and major urban expansions.	Association	Directive. Chapter 1 of the updated Environmental Report sets out which parts of the report address the requirements of the Directive. The Plan to Revoke is to replace the East of England Regional Strategy (the East of England Plan and Regional Economic Strategy) with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth. The Plan to Revoke is set out in more detail in Section 2 of the Environmental Report published in July 2012 attached at Annex B. The updated report provides analysis and assessment of the short, medium long term and cumulative effects of the Plan to Revoke the Regional Strategy.
7	Assessment – likelihood of effects	The assessment had placed unquestioning faith in the environmental benefits of the Government's planning reforms, and	Hives Planning Ltd, The East of England Environment	The short, medium and long term impacts of retaining, partially revoking and revoking the East of England Regional Strategy have been

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		seemed to be a justification for revocation rather than objective analysis. The assumptions within the Environmental Report that revocation of the Regional Strategy will have no significant adverse environmental effects were untested and unsupported by evidence.	Forum (EEEF); Levett-Therivel; Tweek Environmental Consultants; Collingwood Environmental Planning	assessed in detail in the updated Environmental Report for each of the 12 Strategic Environmental Assessment topics.
8	Assessment – cumulative impacts	The Environmental Report should assess the cumulative effects of revocation, in particular the consequent capacity for ‘linked or cumulative, synergistic or secondary effects’ coupled with the need for environmental assessment to adapt to the scale and nature of the plan in question. The assessment should include a consideration of the impact of the revocation of all the Regional Strategies.	Clyde and Co LLP; Levett- Therivel; Tweek Environmental Consultants; Collingwood Environmental Planning	To provide the context for the assessment, and in compliance with the Strategic Environmental Assessment Directive, the relevant aspects of the current state of the environment and its evolution without the plan were considered, along with environmental characteristics likely to be significantly affected. Chapter 3 of the updated Environmental Report sets out the assessment methodology for cumulative, synergistic or secondary effects. Table 4.2 in Chapter 4 contains a consideration of the environmental impacts of revoking the East of England Regional Strategy.. The updated Environmental Report sets out that the national implications and effects of the plan have also been considered in the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				cumulative assessment. In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.
9	Assessment - mitigation	No mitigation measures are presented in the Environmental Reports because no impacts have been identified. Explanation and evidence should be presented to support statements in the report that 'These policies could be delivered by other means than through a Regional Strategy.' The evidence suggested that some of these policies – for instance Policy H1 on regional housing – would not be delivered by 'other means.	Levett-Therivel; Trewick Environmental Consultants; Collingwood Environmental Planning	Where significant effects have been identified appropriate mitigation measures are proposed in Chapter 4 of the updated Environmental Report, as well as in Appendix D.
10	Assessment – strategic planning	The Regional Strategies provided strategic policies to ensure that development can be planned in a way that is compatible with biodiversity targets. There are similar issues with water supply/demand, for example, under the Water Framework Directive, to	Levett-Therivel; Trewick Environmental Consultants; Collingwood Environmental Planning, TCPA	The National Planning Policy Framework, published in March 2012, states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>ensure that housing development will be compatible with the requirements for favourable status and there are knock on implications for European protected sites.</p> <p>The TCPA considered that the Environmental Reports understated the benefits of regional policy which all the original Strategic Environmental Assessments had identified. They also considered that there was insufficient detail to show how the new planning reform measures would deal effectively with strategic spatial issues.</p>		<p>area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>The impact of retaining, partially revoking and revoking the East of England Regional Strategy has been assessed in detail in the short, medium and long term in the updated Environmental Report for each of the 12 Strategic Environmental Assessment topics.</p> <p>In the updated Environmental Report it has also been considered relevant to reference the duty to co-operate for a number of Regional Strategy policies. Where this is the case, specific local examples of current</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>cooperation are also cited where available. Examples where authorities have been co-operate analogous to the duty to co-operate include the East of England Waste Technical Advisory Group, the Greater Norwich Partnership (comprising the Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council), Essex Councils are working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency to develop the Northstowe new town.</p>
11	Assessment - baseline data	<p>Statutory Agencies identified more recent environmental data than that used in the Environmental Reports - such as data used to inform the preparation of the River Basin Management Plans, and on climate change and sea level rise. Other respondents asked for other baseline data to be updated, for data on human health to be included and for data to better reflect the</p>	<p>Natural England, Environment Agency, Tweek Environmental Consultants (TEC), Clyde and Co LLP, TCPA, Levett-Therivel</p>	<p>The baseline data has been updated and expanded in the updated Environmental Report, and described for the 12 Strategic Environmental Assessment topics in Annex E. Maps have been included. This data has been used to inform the assessment the strategic environmental impacts of the revocation of the East of England Regional Strategy and a number of alternatives.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		economic climate. Some respondents asked for maps to be included to better illustrate spatial impacts.		
12	Assessment – material assets	The analysis of material assets could include the full range of infrastructure, employment sites, waste, energy and water use etc.	Levett-Therivel; Treweek Environmental Consultants	The updated Environmental Report includes an assessment of all 12 Strategic Environmental Assessment topics. This incorporates assessment of waste and minerals, energy, water use, and employment. The impact of infrastructure on the Strategic Environmental Assessment topics is considered throughout the assessment at Appendix E of the updated Environmental Report
13	Assessment – likely evolution of the environment	The likely evolution of the environment in the absence of the plan should be set out.	Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning	In compliance with Annex 1(b) of the Strategic Environmental Assessment Directive, the updated Environmental Report presents for each of the 12 Strategic Environmental Assessment topics, an assessment of the likely evolution of the baseline without implementation of the plan or programme. Uniquely (to date) in this case, “without implementation of the proposed plan or programme” actually refers to the Plan to Revoke the Regional Strategy. So the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>evolution of the environmental baseline without the plan will mean in this instance, the evolution of the baseline with the Regional Strategy remaining in place. Therefore, and where appropriate in addition to using projections, this assessment has used the findings of the relevant Sustainability Appraisals and Habitats Regulation Assessments to help provide an informed understanding of the likely future evolution of the baseline. This information is contained in Appendix E and presented within each topic chapter.</p>
14	<p>Assessment – Special Protection Areas and Special Areas of Conservation</p>	<p>Information on the existing impacts on Special Protection Areas and Special Areas of Conservation should be provided.</p>	<p>Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning</p>	<p>The updated Environmental Report contains an Appendix G listing all Special Areas of Conservation and Special Protection Areas and the impact on particular sites has been drawn out where relevant. In Appendix G there are listed 31 Special Areas of Conservation and the appendix analyses the condition of each Special Area of Conservation, and illustrates whether or not the site is in favourable condition expressed</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>in percentage terms of the geographical area covered by the Special Area of Conservation, hence Alde, Ore and Butlry Estuaries 67% of their area is in a favourable condition, whilst 94% of Wormley Hoddesdonpark Woods is in a favourable condition. Appendix G also identifies 25 Special Protection Areas and 25 Ramsar sites (as designated by the Ramsar Convention 1971) and again deploys the same methodology to assess the environmental quality of each of these designated sites.</p>
15	Assessment – method statement	Information should be provided on who has carried out the assessments, details of the consultation with statutory agencies, responses to scoping responses and what problems were faced.	Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning	Detail of the preparation of the report, consultation with the statutory agencies, responses to scoping comments, and difficulties faced with the analysis are set out in Chapters 1 and 3 and Appendix F of the updated Environmental Report.
16	Assessment – non technical summary	The non- technical summaries are not consistent with the Strategic Environmental Assessment Directive requirements. They are generic and make assertions that are not based on evidence.	Levett-Therivel; Treweek Environmental Consultants; Collingwood	A non-technical summary which is based on the findings of the assessment and consistent with the requirements of the Strategic Environmental Assessment Directive is included in the updated Environmental

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
			Environmental Planning	Report.
17	Assessment – local plans	<p>The Woodland Trust thought that the baseline information in the original Strategic Environmental Assessment of the Regional Strategy identified increasing environmental pressures arising from development. It felt these still needed to be addressed in the absence of the strategy. As a result of this, they believed there should be much more emphasis on the Strategic Environmental Assessment process for Development Plan Documents, with particular emphasis on the effect of cumulative impacts.</p> <p>The Forestry Commission (East of England) considered that there was an assumption in the report that local authorities would make the ‘right’ choices and be entirely aware of EU legislation etc. when the overwhelming driver was economic growth. Their view was that without Structure Plans, which the Regional Strategy was intended to replace, the</p>	<p>The Woodland Trust, FOE, CPRE, Professor Alan Townsend, Forestry Commission (East of England)</p>	<p>The Government agrees that Local Plans are subject, and will continue to be subject, to Strategic Environmental Assessment consistent with the requirements of the Strategic Environmental Assessment Directive.</p> <p>Local authorities' planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements including on the environment.</p> <p>The updated Environmental Report includes an analysis of the content of local plans at Appendix C, focussing on housing allocation, gypsies and traveller pitches, renewable energy, employment land, minerals and waste.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>District tier had nothing to set its plans in context with and there was no way to emphasis policies which are important in this particular region e.g. wet woodlands which are a priority habitat.</p> <p>CPRE stated that the reports should have considered appropriate evidence that currently exist, such as changes to Core Strategies made subsequent to the announcement that regional plans would be abolished. They suggested that no such assessment had been made. As a result there were no recommendations about how the plan making process might be improved to address environmental issues, for example, by strengthening the Sustainability Appraisal process at local authority level.</p> <p>FOE were concerned that the statement in the Environmental Reports that local authorities would deal with environmental issues was not based on a full analysis of</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>whether local plans do have strong local environmental policies in place similar to those in the Regional Strategies in a situation where they were specifically not supposed to duplicate regional policy; or in areas where there are no local plans. In addition, the assumption that there are 'strong protections' for the environment in national planning policy had been disputed by several NGOs.</p> <p>Professor Alan Townsend considered the reference in the reports that the removal of the Regional Strategies would create 'opportunities for securing environmental benefits' to be unfounded. Referring to the North East, as an example, he commented that the experience of CPRE was that economic and commercial pressures would act as a serious threat to a balanced approach to the environment and to development. He also referred to paragraph 1.25 in the Environmental Report where it is stated that environmental effects cannot be</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>predicted for certain because they depend on local decisions, but disagreed with the view that decisions taken locally will look to maximise positive environmental outcomes for the local area.</p> <p>The Woodland Trust also believed that the Strategic Environmental Assessment for the East of England relied heavily on local policies, but these are patchy in their coverage and often out of date. In addition the National Planning Policy Framework may undermine existing local policies, necessitating their revision.</p>		
18	Assessment – reasonable alternatives	The environmental assessment had considered too narrow a range of alternatives. The only alternative considered was no revocation. This in turn means that there are no clear recommendations to address the practical question of whether the proposed planning system, centred on the National Planning Policy Framework and local plans, should be modified to address environmental	RSPB, Wildlife and Countryside Link, CPRE, Renewable UK, Clyde and Co LLP, Irish Travellers Movement in Britain; Levett-Therivel; Treweek	The updated Environmental Report draws on the consultation responses and the findings of the assessment to develop a number of alternatives and identifies four reasonable alternatives to complete revocation for assessment.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>issues that arise from the abolition of regional planning.</p> <p>Other alternatives suggested were:</p> <ul style="list-style-type: none"> • reviewing the Regional Strategies; • revoking the Regional Strategies but saving key policies; • the retention of the Regional Strategy system with regional groupings of local authorities responsible for drafting them and adoption by the Secretary of State; • maintaining the plans and revising certain policies in order to make the plans more acceptable, as well as the possibility of local authorities producing joint development plans to cover specific issues; • revoking certain chapters or parts of the strategies and introducing transitional arrangements. 	<p>Environmental Consultants; Collingwood Environmental Planning</p>	
19	Assessment - monitoring	<p>Natural England, CPRE and TCPA considered that it was not clear whether the</p>	<p>Natural England, CPRE, TCPA, Levett-</p>	<p>Proposals for monitoring are set out in Chapter 5 of the updated Environmental</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>local authorities, Government or any other body would collate the authorities' monitoring information and assess it to determine where more than local gaps in policy or problem areas were arising.</p> <p>The TCPA suggested that there was a need to monitor the general impact of the Government's planning changes. Consistent and effective monitoring on the effects of the 'duty to co-operate' over the next 2-3 years was particularly important, for example, by tracking local plan progress on local authority websites in a systematic but simple way.</p> <p>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning suggested that the effects of revocation should be monitored, for example, to track housing completions and development on Greenbelt.</p>	<p>Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning, Clyde and Co LLP, Forestry Commission</p>	<p>Report.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Clyde and Co LLP considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p> <p>The Forestry Commission commented that the monitoring and sharing of information was far easier with the Monitoring Group established by the Regional Assembly. Local authorities were unlikely to monitor if this is not a requirement given funding constraints. The Annual Monitoring report was extremely valuable for seeing what was being achieved, and believed that it was unclear now how national targets for carbon reduction could be met. Whilst Local authorities may be responsible for monitoring: they asked who they reported to and how (a) cumulative effects or (b) actions in one authority being undermined in another could be assessed.</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
20	Reliance on the draft National Planning Policy Framework	<p>Natural England, the Environment Agency, the TCPA and CPRE noted that it was difficult to come to a view on the significance of the environmental effects of revocation, prior to the publication of the final National Planning Policy Framework and the implementation of the new “duty to co-operate”. CPRE for example, commented that as a result of the wider changes in planning it was inherently difficult to assess the likely impact of the revocation of Regional Strategies. In particular, the content of the final National Planning Policy Framework and future local plans were uncertain and neither of these statements could currently be fully tested. They expressed concern that the Environmental Reports did not give a comprehensive overview of the potential environmental impact of the Government’s intentions.</p> <p>Levett- Therivel; Treweek Environmental Consultants; Collingwood</p>	<p>Natural England, Environment Agency, TCPA CPRE, Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning, Woburn Sands and District Society</p>	<p>The National Planning Policy Framework was published in March 2012. The National Planning Policy Framework is consistent with the Government’s Natural Environment White paper, and makes it clear that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and sets out as a core planning principle that planning should recognise the intrinsic character and beauty of the countryside. The Framework also maintains protection for designated areas such as the Green Belt, Areas of Outstanding Natural Beauty, National Parks, and Sites of Special Scientific Interest. It sets out policy for the support of delivery of renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The National Planning Policy Framework is not subject to Strategic Environmental Assessment as it is high level policy and does not fall within the scope of the Strategic</p>

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		<p>Environmental Planning questioned the evidence that the National Planning Policy Framework will be so favourable to the environment or sustainable development, as the National Planning Policy Framework has not been subject to Strategic Environmental Assessment.</p> <p>The Woburn Sands and District Society were broadly supportive of the principles of the Localism Bill and the revocation of the East of England and South East Regional Strategies. They questioned the conclusion of “highly unlikely that there would be any significant adverse environmental effects resulting from the revocation” given the draft National Planning Policy Framework. They considered that the Environmental Reports did not assess the significant changes resulting from the National Planning Policy Framework which meant that the reports were fundamentally flawed. The assessment only appeared to consider the environmentally friendly aspects of the</p>		<p>Environmental Assessment Directive.</p> <p>Policies (whether regional or local) that make provision of sites for housing and employment and for net additional dwellings were identified in the Environmental Report as having significant positive effects on population and human health. The East of England Plan had a net additional target of 26,800 per annum, although housing completions in 2010/11 were significantly below this (at 17,100).</p> <p>Revoking the Regional Strategy and policy H1 and E1 is likely to affect those 23 authorities who have a pre 2008 plan, whose housing and economic policies are unlikely to meet their current objectively assessed needs. The approach taken to housing need is a matter for local planning authorities and taking into account National Planning Policy Framework policies.</p> <p>In the updated Environmental Report it has also been considered relevant to reference</p>

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		<p>draft National Planning Policy Framework while ignoring those which would have a significant and material adverse impact on the environment.</p> <p>Natural England agreed with the assessment that there was an inherent difficulty in providing an assessment of the National Planning Policy Framework as an alternative, as it was not known how the final version would differ from the consultation draft.</p> <p>Scottish Power Renewables were of the view that the Regional Strategies have a key role in ensuring that national policy objectives are met and encouraged the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the regional plans do and could continue to play a key role in the strategic planning of onshore wind and the infrastructure to support the development of</p>		<p>the duty to co-operate for a number of Regional Strategy policies. Where this is the case, specific local examples of current cooperation are also cited where available. Examples where authorities have been co-operate analogous to the duty to co-operate include the East of England Waste Technical Advisory Group, the Greater Norwich Partnership (comprising the Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council), Essex Councils are working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency to develop the Northstowe new town.</p>

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		<p>offshore wind. They were therefore concerned that the process for the revocation of Regional Strategies pre-empted the final National Planning Policy Framework and requested that the Government require local authorities to put in place policies to ensure a contribution to the national renewable energy targets, in line with the National Policy Statement.</p> <p>RenewableUK shared the concern about the reliance on the draft National Planning Policy Framework and were concerned that the draft National Planning Policy Framework did not contain a sufficient level of detail to support renewable energy planning.</p> <p>The RSPB and Wildlife Link considered it misleading for the Environmental Reports to imply that the planning reform would usher in new policies that, on balance, would make up for the loss of Regional Strategies. They considered, for example, that even</p>		

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		<p>though 'top-down' housing targets were being removed, the stated purpose of planning reform was to create more growth and to deliver more housing. There was no criticism of Regional Strategy housing figures being too high, only that they were 'top-down'. It therefore followed that local authorities would use similar methodologies and arrive at similar figures when 'objectively assessing' housing need.</p> <p>FOE stated that local authorities will have to be guided by the policies in the National Planning Policy Framework. Based on the draft National Planning Policy Framework text, in many cases, local authorities will struggle to take decisions on a 'local' basis to protect the environment. They stated that legal advice obtained by them showed that the concept of local decision-making was outweighed by the wording used in the draft National Planning Policy Framework which is directive on the need to approve development. They also pointed to</p>		

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		<p>shortcomings in the draft National Planning Policy Framework on sustainable development, countryside and biodiversity, transport, water, and climate change mitigation and adaptation.</p> <p>The Wildlife and Countryside Link were concerned that the Environmental Reports relied so heavily on the draft National Planning Policy Framework, which had not been finalised and was therefore subject to change.</p> <p>The Theatres Trust suggested that suitable policy within the National Planning Policy Framework and other measures needed to be in place to ensure the pooling of knowledge on physical and social cultural infrastructure, particularly theatres, if the plans are revoked.</p> <p>The Woodland Trust in their response to the revocation of the East of England Regional Strategy, thought it impossible to assess the impact of the loss of the</p>		

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		<p>Regional Strategy without being able to assess it against the National Planning Policy Framework. They also commented that the Strategic Environmental Assessment implies that the National Planning Policy Framework and planning reform in general will lead to less development, particularly in the absence 'top down targets', but felt this is contradictory to the Government's policy, as the stated purpose of the current planning reforms is to encourage economic growth. Paragraph 1.6 of the Environmental Report states that the National Planning Policy Framework sits within the broader context of national policy and legislation such as the National Environment White Paper (NEWP). The draft National Planning Policy Framework did not however reflect the NEWP.</p>		
21	Assessment - policy change	<p>Natural England noted that the revocation of the Regional Strategies would require local planning authorities to incorporate relevant environmental policies, previously</p>	<p>Natural England, The Environment Agency, RSPB, Wildlife and</p>	<p>The National Planning Policy Framework, published in March 2012, sets out the Government's planning policies for England.</p>

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		<p>included in the Regional Strategy, into their local plans or to rely on National Planning Policy Framework policies. The full effect of revoking individual Regional Strategy policies was therefore likely to depend greatly on where individual local authorities were in their local plan-making process. Where local authorities had not yet adopted core strategies, in the absence of regional strategies, they considered that it may be much more difficult for them to develop locally tailored evidence-based policies.</p> <p>The Environment Agency welcomed the Environmental Report highlighting which parts of current national policy and guidance were important to help avoid significant adverse environmental impacts. Where local authorities had adopted Core Strategies that were developed with a backdrop of the Regional Strategy, a robust National Planning Policy Framework would need to ensure that any potential policy gaps were filled.</p>	<p>Countryside Link, Theatres Trust, RenewableUK, FOE</p>	<p>The National Planning Policy Framework emphasises the need for local planning authorities to plan strategically. The National Planning Policy Framework states that local planning authorities should set out their strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>The National Planning Policy Framework also makes clear that, where it would be appropriate and assist the process of preparing or amending Local Plans, Regional</p>

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		<p>The RSPB proposed that the Government should not revoke the Regional Strategies in full. They suggested that saving key environmental policies until they were replaced by equivalent local plan policies would significantly mitigate the risk of environmental harm. Saved policies should be kept in place during a transitional period while local plans were updated, which could easily coincide with the transitional period in which the National Planning Policy Framework was translated into local plans.</p> <p>The Wildlife and Countryside Link suggested that Government and its agencies should work together with local authorities and their partners in each region to identify which Regional Strategy policies should be saved, while local plans were updated to incorporate those policies.</p> <p>The RSPB and the Wildlife and Countryside Link considered that</p>		<p>Strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of Regional Strategies to support their Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>Delivery of plans is increasing: – across the East of England region 6 councils have adopted Local Plans since May 2011, compared with 19 councils that had adopted local plans over the previous 7 years. 52% of councils have a plan adopted post-2004. And overall 68% of councils now have a published plan. Appendix C of the updated Environmental Report sets out more details on existing adopted Local Plans and saved policies.</p> <p>The Localism Act 2011 has complemented the powers to remove regional strategies with a new statutory duty to co-operate. The duty to co-operate requires local councils and other public bodies to work together actively, constructively and on an ongoing basis when</p>

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		<p>revocation would remove a raft of policies on issues, such as those on the natural environment and renewable energy, that were largely not contentious, and the product of close cooperation between local authorities and other interested parties.</p> <p>The Theatres Trust stated that the proposed revocation of the Regional Strategies could have adverse social effects. The Regional Strategies included measures for local authorities to work collaboratively 'to increase investment in physical and social infrastructure'. This may not take place on such a scale, even with the duty to co-operate, if Regional Strategies are revoked. The Theatres Trust believes that this would have ensured that cultural facilities were in place for communities to share and that places exchange knowledge when creating new buildings or networks, so that resources were not squandered by the repetition of mistakes. Thus, it was suggested that</p>		<p>planning for strategic matters in local and marine plans.</p> <p>Climate change is one of the core land use planning principles which the National Planning Policy Framework expects should underpin both plan-making and decision-taking. Local planning authorities are expected to adopt proactive strategies to mitigate climate change and co-operate to deliver strategic outcomes which include climate change. They should plan for new development in locations and ways which reduce greenhouse gas emissions (including through transport solutions which support reductions in greenhouse gas emissions); actively support energy efficiency improvements to existing buildings; and promote energy from renewable and low carbon sources. These strategies are expected (paragraph 94 of the National Planning Policy Framework) to be in line with the objectives and provisions of the Climate Change Act 2008. There is a legal requirement on local planning authorities to ensure their Local Plan (taken as a whole)</p>

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		<p>measures needed to be in place to ensure the pooling of knowledge on physical and cultural infrastructure, which also affect theatres, if the Regional Strategy is revoked.</p> <p>RenewableUK were of the view that the revocation of the Regional Strategies would create a policy gap which would affect the ability of local authorities to make informed decisions. They did not believe that a reliance on national policy and the duty to co-operate was sufficient to ensure that the UK met its renewable energy generation and carbon emissions reduction targets.</p> <p>FOE were concerned that the Strategic Environmental Assessment of the revocation of the Regional Strategies do not fully assess the environmental impacts of the incoherent policy context that would arise. They recommended that to fill the gap left by the Regional Strategies, local plans should absorb the regional evidence bases</p>		<p>includes policies designed to tackle climate change and its impact. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.</p>

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		<p>for renewable energy resources, and 'save' renewable energy target and adaptation policies where this would otherwise leave a gap in local frameworks. They added that the loss of the Regional Strategy left a gap in the consideration of the global impacts of a local authority's areas consumption/ indirect impacts. They were of the view that the footprint approach at a regional level specifically aimed to counter a strictly localist approach of local authorities. They were concerned that local authority plans would only consider local resource management and the whole footprint approach would be lost. They considered it essential that the evidence base section of the draft National Planning Policy Framework was revised to include the concept of foot printing to acknowledge the burden of resource use within a local authority on other areas. They therefore recommended that local authorities 'save' relevant policies where this would plug a gap in their existing local planning framework until the next appropriate review</p>		

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		date; and the Department for Communities and Local Government should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary co-operation.		
22	Reliance on the duty to co-operate	<p>Natural England and the Environment Agency welcomed the emphasis given to cross boundary working which could potentially promote partnership working and offer a more strategic approach to spatial planning. However, both organisations commented that the Environmental Reports did not identify how the duty to co-operate would work in practice or replace the co-ordination provided by the regional strategies and the various working groups that existed within this structure. Natural England also considered that there was too much reliance on the assumption that local planning authorities would continue to work together on strategic issues under the duty to co-operate. It was noted that the Duty would not apply to private sector companies who provide public services such as water</p>	<p>Natural England Environment Agency, English Heritage, RSPB, RenewableUK TCPA, FOE, Clyde and Co LLP, Professor Alan Townsend, CPRE, Luton Borough Council, Hertfordshire County Council.</p>	<p>The Government recognises the importance of strategic planning. The National Planning Policy Framework, published in March 2012, makes clear that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p>

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		<p>and sewerage, energy and telecommunications, many of which would have a key role to play in infrastructure planning. The Environment Agency stated that common intelligence and joint working arrangements were needed between partner local authorities and other key organisations to develop an integrated approach to planning.</p> <p>The Environment Agency referring to the duty to co-operate accepted that local authorities would work with adjacent councils, but not at a range of scales including a catchment scale. They considered that this was important as building development at the top of a catchment could increase run-off and cause flooding many miles downstream. They suggested that this is recognised so that the duty to co-operate could fully support strategic planning at a local level.</p> <p>Natural England accepted that it was</p>		<p>Many councils are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans. Examples where authorities have been co-operating analogous to the duty to co-operate include the East of England Waste Technical Advisory Group, the Greater Norwich Partnership (comprising the Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council), Essex Councils are working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency to develop the</p>

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		<p>possible that cross-boundary impacts may be assessed between adjoining authorities, but were unclear how the cumulative impacts of multiple authorities' plans would be assessed to take into account issues occurring within broader environmental boundaries, such as water catchments. Both the Environment Agency and Natural England sought further clarification on mechanisms which could be employed to ensure that likely cumulative, in-combination and cross-boundary environmental impacts, are identified, assessed and monitored as part of the Local Plan process and duty to co-operate.</p> <p>English Heritage noted how critical it was that the duty to co-operate was taken forward by local authorities and public bodies to ensure that the strategic planning issues are successfully addressed, based on a shared understanding of local needs and the wider context. However, they saw a danger that the wider perspective gained</p>		<p>Northstowe new town.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be</p>

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		<p>through strategic planning would be lost. They suggested that the National Planning Policy Framework and any guidance issued to support it; may assist with this by encouraging strategic analysis through sub-national partnerships in appropriate circumstances.</p> <p>While the RSPB welcomed the strengthening of the duty to co-operate during its Parliamentary passage, they remained sceptical that the duty would deliver contentious forms of development where it is needed or effective strategic planning for the natural environment. They were concerned by the unsubstantiated assumption that the duty to co-operate would overcome the strategic vacuum left by the revocation of the Regional Strategies. They stated, as an example, that there was no recognition of the shortcomings caused by having multiple plans being developed over multiple time and spatial scales, and the difficulties this</p>		<p>deliverable and as such they may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The bodies, which are prescribed in local plan regulations, are:</p> <ul style="list-style-type: none"> • the Environment Agency;

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		<p>would cause in terms of assessing the cumulative impacts of development.</p> <p>RenewableUK also expressed the view that the duty to co-operate provisions in the Localism Act appear weak, with no clear means of ensuring that local authorities would co-operate productively. They considered that a lack of strategic action on mitigation and adaptation to climate change was likely to result in significant and unpredictable effects on biodiversity, flora and fauna. Other elements, such as population, human health etc. would also be adversely affected.</p> <p>The TCPA indicated that it had made clear that the duty to co-operate had a range of significant limitations - having a narrow remit, a retrospective sanction and no defined or specific outcomes. They considered that even where joint cooperation was enthusiastically entered into by local authorities the nature of</p>		<ul style="list-style-type: none"> • the Historic Buildings and Monuments Commission for England; • Natural England; • the Mayor of London; • the Civil Aviation Authority; • the Homes and Communities Agency; • Primary Care Trusts; • Marine Management Organisation • Office for Rail Regulation • the Highways Agency; • Transport for London; • Integrated Transport Authorities; and • Highway authorities <p>The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning</p>

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		<p>cooperation would be on a smaller spatial scale and with a tighter remit and much less resource than the statutory Regional Strategy process. They considered that this may lead to increased environmental impacts and may limit effective responses on renewable energy and catchment scale or coastal flood risk.</p> <p>FOE considered that revocation would leave a gap in both planning policy on environmental issues and in a regional understanding of them. They considered that the duty to co-operate was unlikely to provide an effective response to the wider pattern of unsustainable pressures and growing regional inequalities in England. They suggested that the duty does not require co-operation on any specific issues. Issues which are by their nature spatial and cross-boundary, for example, river basin management, flood risk, green infrastructure, and transport, would suffer from the removal of the Regional Strategy.</p>		<p>Policy Framework states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

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		<p>While, for example, river basin management plans are developed by the Environment Agency, local authorities and others, the context for local decision-making on planning applications will still lack regional spatial awareness of the larger than local and cumulative impacts of decisions. This will lead in many cases to poor planning, and increased negative environmental impacts. They were concerned that there are no sanctions for local authorities who fail to co-operate, while local authorities who have failed to persuade neighbouring authorities to co-operate would suffer if the Inspector judged their plan to be unsound as a result.</p> <p>Clyde and Co LLP considered that it was not adequate to base the environmental assessment on the expectation that authorities would co-operate. It was therefore inappropriate for the assessment of likely effects, as encapsulated within the Environmental Reports, to be predicated on</p>		

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		<p>that basis.</p> <p>Another consultee (Professor Alan Townsend) suggested that a number of policy areas would be under threat from relying on the duty to co-operate, such as, climate change, river flooding, Areas of Outstanding Natural Beauty, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing. Hives Planning Ltd commented that the Localism Act did not set out any sanctions if local authorities did not co-operate.</p> <p>CPRE were concerned that the assessment for the East of England Regional Strategy did not address the question of how the effective removal of strategic planning will impact upon the environment. The assessment admitted that the goal of cross boundary cooperation is merely 'an expectation'. While there is indeed a 'duty to co-operate' included within the Localism</p>		

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		<p>Act it remains to be seen the extent to which this duty will, in practice, encourage or oblige local authorities to work together; particularly on environmental issues. CPRE specifically highlighted that in the East of England there are a range of issues where cross boundary working is needed to deliver the optimum environmental outputs. For example, in areas such as transport, water and wildlife fragmentation it is self-evident that such cooperation is often essential. They had serious reservations as to whether this cooperation will properly take place given the removal of the primary mechanism to achieve it.</p> <p>Luton Borough Council commented in their response to the assessment of the East of England Regional Strategy that it is an approved spatial strategy, which prioritises and balances the risks of development and the relative degree and importance of environmental harm across the region, yet the Environmental Report</p>		

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		<p>failed to recognise potential environmental damage in the 'vacuum' created by withdrawal of the Regional Strategy where harm cannot be traded off across the region from a purely local or non strategic perspective, and also the inevitable delay until there is a full coverage of local plans – which may take many years to achieve. They also felt that the Environmental Report should have addressed the lack of a mechanism for agreeing the needs of the wider region between different local authorities, and there was a lack of strategic direction or cohesion with an absence of growth or environmental targets in the Environmental Report with which to test the Government's approach, making it vague.</p> <p>Hertfordshire County Council also commented that the emerging legislative and policy framework being put in place by Government seeks to ensure that local authorities work together to identify and seek resolution to cross-boundary issues</p>		

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		<p>under the duty to co-operate. However, they thought that the Environmental Report seemed to take the view that the duty to co-operate will enable local authorities to come together to perform the same kind of regional, sub-regional and cross-local authority decision-making as the Regional Strategy does. The Council disagreed with this position and felt that it is highly unlikely given the geographic coverage of local authorities and the political hurdles that would inevitably prevail. As a consequence there will be a vacuum in strategic decision-making which will run counter to the findings of the 2004 Strategic Environmental Assessment of the draft Regional Strategy.</p>		
23	Individual Topics- Access to Data	<p>Referring to the comment in the Environmental Reports that local authorities can continue to draw on available information, including data from partners, to address cross-boundary issues, it was not clear whether data previously collated as</p>	TCPA	<p>The National Planning Policy Framework, published in March 2012 makes it clear that local planning authorities may also continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed</p>

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		part of the Regional Strategy preparation process would remain up-to-date, or whether coordinated monitoring mechanisms would continue to exist in the future		by up -to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.
24	Individual Topics- Green Belt	<p>JC Consultants considered that the Environmental Report misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p> <p>Hives Planning Ltd suggested that the comment that there would be less pressure to review Green Belt boundaries in order to accommodate necessary growth, resulting in lower environmental impacts, was misleading. They added that Green Belt</p>	<p>JC Consultants, Hives Planning Ltd, CRPE, Stevenage Borough Council, Hertfordshire County Council, English Heritage</p>	<p>The National Planning Policy Framework, published in March 2012, makes it clear that the Government attaches great importance to Green Belts, and overall that the planning system should recognise the intrinsic character and beauty of the countryside. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another;

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		<p>boundaries were established many years ago and it was clearly recognised in policy documents in the last decade that Green Belt boundaries must be reviewed in order to accommodate the inevitable need for housing.</p> <p>CPRE commented on the statement in the Environmental Report that “the revocation of top-down housing targets will remove pressure to review Green Belt to accommodate growth” and that it is now up to local authorities to review their Green Belt boundaries. They felt the assertion that the Green Belt would be ‘safer’, was debatable. They took the view that this was based on the National Planning Policy Framework making clear that a key objective of the planning system is to increase significantly the delivery of new homes; and therefore the tenor of wider Government policy (for example the New Homes Bonus) is that local authorities will be under greater pressure than before to</p>		<ul style="list-style-type: none"> • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or</p>

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		<p>provide new housing. Local authorities would therefore be obliged to “maintain a rolling supply of deliverable sites sufficient to provide five years worth of housingthe supply should include an additional allowance of at least 20%...” (draft National Planning Policy Framework, clause109).</p> <p>CPRE felt that given the difficulties many local authorities in the region had in identifying sufficient land for existing housing requirements it was hard to see how the threats to Green Belt and greenfield land could be anything other than increased.</p> <p>CPRE were also concerned that there would be more revisions to Green Belt boundaries by local authorities as a result of this pressure. They provided the example of the Cambridge Green Belt, which had seen a net decrease of 70 hectares in South Cambridgeshire between 1 April 2009 and 31 March 2010. CPRE believed this could</p>		<p>major urban extensions.</p> <p>If proposing a new Green Belt, local planning authorities should: demonstrate why normal planning and development management policies would not be adequate; set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; show what the consequences of the proposal would be for sustainable development; demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and show how the Green Belt would meet the other objectives of the National Planning Policy Framework</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The National Planning Policy Framework also states that once established, Green Belt boundaries should only be altered</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>be replicated elsewhere in the region, for instance the possible growth of Luton posed a real threat to the South Bedfordshire Green Belt – particularly if the objectives to redevelop brownfield land were not in place. They pointed out that the Environmental Report repeated on a number of occasions that the National Planning Policy Framework would protect the Green Belt, yet, in the East of England, there is no Green Belt in Norfolk or Suffolk and only a minority of other protected landscapes. For example, as the Environmental Report stated at paragraph 3.17, only 7.5% of the land area is designated as nationally important landscape. CPRE believed this would mean that undesignated landscape in the East of England was under greater threat than before.</p> <p>Stevenage Borough Council was also concerned with the pressure on the Green Belt in Stevenage. Stevenage is important, both in a regional and sub-regional context</p>		<p>in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green belt are also included.</p>

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		<p>as a key centre for growth, a priority regeneration area, a place where the Green Belt boundary should be reviewed, and a place for strategic employment and major housing growth. The Council were of the view that it was inevitable that the abolition of all these policies through revocation of the East of England Regional Strategy would significantly affect Stevenage and neighbouring areas, especially North Hertfordshire District. They pointed to the fact that previous assessments for the introduction of the Regional Strategies had considered these impacts, but the revocation Environmental Report made no reference to changes that would occur in Stevenage or the wider Stevenage area covered by East of England Regional Strategy Policy SV1.</p> <p>Hertfordshire County Council raised similar concerns. They highlighted that one of the main roles of a Regional Strategy was to make judgements about how growth</p>		<p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they</p>

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		<p>should be distributed on a regional, sub-regional and individual local authority scale – taking into account all sorts of opportunities, constraints and aspirations. For example, in the London Arc, within which part of Hertfordshire lies, the Regional Strategy makes a conscious spatial decision to retain long-standing Green Belt restraint (Policy LA1), with the exception of Hemel Hempstead, Hatfield and Welwyn Garden City, where strategic scale growth and Green Belt release is required.</p> <p>English Heritage also raised concerns regarding revocation of Policy CSR3 (Green Belt) in the East of England Regional Strategy. It related to the Cambridge Green Belt and its purpose of preserving the character and setting of Cambridge as an historic city, which was based on earlier Policy P9/2a in the Cambridgeshire Structure Plan. They also referred to a further two saved Structure Plan policies</p>		<p>preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the National Planning Policy Framework clearly state that when local planning authorities are ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, this is consistent with the policies set out in the National Planning Policy Framework, including policies on the protection of Green Belts.</p> <p>In addition, the presumption in favour of sustainable development makes a clear reference to Green Belts when it lists policies</p>

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		<p>which related to the Cambridge Green Belt. They explained that the Cambridge Green Belt was originally justified and designated at national level in recognition of the city's historic importance and the need to protect the character of the city. In their view, the designation is a matter of both local and national interest. Removal of the Regional Strategy and saved Structure Plan policies would result in loss of strategic policy content identifying the importance of the Cambridge Green Belt. This may then result in a gradual, but significant, reduction in the protection it provides. They considered that the report conclusions on this policy should recognise the gap created by this.</p>		<p>in the National Planning Policy Framework that indicate that development should be restricted.</p> <p>The policies set out on the Cambridge Green Belt are repeated in the Local Plan for Cambridge and as such revocation of the Regional Strategy would not change the status of the Green Belt around Cambridge.</p> <p>As for open land which forms a landscape which is undesignated, not located in the Green Belt or designated as an Area of Outstanding Natural Beauty (ANOB), the National Planning Policy Framework at para 17 of the Core planning principles states that when local planning authorities are taking planning management decisions or preparing local plans they will recognise the intrinsic character and beauty of the countryside, which also includes countryside which has no formal designation.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
25	Individual Topics- Gypsies and Travellers	The Garden Court Chambers Gypsy & Traveller Team considered that the revocation of Regional Strategies would have a detrimental effect upon the provision of sites for Gypsies and Travellers. They considered that the view in the Environmental Reports that sufficient sites would be delivered by local authorities without regional or national supervision was misconceived. They were therefore disappointed that consideration had not been given to the alternative option of retaining those regional policies relating to the provision of sites for Gypsies and Travellers. Community Law Partnership supported these comments and added that revocation would lead to a decrease in the provision of new sites which would have an inevitable result in the numbers of Gypsies and Travellers on unauthorised encampments and unauthorised developments increasing. Friends, Families and Travellers also supported these	The Garden Court Chambers Gypsy & Traveller Team, Community Law Partnership, Friends, Families and Travellers, National Federation of Gypsy Liaison Groups	<p>It is the Government's view that Local authorities are best placed to understand the needs of their communities. The Government has produced new planning policy for traveller sites that reflects this. The Traveller policy published in March 2012⁶ makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community.</p> <p>Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust</p>

⁶ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

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		<p>comments and stated that they objected most strongly to the proposals to abolish Regional Strategies and, at the very least, considered that an option which retains a regional perspective should be retained for the provision of Gypsy and Traveller sites.</p> <p>The National Federation of Gypsy Liaison Groups also disagreed with the conclusions in the Environmental Reports that revocation was unlikely to have any significant environmental effect on human health, population, cultural heritage or the historic environment. The revocation of policies relating to the provision for Gypsies, Travellers and Travelling Showpeople, would have a significant impact as a direct result of the fact that without a regional framework, local authorities were likely to, and already were, including reduced pitch numbers in their Development Plan Documents. The resulting lack of suitable accommodation was directly related to poor health and</p>		<p>evidence of need that will be tested at the Local Plan examination.</p> <p>This includes:</p> <p>(i) identifying and updating annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;</p> <p>(ii) identifying a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;</p> <p>(iii) considering the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.</p>

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		<p>lower life expectancy, difficulty in accessing education opportunities, which contributed to poor living conditions, for example, on unauthorised sites. Unauthorised sites also impacted on the environment, for example if they were not suitably located there could be local impacts on the landscape.</p>		<p>The duty to co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.</p> <p>Information on Local Plan provision for pitches is shown in Appendix C of the updated Environmental Report, where it is available. Given the different stages of plan-making it is difficult to identify trends in policy development from this information. However, the proposal to abolish Regional Strategies is part of a wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				councillors on their leadership role in site provision.
26	Individual Topics– Housing Supply	<p>The TCPA referred to the statement in the Environmental Report that under the regional strategies the overall direction was expected to be a widening gap between housing provision in the strategy and the level of need. They considered that the assertion that local authorities planning for housing to reflect "the needs of their communities" would achieve this level was completely unsupported. The text asserts that "where drivers of growth are local, decisions should be made locally", but the new system failed to identify any mechanisms equivalent to the national growth areas or new growth points for accommodating in-migrants. They considered this to be a key issue in the region, the most economically buoyant in the country outside London.</p> <p>CPRE believed that the Government's continued policy of not allowing local</p>	TCPA, CPRE, Persimmon Homes, Hives Planning Ltd	<p>The National Planning Policy Framework, published in March 2012, and the duty to co-operate address this issue. The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>authorities to include windfalls in their housing allowance (except in very prescribed circumstances) would, in practice, lead to an inevitable allocation of more greenfield sites.</p> <p>Persimmon Homes also commented that the Environmental Report had not evaluated the impact upon the local population in relation to new housing in the East of England to address a growing and ageing population. They took the view that the Environmental Report did not contain a substantive assessment to explain how appropriate levels of housing could be achieved without the type of guidance presently provided in Policy H1. They felt that local authorities within the region would utilise the revocation of the Regional Strategies to reduce the housing requirement for their areas.</p> <p>Hives Planning Ltd on behalf of Arnold White Estates Ltd suggested that the</p>		<p>As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Examples where authorities have been co-operating analogous to the duty to co-operate include Essex Councils working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency to develop the Northstowe new town.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound.</p>

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		<p>assessment should have considered the socio-economic impacts of removing the regional planning framework on the provision of jobs and houses. They saw advantages of dealing with this regionally and the finding that “the pattern of development which the Regional Spatial Strategy seeks to encourage should make the region’s environment, and quality of life for its residents, much better than would be case without it” had not been addressed in the Reports. They also considered that the assessment should have looked at the impact of revocation on the delivery of housing, employment and infrastructure against wider identified needs through objective study, rather than needs identified by local authorities who may be more resistant to growth. They commented that Regional Assemblies were mainly composed of local authority representatives who were able to take a strategic planning overview above the tier and interests of the individual local authority.</p>		<p>The National Planning Policy Framework states that Local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
27	Individual Topics- Heritage	<p>English Heritage raised concerns in relation to Policy ENV6 (Historic Environment). They pointed out that this policy reflected national policy, and also identified aspects of the character of the East of England that are especially distinctive. These distinctive themes, or significant characteristics, had not been encapsulated within specific designated assets. In many cases they reflected the collective significance of both designated and undesignated assets within a strategic context. English Heritage believed the policy had had a useful role in highlighting the wider significance of heritage assets and providing a platform for their treatment in Local Development Documents. Referring to Policy ENV6 they suggested that the policy content may be covered through local authorities working together and liaison with English Heritage. If mitigation for loss of the regional historic environment policy required greater</p>	<p>English Heritage</p>	<p>The National Planning Policy Framework continues to provide protection for heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, that have a degree of significance meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.</p> <p>The National Planning Policy Framework includes as one of its core planning principles that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or</p>

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		<p>engagement, and potentially research from English Heritage, this should be included in the report's recommendations. They also thought it should be recognised that the content of Policy ENV6 had not necessarily been reflected in Local Development Documents since PPS12 has discouraged overlap in policy coverage between plans at different levels, and the potential policy gap in Local Development Documents could be examined in forthcoming reviews.</p> <p>English Heritage were also concerned about the loss of the strategic analysis of the distinctive characteristics of the historic environment in each region, which they considered could often only be identified at a greater than local level. They were also concerned about gaps left by the abolition of regional level historic environment policies. They suggested that this should be considered urgently within Local Plan reviews.</p>		<p>other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.</p> <p>In developing their strategy, local planning authorities should take into account: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.</p> <p>The strategy in a Local Plan can identify heritage assets of local and more than local importance, including those of national and international importance.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
28	Individual Topics - Waste	<p>The Environment Agency commented that the assessment of waste policies was quite comprehensive, but they were concerned with the second sentence in the last paragraph on page 61 of the Environmental Report which stated that, “local waste authorities already work together, and with other bodies, on strategic issues that cross local authority boundaries and may work together to produce joint waste plans if they wish”. As waste plans are currently produced at county and unitary level, they questioned whether the Government was suggesting wider than county waste plans. If that was the case, they recommended that further details are provided on how this will be applied.</p> <p>The Woodland Trust commented that the draft National Planning Policy Framework had stated that waste would be considered in a National Waste Management Plan. No date has yet to be given for the publication of this plan. Therefore there will be a lack of</p>	Environment Agency, Woodland Trust	<p>Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst the Planning and Compulsory Purchase Act 2004 provides for two or more local planning authorities to prepare joint local plans either through joint working under Section 28 or through the establishment of a joint committee under Section 29. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework including for the planning of waste infrastructure.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies,</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		environmental protection in the interim which has not been accounted for.		supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National Planning Policy Framework (paragraph 156) states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for waste and its ability to meet forecast demands. Further PPS10 The Waste Planning Policy Statement will remain in place until the National Waste Management Plan is published. Appendix C of the updated Environmental Report illustrates the progress that local authorities have made in the East of England to prepare Waste Management Plans.
29	Individual Topics- Biodiversity	On the basis of the content of the consultation draft of the National Planning Policy Framework, Natural England disagreed with the statement in Section 1.2 of the Environmental Reports that the	Natural England, Woodland Trust, Scottish Natural Heritage and the	The National Planning Policy Framework was published in March 2012. The finalised version makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provide net gains in biodiversity where

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		<p>National Planning Policy Framework “maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl and preserve wildlife”.</p> <p>The Woodland Trust highlighted how in ‘Making Space for Nature’ Lawton set out that planning at different geographical scales was vital to inform conservation decisions. It also sets out that planning is pivotal in maximising the contributions of the existing network and ensuring that new components are sited in effective locations. The Trust believed that ‘Nature Improvement Areas’ recommended by Lawton would be very difficult to implement without the Regional Strategy in place.</p> <p>Scottish Natural Heritage suggested that the Environmental Reports should address</p>	<p>Environment Agency.</p>	<p>possible, and contribute to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures. Appendix E of the updated Environmental Report sets out the collated contextual and baseline information, on a topic-by-topic basis, for each of the 10 assessment topics including biodiversity. Table 4.2 of the post adoption statement also sets out how Nature Improvement Areas provide cross-boundary projects where partners’ work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The initial 12 NIAs include the Nene Valley and Greater Thames Marshes.</p> <p>The National Planning Policy Framework also states that local plans contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</p> <p>The National Planning Policy Framework also asks that, in order to minimise impacts on</p>

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		<p>the protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the Environmental Reports if they identified a framework for establishing networks of green infrastructure across all the regions of England, with the potential to link with Wales and Scotland, rather than just to propose partnerships across local authority boundaries.</p> <p>The Environment Agency suggested that for the East of England region the significance of new emerging initiatives set out in the Natural Environment White Paper, such as Local Nature Partnerships (LNPs) and Nature Improvement Areas (NIAs) should be highlighted. The overall purpose of LNPs is to bring a diverse range of individuals, businesses and organisations together at a local level to create a vision and plan of action for how the natural environment can be taken into account in</p>		<p>biodiversity and geodiversity, planning policies should: plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.</p> <p>The National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships (a number of which exist in the East of England) to assess existing and potential components of ecological networks.</p>

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		<p>decision making. In the absence of regional policies, LNPs and NIAs could offer a good opportunity to strengthen local action, enable local leadership and operate across administrative boundaries.</p>		
30	Individual Topics- Renewable Energy	<p>RenewableUK were concerned that the Strategic Environmental Assessment process failed to fully account for the impact that the removal of the Regional Strategies would have on the ability of local authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of generating 15% of all energy from renewables by 2020. Overall, they suggested that there will be significant environmental effects of revoking the regional plans, if guidance and support for renewable energy development was not strengthened. Under existing proposals, the key mechanisms for strategic planning and renewable energy would be lost.</p>	RenewableUK	<p>The National Planning Policy Framework, published in March 2012, includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p>

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		<p>CPRE commented that the Regional Strategy included significant detail on the issue of climate change and formulated a number of policies to help to address it (for example ENG1: Carbon Dioxide and Energy Performance). CPRE were concerned that the breadth and detail of these policies will be lost.</p>		<p>The National Planning Policy Framework contains a number of policies aimed at encouraging the development of renewable energy development including that local planning authorities should : have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.</p>

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				In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.
31	Individual Topics- Transport	FOE considered that the removal of the Regional Strategies would in some cases have a negative environmental effect as their transport policies were stronger than those presented in the draft National Planning Policy Framework.	FOE	The National Planning Policy Framework, published in March 2012, includes a number of core planning principles. These include the need to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The National Planning Policy Framework makes it clear that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans,

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				<p>local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. The National Planning Policy Framework also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.</p> <p>The National Planning Policy Framework is clear that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also says that planning policies</p>

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				<p>should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>
32	Individual Topics - Water	<p>The Environment Agency commented that water resources are one of the main issues of concern for the region, which is the driest in England, and drew attention to the fact that parts of the East of England are currently in a state of drought, with 2011 being the 3rd driest 12 month period since records began in 1910. They welcomed the reference to the Water Framework Directive (WFD) and drew attention to the fact that the Water Framework Directive is one of their top priorities and it gives them an opportunity to plan and provide a better water environment. They therefore would like the importance of the WFD to be recognised in the final National Planning Policy Framework.</p>	<p>Environment Agency, Woodland Trust, CPRE</p>	<p>The National Planning Policy Framework, which was published in March 2012, is clear that local planning authorities should work with other bodies to assess the capacity of water supply infrastructure, and should set out in the Local Plan their strategic priorities and policies for the provision of such infrastructure.</p> <p>More generally the National Planning Policy Framework tells local planning authorities to adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where</p>

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		<p>The Woodland Trust commented that the Environmental Report failed to recognise that environmental issues are not static. For example, water quality and demand on water required strategic policies that the Regional Strategy set out. They considered that issues such as sea level rise and flooding could only be approached strategically; incremental approaches by different local planning authorities could never be truly effective in tackling such a threat.</p> <p>CPRE also commented that the Environmental Report had identified water as being a major issue in the East of England. There were significant problems regarding the region's rivers and large areas of the region were at risk from coastal and/or fluvial flooding. They noted that the Environmental Report detailed that joint and partnership working between the Environment Agency, water utilities and local authorities is contemplated in the new</p>		<p>appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant EU obligations – which include, for example, obligations under the Water Framework Directive.</p>

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		<p>duty to co-operate and the Water Framework Directive and the Flood and Water Management Act 2010 would continue to apply. However they were concerned that - particularly with development planning - there was an absence of mechanisms for local authorities to work together and with other agencies/utilities on these issues. For example, housing provision Policy H1 recognised the need to take account of water supply and waste infrastructure requirements when bringing forward land for housing.</p>		
33	Individual Topics- Brownfield land	<p>CPRE and the EEEF noted that the Environmental Report set out a number of environmental issues of strategic significance affecting the East of England, which were linked by the common thread of population growth. They pointed out that this part of England is experiencing rapid levels of population growth; a trend that shows no sign of abating and which is</p>	CPRE, EEEF	<p>The National Planning Policy Framework was published in March 2012. One of the 12 planning principles set out in the National Planning Policy Framework is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The National Planning Policy Framework makes it</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>frequently exacerbating environmental problems from habitat fragmentation to climate change. CPRE acknowledged that the Environmental Report had noted that, for instance, 69% of all journeys in the region were made by car, in some areas water use already exceeded sustainable abstraction limits and there was a recognised threat of increased urbanization. However, they argued that while the East of England Regional Strategy promoted an unsustainable level of growth, at the same time it did include a number of helpful environmental policies. Thus it emphasized the need to re-use previously developed land; for example in its Policy SS2 which set a target that 60% of development should be on previously developed land.</p> <p>CPRE's position was that revocation, combined with the Government's wider reforms to the planning system, had seen the abandonment of policies aimed at making re-use of previously developed land</p>		<p>clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111).</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>a priority. They submitted that this was likely to lead to increased urban sprawl and environmental degradation. They also highlighted research by CPRE showing that very substantial amounts of brownfield land remained in the region and continues to be produced. They felt that the goal of urban regeneration would suffer significantly through the abandonment of this 'brownfield first' policy - with negative consequences for the environment.</p> <p>CPRE also referred to Policy ENV7 stipulating that in the case of housing development, the aim was to achieve the highest possible net density appropriate to the character of the locality and public transport accessibility. Given that the wider changes to the planning system see the abolition of national targets for housing density, they were concerned that with less priority given to density, the environment will suffer as more land is needed for housing than would otherwise be the case.</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
34	Individual Topics - Coast	<p>CPRE pointed out that Policy SS9 set out detailed policies for the region’s extensive coastline. The Regional Strategy noted that the coast required an integrated approach recognising the need for environmental protection and enhancement, its economic and social role and the predicted sea-level rise. They commented that the Environmental Report merely stated that “this policy could be delivered by other means than through the Regional Strategy” and that, where relevant, local authorities must plan for the coast (Table 1 – SS9 The Coast). CPRE were concerned that to the extent that sub-regional co-operation was needed on coastal matters, it actually occurred.</p> <p>Scottish Natural Heritage thought that there should be consideration of impacts on shared marine and coastal environments. A loss of strategic planning could reduce benefits and/or increase impacts from individual plans or actions, though the role of Shoreline Management Plans and</p>	CPRE, Scottish Natural Heritage	<p>The National Planning Policy Framework was published in March 2012. The core planning principles recognise that planning should take full account of flood risk and coastal change. The National Planning Policy Framework also asks that local planning authorities should set out the strategic priorities for their area in their Local Plan, and that this should include strategic policies to deliver the provision of infrastructure for coastal change management. In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. Local planning authorities should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and: be clear as to what</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		Integrated Coastal Zone Management in providing strategic planning was recognised.		development will be appropriate in such areas and in what circumstances; and make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. When assessing applications, authorities should consider development in a Coastal Change Management Area appropriate where it is demonstrated that: it will be safe over its planned lifetime and will not have an unacceptable impact on coastal change; the character of the coast including designations is not compromised; the development provides wider sustainability benefits; and the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast. Local planning authorities should also ensure appropriate development in a Coastal Change Management Area is not impacted by coastal change by limiting the planned lifetime of the proposed development through temporary permission and restoration conditions.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
35	Individual Topics - Flooding	The Environment Agency welcomed the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' (LLFA) duties on flood risk management and the complementary duty in the Floods and Water Management Act on bodies to co-operate. The provision of technical guidance, including on flood and coastal erosion risk, to complement the National Planning Policy Framework would support LLFAs and help achieve the duty to co-operate.	Environment Agency	In March 2012 the Government published the National Planning Policy Framework which contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the provision of infrastructure for flood risk and coastal change management.
36	Individual Topics- Managed Woodland	The Forestry Commission (East of England) referred to the reference to Policy ENV1 in the table on Page 51 which stated that 'This policy could be delivered by other means than through a Regional Strategy'. They highlighted that it does not say how and that this is not addressed by the National Planning Policy Framework which; although it mentions green infrastructure in terms of protected valued landscape, fails	Forestry Commission (East England) of	The updated Environmental Report assesses the impact of revocation of policies ENV1 and ENV5 in the short, medium and long term against the Strategic Environmental Assessment topics as set out in Appendix D of the updated Environmental Report. The National Planning Policy Framework was published in March 2012, and makes specific reference for local authorities to plan

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>to address the importance for communities of green infrastructure provision. They felt that green infrastructure is about the areas around and within settlements and urban areas and which are important for sustainable communities in terms of health and recreation. The environment polices in the East of England Regional Strategy provided stronger and regionally specific policy emphasis and during the Examination in Public of the plan there was all round support for the environment chapter from the local authorities.</p> <p>They valued the particular regional emphasis in the woodland policy as set out in Policy ENV5 and were concerned that this was being lost through revocation. They pointed out that there were policies in the National Planning Policy Framework that are significantly weakened by the addition of such words as 'where possible'.</p> <p>They considered that the green</p>		<p>positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (paragraphs 99 and 114).</p> <p>The National Planning Policy Framework states that Local Plans should contain a clear strategy for supporting Nature Improvement Areas where they have been identified. Nature Improvement Areas provide cross-boundary projects where partners' work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The initial 12 NIAs include the Nene Valley and Greater Thames Marshes. The National Planning Policy Framework also recognises the important role that Local Nature Partnerships have to play in advising local planning authorities, including the assessment of potential new, as well as existing components of ecological networks e.g: the Green Infrastructure Strategy for Cambridgeshire.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>infrastructure policy within the Regional Strategy should be replicated in the National Planning Policy Framework. This policy encouraged local authorities to develop green infrastructure strategies which included woodland. They commented that the danger was that without clear support from the National Planning Policy Framework they may not be pursued and therefore the challenge to meet the recommendations of the Lawton and Read reports could be lost.</p>		<p>The National Planning Policy Framework also recognises that Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications.</p>

ANNEX B

Consultation and Partner Engagement – Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the East of England Regional Strategy ran from 25 July 2012 to 20 September 2012.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for the East of England⁸ have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the East of England have been identified, described and assessed; and,
- the arrangements for monitoring.

In total 19 written responses were received summarised by interest group:

- 6 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- 4 Local authorities (Breckland Council, Stevenage DC, Chelmsford CC and East of England Waste Technical Advisory Group);
- 6 NGOs and local pressure groups (CPRE (West Midlands), Woburn Sands and District Society, Sustainability East, TCPA, Friends of the Earth, Stop Urbanisation of Norwich);
- 1 Solicitors and Barristers (Clyde and Co Solicitors); and
- 2 Industry representative bodies (EdF Energy and Renewables UK).

The following table summarised the points made and the Government's response.

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
1.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>English Heritage considered that the document provides a much more rigorous approach to the analysis than the earlier report. Natural England also considered it to be a significant improvement over the earlier draft with a more analytical approach to identifying the environmental impacts of revoking the Regional Spatial Strategy and welcomed that their comments on the initial draft had largely been incorporated in the options taken and the methodology pursued. The Environment Agency agreed with the overall approach taken to appraise the options. They welcomed the robust report which is much more detailed and clearer than the previous version. They were pleased that the assessment aimed to minimise the significant environmental impacts of revoking the Regional Strategy.</p> <p>Chelmsford City Council commented that the approach to the Environmental Report seemed adequate e.g. it is well structured and presented, identifies significant effects, mitigating measures, assesses reasonable alternatives to revocation and appears to meet the requirements of the Strategic</p>	<p>Comments noted.</p> <p>The Department welcomes the fact that the three English Strategic Environmental Assessment consultation bodies, English Heritage, Natural England and the Environment Agency consider that the updated Environmental Report on the proposed revocation of the East of England Regional Strategy provides a much more rigorous approach to the preparation of the Strategic Environmental Assessment and is a significant improvement on the first Environmental Report published in October 2011.</p> <p>The Department is also pleased to note that this opinion is shared by a range of interested parties, with the TCPA stating, “that the Strategic Environmental Assessment process has been repeated with a methodology aligned to the requirements of the Directive 2001/42/EC” and Friends of the Earth commenting that the updated Environmental Report the methodology used</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Environmental Assessment Directive. Stevenage Borough Council commented that the new report was a considerable improvement, notwithstanding their disagreement with the intention to revoke the regional strategy.</p> <p>TCPA welcomed the fact that the Strategic Environmental Assessment process has been repeated with a methodology aligned to the requirements of the Directive 2001/42/EC. Friends of the Earth noted that the methodology had improved from the previous assessments.</p> <p>EDF Energy supported the approach taken to assess the potential impacts of retaining or revoking the Regional Strategy.</p> <p>Woburn Sands and District Society stated that there was no requirement for a updated Strategic Environmental Assessment, nor was there a requirement to carry out the original assessment consulted on in October 2011.</p>	<p>“had improved from the previous assessment”.</p> <p>The Department recognises that claim by Woburn Sands and District Society but, as set out in Baroness Hanham’s written ministerial statement to the House of Lords on 25 July 2012, felt that it was necessary to carry out a Strategic Environmental Assessment.</p>
2.	The overall approach taken to Strategic Environmental Assessment	<p>Stevenage Borough Council expressed surprise that a Strategic Environmental Assessment and not a Sustainability Appraisal (SA) had been undertaken given that SAs were carried out for the adoption of the Regional Spatial Strategy.</p>	<p>Comment noted.</p> <p>Sustainability appraisals of revisions to the Regional Spatial Strategy and to Local Development Documents are required under the Planning and Compulsory Purchase Act 2004</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>(sections 5(4a) and 19(5)). Outside the context of the Planning and Compulsory Purchase Act 2004, SA is not a statutory requirement for plans, programmes or strategies, although it is applied informally. Given the need to address the judgment of the Court of Justice of the European Union in March 2012 on the applicability of the Strategic Environmental Assessment Directive to a procedure for the total or partial revocation of a land use plan, it was considered that Strategic Environmental Assessment was the more appropriate assessment and enabled the Government to meet its stated commitment to protecting the environment..</p>
3.	<p>The overall approach taken to Strategic Environmental Assessment – reasonable alternatives</p>	<p>Stevenage Borough Council view was that the Report did not clearly distinguish between the Regional Spatial Strategy and the Regional Economic Strategy (for instance when considering alternatives), and the impacts of revoking the Regional Spatial Strategy and those of revoking the Regional Economic Strategy, nor do the alternatives include combinations of revoking one of these while retaining the other.</p>	<p>Disagree.</p> <p>The Environmental Report clearly distinguishes between the Regional Spatial Strategy and the Regional Economic Strategy. It states that the Regional Strategy under consideration for revocation comprises the East of England Plan published by the then Secretary of State in 2008 and the Regional Economic Strategy published by the East of England Development Agency (the Non Technical Summary and section 2.1). Weblinks are provided to the adopted documents</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>in section 2.1 of the Environmental Report and the history and content of each strategy is summarised in section 2.3 of the Environmental Report. The Regional Spatial Strategy policies (in full) are presented in Appendix A and the linkages between the Regional Spatial Strategy and Regional Economic Strategy detailed in Appendix H. All information is summarised in page iii – vi of the Non-Technical Summary (NTS) under the heading ‘The East of England Regional Strategy’.</p> <p>Regional strategies came into force under the Local Democracy Economic Development and Construction Act 2009. The intent was that each Regional Strategy would initially consist of the existing Regional Spatial Strategy and the Regional Economic Strategy for the region but for the responsible authority in each region to bring forward a revised Regional Strategy. However, no revised Regional Strategy were adopted so each Regional Strategy continued to consist of the existing Regional Spatial Strategy and the Regional Economic Strategy. Consistent with the legislative requirement, the Regional Spatial Strategy and Regional Economic Strategy should</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>be viewed as one integrated document containing aims, policies, targets and actions for the region; hence the assessment does not make the distinction commented upon.</p> <p>The reasonable alternatives considered by the assessment are presented in section 2.4 of the Environmental Report. The identification and development reflected responses made to the initial Environmental Report (October 2011). A proposed reasonable alternative based on a retention of the Regional Spatial Strategy and revocation of the Regional Economic Strategy (or vice versa) was not made by consultees at this stage. As indicated above, the Regional Spatial Strategy and Regional Economic Strategy should be viewed as one integrated document and the reasonable alternatives do not distinguish purely on provenance or topic. Finally it is noted that the Regional Development Agencies were abolished on 1st July 2012 and so there is no responsible regional body in existence to revise the Regional Economic Strategy which suggests that the alternative proposed whilst plausible would not meet the reasonableness test.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
4.	The overall approach taken to Strategic Environmental Assessment – reasonable alternatives	Stevenage Borough Council commented that in their view the Environmental Report did not provide an outline of the reasons for selecting the alternatives dealt with.	Disagree. Section 2.4 of the Environmental Report describes the reasonable alternatives considered (and their source, whether government proposed or from consultee responses to the initial Environmental Report). The reasonable alternatives include retention, revocation and partial revocation. Section 2.4.1 and 2.4.2 present the reasons for the selection of those reasonable alternatives to be assessed. These reasonable alternatives are summarised in the NTS under the section entitled ‘What reasonable alternatives were identified and assessed?’.
5.	The overall approach taken to Strategic Environmental Assessment – reasonable alternatives	Stevenage Borough Council also stated that the Environmental Report does not clearly and explicitly state why, having considered a range of reasonable alternatives to revocation, the government still finds full revocation to be the preferred option.	Comment noted. The first paragraph of section 2.4 states: <i>‘Regional strategies set targets such as housing numbers for local authorities. In some areas this proved highly controversial, generated thousands of objections and is not consistent with the principles of localism. This Government believes that democratically elected local authorities working with their local people are better placed to assess and plan for the needs of their community, and make planning decisions, rather</i>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p><i>than unelected regional bodies. The Government therefore proposes revoking the East of England Regional Strategy.'</i></p> <p>It is the Government's view that this is a clear statement of the preferred (pre-assessment) option. However, the Environmental Report should not then present the Government's (post assessment) final Plan to Revoke (including any mitigation measures) as this final plan should only arise in response to the Strategic Environmental Assessment findings and the consultation on the Environmental Report. It is only after considering the findings of the Environmental Report and the views expressed by the statutory consultees and members of the public that the Government can arrive at a final decision. This is then presented in section 6 of this PAS.</p>
6.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>Stevenage Borough Council commented on the apparent lack of objectivity in some of the assessment commentary which was felt to highlight positive outcomes when discussing revocation verses negative outcomes in the retention scenario, despite concluding that there will be no significant</p>	<p>Disagree.</p> <p>The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. These are presented in each topic chapter of</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		differences in effect between the two.	<p>Appendix E (Tables 1.5, 2.2, 3.1, 4.4, 5.2, 6.1, 7.2, 8.4, 9.1 and 10.1). Appendix E also set out the baseline and contextual information for each topic to inform the assessment. The approach taken has been to provide a robust and Strategic Environmental Assessment compliant assessment of effects.</p> <p>Necessarily though, when considering future effects in an uncertain and changing environment, there remains a degree of professional judgement involved; however, any assumptions made are explicit within each policy assessment in Appendix D and within section 3.4.5 of the Environmental Report.</p> <p>The assessment concluded that the range of effects of revocation and retention were likely to be broadly similar; however, that there could be differences in scale and timing of the effects. For example, for revocation, there may be more uncertainty about impacts in the short and medium term due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
7.	<p>The overall approach taken to Strategic Environmental Assessment – predetermination</p>	<p>Stevenage Borough Council comment that the preferred alternative was chosen before any assessment work was undertaken and the outcome of the process had been predetermined.</p> <p>Clyde and Co and Icen Projects Ltd commented that it was clear that the Government was determined to revoke all regional strategies (including the Regional Strategy) as a matter of principle. This considered that this undermined the purpose of the consultation exercise and casted serious doubt on the robustness of any conclusions that are purportedly made. They referred to Article 6(5) of the Directive which emphasises the high importance of proper public consultation. In their view it followed that a failure to properly undertake this process fatally undermines its legality.</p>	<p>Disagree.</p> <p>The Government announced in the Coalition Agreement its intention to “rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils”. However, the intention has been subject to extended consultation (through Strategic Environmental Assessment for a total period of 5 months) and been assessed against the requirements of the Strategic Environmental Assessment Directive twice.</p> <p>One respondent thought the Government had decided on the preferred option before the assessment was undertaken and thus predetermined the issue. The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives), the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>extensive consultation and consideration of consultation responses in the final decision to revoke the East of England Regional Strategy.</p> <p>If, as a result of monitoring of the effects, it became apparent that implementation of the revocation had lead to significant negative environmental effects, the Government would consider measures to address or mitigate those effects.</p>
8.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>The Town and Country Planning Association commented that despite setting this assessment more thoroughly in the environmental and plan making context of the East of England region, they had concerns about the way that the method has been applied. They considered it surprising that the tabulated assessment scorings show remarkably little difference in environmental effects between the retention and revocation alternatives, and this appeared to be due to the reliance on a crucial assumption about the effectiveness of the duty to co-operate.</p>	<p>Disagree.</p> <p>The assessment concluded that the <i>range</i> of effects of revocation and retention were likely to be broadly similar; however, that there were differences in <i>scale</i> and <i>timing</i> of the effects for 11 of the 86 policies assessed. These include policies for employment land, housing provision and sub-regional centres and were not just in relation to the operation of the duty to co-operate.</p> <p>Section 4.6 summarises the findings of the assessment and includes the following statements:</p> <p><i>'For revocation, there may be more uncertainty about impacts in the short and medium term due to the transition period for those local planning</i></p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p><i>authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities.</i></p> <p><i>The effects of revocation of policies which provide strategic direction whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites will be more uncertain until all participating local authorities define, agree and implement the duty to co-operate and then reflect them in their adopted plans.</i></p> <p><i>Whilst the duty to co-operate could well address a wide range of strategic issues, there is uncertainty as to how this might work both by topic and geographically. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised'.</i></p> <p>These comments summarise the uncertainties identified in the assessment concerning how the duty to co-operate will work and temper any assumptions made on its effectiveness. The assumptions and associated uncertainties are</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			also summarised in section 3.4.5 of the updated Environmental Report.
9.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>CPRE state that the Strategic Environmental Assessment was flawed as it:</p> <ul style="list-style-type: none"> • relies on an optimistic view of the delivery of environmental protection in local plans and the National Planning Policy Framework • relies on untested processes for co-operation between local authorities • fails to address how the current arrangements might be improved to ensure an approach to strategic planning which is rigorous and engages all sectors. • fails to address how the Government should tackle the acknowledged regional and national disparities which it envisages emerging 	<p>Disagree.</p> <p>The assessment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the Regional Strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework and PPS10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>management planning.</p> <p>In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the National Planning Policy Framework have been referenced in the individual policy assessments to provide a substantial alternative source of planning policy relevant to the Local Plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local examples of current cooperation are also cited where available. Examples where authorities have been co-operate analogous to the duty to co-operate include the East of England Waste Technical Advisory Group, the Greater Norwich Partnership (comprising the Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council), Essex Councils are working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency to develop the Northstowe new town.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>However, despite the above comments, CPRE concluded that they did not see any reason not to rapidly revoke the East of England Regional Strategy. However, they believed it was inherently difficult to assess the impact of the revocation of Regional Strategies and were concerned that when considering alternative options the assessment does not appear to consider modifications to the new planning regime or institutions to ensure account is taken of strategic planning in the round.</p> <p>Friends of the Earth stated that while the methodology had improved from the previous assessments, the Environmental Report continued to state that the new planning reform measures</p>	<p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2) which include the potential that over the medium and longer term, the wider effects of setting (and delivering) local housing targets could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.</p> <p>Comment noted.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		would deal effectively with strategic spatial issues without providing any evidence as to whether this has been the case since March 2012.	
10.	The overall approach taken to Strategic Environmental Assessment	Breckland Council queried why Appendix E had not fully assessed all policies for both retention and revocation against each Strategic Environmental Assessment topic area. Instead only policies deemed relevant are assessed against a topic area. They also questioned the principle of revoking the East of England plan given that the Strategic Environmental Assessment appears to show that overall against the Strategic Environmental Assessment topic areas many issues are likely to be more efficiently and effectively dealt with through the existence of the plan.	<p>Comment noted.</p> <p>The approach is detailed in section 3.3.3 and 3.4 of the Environmental Report. Appendix D of the updated Environmental Report presents an assessment of the effects (including likely significant, minor or neutral effects) for the retention and revocation of all Regional Strategy policies. Appendix E of the Environmental Report focuses on only those policies where a likely significant effect (whether positive or negative) has been identified in the short, medium or long term in Appendix D and considers the effects by Strategic Environmental Assessment topic. This is in line with the requirements of the Strategic Environmental Assessment Directive.</p> <p>The Environmental Report showed that against all topic areas the effects of retention of the East of England Regional Strategy are positive, and the effects of revocation of the Regional Strategy are positive.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
11.	<p>Additional information that should be contained with the baseline or review of plans and programmes</p>	<p>The Environment Agency referred to the reference on page viii of the Non-Technical Summary that '33% of estuaries currently achieve at least good biological status'. In the Anglian River Basin District, only 16.6% of estuaries meet good biological status. They recommended that the most up to date data from river basin districts are considered. They also noted that whilst the report refers to Anglian Water's water resource management plans, it should also consider water resource management plans produced by the following water companies which operate within the East of England: Essex and Suffolk, Cambridge Water, Veolia East Water, Veolia Central. They suggested that the Cambridge Partnership for Sustainability Leadership and the EU Life + Water Bid were two initiatives which should be taken into account when considering the potential impacts of revoking the East of England Regional Strategy.</p>	<p>Comment noted.</p> <p>The approach to assessment was set out in the scoping consultation undertaken in May 2011. The approach included using information from the relevant sustainability appraisal that accompanied the adopted Regional Spatial Strategy and/or Regional Economic Strategy. This was accepted by the scoping consultees; however, consultation responses to the first Environmental Report indicated that further baseline and contextual information was needed. The updated Environmental Report supplemented the information with substantial additional information covering all ten assessment topics.</p> <p>The information in the NTS is taken from section 5.3.2 of Appendix E. This includes a subsection on 'Water Quality' in which the Anglian River District River Basin Management Plan is referenced and the ecological and chemical status of the of all catchments in the East of England are presented (using information from the Environment Agency).</p> <p>The role and importance of Water Resource Management Plans is identified in the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			Environmental Report and Appendix E and Anglian Water is referenced as an example. The additional water companies identified is helpful in providing a more complete picture of those companies with a statutory responsibilities; however, does not materially affect the assessment. We note that Veolia Water is now renamed Affinity Water.
12.	Additional information that should be contained with the baseline or review of plans and programmes	Natural England commented that of the networks listed for the East of England none has a focus on the environment or addresses the topics of water, biodiversity and landscape, which are identified within the assessment as topics that would benefit from a cross boundary approach to issues. Further clarity could be provided on funding opportunities that will facilitate effective cross boundary working and what effect these might have.	Comment noted. The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.
13.	Additional information that should be contained with the baseline or review of plans	Stevenage Borough Council commented that for a few environmental topics the baseline is weak and environmental characteristics of areas likely to be significantly affected have often been described in a sketchy manner.	Disagree. The approach to assessment was set out in the scoping consultation undertaken in May 2011. The approach included using information from the relevant sustainability appraisal that

No	Issue and programmes	Summary of consultation responses to the updated Environmental Report	Response
		<p>They added that Appendix C helpfully compares, for each local authority, the housing numbers from the Regional Strategy against those in current plans.</p>	<p>accompanied the adopted Regional Spatial Strategy and/or Regional Economic Strategy. This was accepted by the scoping consultees; however, consultation responses to the first Environmental Report indicated that further baseline and contextual information was needed. The updated Environmental Report supplemented the information with substantial additional information covering all ten assessment topics at national, regional and sub-regional levels. Appendix E contains the resulting topic information, consistent with the requirements of Annex I (b) to (e) of the Strategic Environmental Assessment Directive. It is 234 pages long, contains 181 explicit references and in excess of 150 plans and programmes referenced and reviewed. Appendix G contains information for all European designated sites in the region.</p> <p>Comment noted.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>However, it does not add these up to provide a total figure, nor does it provide a commentary to support the comment that the 'application of the National Planning Policy Framework's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date'.</p>	<p>Appendix C presents a list of local plans in the East of England region and compares the policies in the local plans and/or core strategies with those in the East of England Plan on housing allocations, allocations of pitches for gypsies, travellers and showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock and waste apportionment. Housing figures for the region are not totalled; however, with 23 of the 47 local plans not containing housing policies in conformity with the Regional Strategy policy H1, there is a difference, which is acknowledged throughout the report. For example, in terms of housing, the effects of revocation for those local planning authorities will be <i>'uncertain in those local authorities that do not have a plan that was in general conformity with the East of England Plan in the short and medium term following revocation....The amount of development anticipated in this period may be lower than if the regional strategy were in place.'</i> (page 62 of the Environmental Report). Any total will be subject to change over time, dependent on the content of adopted new local plan policies, reflective of local housing need in these remaining 23 local</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>planning authorities. In AMECs view it was not the total per se that was important, rather that there was a difference manifest in nearly half of all local plans in the region.</p> <p>The reference to the National Planning Policy Framework and the presumption in favour of sustainable development reflects statements in the National Planning Policy Framework itself, for example:</p> <p>‘For decision-taking this [sustainable development] means:</p> <ul style="list-style-type: none"> • approving development proposals that accord with the development plan without delay; and • where the development plan is absent, silent or relevant policies are out of date, granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.’ (paragraph 14) <p>‘Policies in Local Plans should follow the approach of the presumption in favour of</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		Discussion of sub-regional policies for the revocation scenario omits Stevenage.	<p>sustainable development so that it is clear that development which is sustainable can be approved without delay.’ (paragraph 15) and ‘In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.’ (paragraph 197).</p> <p>Stevenage is identified specifically in the assessment of retention and revocation of policy SV1 in Appendix D (pages 221 - 224). This is reflected in the Environmental Report (page 56, page 86 and page 94).</p>
14.	Whether the likely significant effects have been identified, described and assessed	The Environment Agency stated that further consideration needs to be given on how strategic issues such as renewable energy production, biodiversity enhancement and landscape conservation, will be tackled locally. They also commented that in the absence of an overarching agreement on a renewable energy target for the East of England, it is possible that few new renewable energy proposals will be put forward and suggested that further consideration is given to how LAs in the East of England can contribute to	<p>Comment noted.</p> <p>It will be for local planning authorities to determine local responses to the issues consistent with the objectively assessed and up to date needs of their communities, following the guidance on such issues set out in the National Planning Policy Framework.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		meeting the national renewable energy generation target of 15% by 2020.	renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised. The response also sets out those factors outside the Plan to Revoke the East of England Regional Strategy which mitigate this issue.
15.	Whether the likely significant effects have been identified, described and assessed	Natural England commented that the presentation of the material in the conclusion does not allow for consideration of how the scoring has been reached. Some of this information is contained within the extensive appendix, however it is not clearly referenced and much of the information in the appendix does not relate to the assessment.	Disagree. Section 3 of the Environmental Report sets out the Strategic Environmental Assessment methodology used in the assessment. This includes the steps in the Strategic Environmental Assessment process, when it was undertaken and by whom (Section 3.1), the scope of the assessment and the topics considered (Section 3.2), the baseline and contextual information used (Section 3.3) and the approach taken to completing the assessment (Section 3.4). Technical difficulties encountered during the assessment are also summarised (Section 3.5). Section 3.4 sets out the two stage nature of the assessment: <ul style="list-style-type: none">• A high level (or screening) assessment of the effects of the proposals for each regional

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			<p>strategy policy against all Strategic Environmental Assessment topics to identify those where there could be a likely significant effect; and</p> <ul style="list-style-type: none"> • A detailed assessment of the likely significant effects (both positive and negative) identified through the high level assessment process of each regional strategy policy, presented under each Strategic Environmental Assessment topic. <p>The high level assessment is presented in Appendix D in an assessment matrix covering the effects of retention and revocation of each regional strategy policy against all Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects. The commentary outlines the likely significant effects, any mitigation measures, assumptions and uncertainties.</p> <p>The detailed assessment is presented in Appendix E at the end of each topic chapter. The topic chapters contain information required by Annex I (b) to (g) of the Strategic Environmental</p>

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		<p>They considered that the Environmental Report should already contain an evaluation of how the environmental considerations will affect the decision, and that this should be included within the summary.</p>	<p>Assessment Directive and are considered german to the assessment.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 and summarised in table NTS3.</p> <p>All information is summarised in Section 4, and 5 of this report and then further summarised in the NTS. Therefore the scoring sand assessments do inform the conclusions set out in the Environmental Report.</p> <p>Disagree.</p> <p>Annex I of the Strategic Environmental Assessment Directive (and Schedule 2 of the Strategic Environmental Assessment Regulations) sets out the requirements for the Environmental Report. Neither require that the Environmental Report to set out an evaluation of how the environmental considerations will affect the decision. However, Article 9 of the Strategic Environmental Assessment Directive (and regulation 16 of the Strategic Environmental Assessment regulations) do require the Post Adoption Statement (PAS) to provide:</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<ul style="list-style-type: none"> • how environmental considerations have been integrated into the Plan to Revoke the East of England Regional Strategy; • how the Environmental Report has been taken into account; • how opinions expressed in response to the consultation on the Environmental Report have been taken into account • the reasons for choosing the Plan to Revoke the East of England Regional Strategy, as adopted, in the light of the other reasonable alternatives dealt with; and • the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the East of England Regional Strategy. <p>The Post Adoption Statement is structured to address these requirements and section 3 of the Post Adoption Statement outlines how environmental considerations have been integrated into the Plan to Revoke the Regional Strategy.</p>
16.	Whether the	Breckland Council queried how revoking Policy	Comment noted.

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	<p>likely significant effects have been identified, described and assessed</p>	<p>H1 and the potential consequences of an uncertain level of housing being provided through locally defined levels of housing growth, have been considered favourably. In their view an uncertain effect against population objectives will occur. They also noted that the assessment scores the retention of Policy E1 more positively than the option for revocation. They considered that the Government's option to revoke the Regional Spatial Strategy (in view of E1) is not the most sustainable option when considered against the alternatives in this instance.</p>	<p>Policies (whether regional or local) that make provision of sites for housing and employment and for net additional dwellings were identified in the Environmental Report as having significant positive effects on population and human health. The Regional Spatial Strategy had a net additional target of 26,800 per annum, although housing completions in 2010/11 were significantly below this (at 17,100).</p> <p>Revoking the Regional Strategy and policy H1 and E1 is likely to affect those 23 authorities who have a pre 2008 plan, whose housing and economic policies are unlikely to meet their current objectively assessed needs. Whilst local planning authorities develop up to date policies in accordance with the National Planning Policy Framework, the benefits may be less significant in the short and medium term. This arises from a lower level of development (and number of development applications) whilst there is uncertainty over local development plan policies. However, the application of the National Planning Policy Frameworks presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or</p>

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			<p>policies are absent, silent or out of date. These issues are addressed once the revised policies are adopted (which the assessment has assumed will be by the end of the medium term).</p> <p>Section 6 of the Post Adoption Statement provides the reasons for choosing the Plan to Revoke the East of England Regional Strategy, as adopted, in the light of the other reasonable alternatives dealt with.</p>
17.	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>Breckland District Council commented that Appendix E did not include any consideration of Policy TH1, even though there were references in the preceding text that relate to the environmental sensitivity of Breckland (i.e. page 15 of Appendix E) and the acknowledged potential for impacts upon European Sites.</p>	<p>Disagree.</p> <p>Appendix E contains an assessment of the likely significant effects (by topic) of the revocation and retention of individual policies drawing on the assessment of all policies in Appendix D. Page 225 – 228 of Appendix D identifies the range of effects of TH1 including likely significant positive effects against the population topic and significant negative effects against the water topic. Page 63 of Appendix E identifies the population effects and page 127 of Appendix E details the significant negative effects on water.</p>
18.	<p>Whether the likely significant effects have</p>	<p>Referring to page 90 of the main report, Breckland District Council commented that it contains contradictions on the relevance of the plan, stating</p>	<p>Disagree.</p> <p>Page 90 of the Environment Report is part of</p>

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	<p>been identified, described and assessed</p>	<p>that the retention will offer benefits across nearly all Strategic Environmental Assessment topic areas, however not identifying differences between retaining and revoking the plan. They considered that such contradictions are repeated across a number of topic areas.</p>	<p>section 4.3 which summarises the effects of retention of all Regional Strategy policies grouped by the 13 East of England Plan policy areas. Page 90 concerns the effects of retention of Regional Strategy policies EN1 (Green Infrastructure) to ENV7 (Quality of the Built Environment) under the policy group heading 'Environment'. Page 90 of the Environmental Report states:</p> <p><i>'The assessment has shown that retaining the East of England Plan supported by the National Planning Policy Framework there will be benefits across virtually all of the Strategic Environmental Assessment topic areas with many of the effects being significant.'</i></p> <p>This finding is consistent with the scope of the 7 policies under the 'Environment' heading and should not be confused with any broader assessment of all 86 Regional Strategy policies. These broader effects are summarised in section 4.6, section 5 and the NTS which note differences between retention and revocation, for example: <i>'Where it occurs, differences between retention and revocation are most clear in respect of housing and employment allocations..... In the</i></p>

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			<p><i>case of revocation there may be more uncertainty about impacts in the short and medium term due to the transition period for those authorities where plans are out of date or who need to establish the arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in their adopted local plans'.</i></p>
19.	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>Breckland District Council commented that they considered there was uncertainty within the Strategic Environmental Assessment of the implication of the revocation of Policy T15 Transport Investment Priorities. They considered that the ability to secure necessary transport investment for larger than local schemes without policy T15, where the reliance on the duty to co-operate is the sole implementation mechanism, is unlikely to be achieved.</p>	<p>Comment noted.</p> <p>The National Planning Policy Framework (paragraphs 29 – 41) set out the requirements on local planning authorities to promote sustainable forms of transport, local planning authorities are responsible for working with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support the sustainable development of their localities. Again the duty to co-operate will underpin collaborative strategic working by local planning authorities, working with the local transport authorities if necessary, to promote the provision of transport infrastructure which will support the sustainable growth of their</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			localities.
20.	Whether the likely significant effects have been identified, described and assessed	Clyde and Co and Icen Projects Ltd commented that the assessment had not considered the likely impacts on surrounding regions.	<p>Disagree.</p> <p>Page 108-109 of section 4.5 'Secondary, Cumulative and Synergistic Effects' outlines the effects on other regions. For example, the text includes the following:</p> <p><i>'..under revocation there is also the opportunity for adjacent authorities in previously different regions to explore joint working which may help address some of the potential issues that could arise.</i></p> <p><i>At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution. Macro-scale trends such as the decentralisation of population from urban areas are arguably more difficult to address through local initiatives, as is regeneration which might be more efficiently tackled through regional-scale policy. National transport policies such as HS2 and other</i></p>

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		<p>Clyde and Co and Icen Projects Ltd also comment that the Environmental Report makes the assumption that the principal negative effects of revocation - being a reduction in housing land supply and supply of affordable housing - will be overcome in the long term, with 'significant positive effects' being identified. They considered this to be an optimistic assumption, barring a major change in government policy, and is bereft of any empirical analysis.</p>	<p><i>measures to improve the effectiveness of national transport networks and the ease of accessibility between regions will become increasingly important to counter such potential effects.</i></p> <p>Page 110 of Section 4.6 includes the following concluding remarks:</p> <p><i>'More widely, and over the longer term, inter- and intra-regional differences could be magnified as a result of the sum of local decisions which reflect strongly varying circumstances such as housing demand.'</i></p> <p>Estimates of future growth in the long term (where long term is defined in section 3.2.3 of the Environmental Report as being more than 5 years from the date that the National Planning Policy Framework was published) will remain subjective. However, given the guidance in the National Planning Policy Framework concerning the presumption in favour of sustainable development, for example:</p> <p>'For decision-taking this [sustainable development] means:</p> <ul style="list-style-type: none"> • approving development proposals that accord

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			<p>with the development plan without delay; and</p> <ul style="list-style-type: none"> • where the development plan is absent, silent or relevant policies are out of date, granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.’ (paragraph 14) <p>and</p> <p>‘Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.’ (paragraph 15).</p> <p>and</p> <p>‘Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. (paragraph 17)</p> <p>and that the Plan to Revoke the regional strategy will also be supported by incentives such as the</p>

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			<p>New Homes Bonus, it does not seem unreasonable to consider that these changes will have the positive effect described in the Environmental Report in the long term.</p> <p>The report also highlights examples of local co-operation between local authorities to deliver housing.. These include the Greater Norwich Partnership (comprising the Broadlands District Council, Norwich City Council, South Norfolk Council and Norfolk County Council). Essex Councils working together to develop an integrated growth strategy and South Cambridgeshire District Council and Cambridge County Council that are working together jointly with the Homes and Community Agency to develop Northstowe new town.</p> <p>Table 4.2 of the Environmental Report provides more details about how local planning authorities are working to meet local housing targets.</p>
21.	Whether the likely significant effects have	CPRE stated that a key conclusion of the assessment was that the East of England is likely to see increased housing and other development	<p>Comment noted.</p> <p>Table NTS2 presents a very high level summary of the effects of the Plan to Revoke the Regional</p>

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	been identified, described and assessed	pressures. They were surprised that in Table NTS2 positive benefits of additional health and other facilities are identified but the table does not suggest environmental disbenefits in areas where one would expect pressures to emerge, e.g. on landscape, heritage and air quality. They were concerned that increasing development pressure in regions already under strain, such as the East of England, will increase environmental and landscape challenges in those areas while undermining regeneration in urban areas in other parts of the country.	Strategy and the reasonable alternatives to it. It notes adverse effects on water resources from housing and economic development policies and highlights that there are specific effects and uncertainties associated with the sub-regional policies. Cumulative effects on biodiversity, land take and air quality are also noted in Table NTS3 and the negative effects on landscape are required in the main body of the report (Table 4.1, 4.2 and 4.5) for example.
22.	Whether the likely significant effects have been identified, described and assessed	Renewable UK commented that the Environmental Report does not address the loss of the key mechanisms for strategic planning and renewable energy. These include mechanisms to translate nationally agreed renewable energy targets into local targets; monitoring arrangements and data management arrangements. The removal of valuable information and guidance contained in PPS22 on Renewable Energy is also affecting the ability of Local Planning Authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of	Comment noted. The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised. Table 4.2 of the Environmental Report provides

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		generating 15% of all energy from renewables by 2020.	more details about how local planning authorities are working to plan at a strategic level, underpinned by the duty to co-operate, for strategic planning issues such as the provision of renewable energy.
23.	Whether the likely significant effects have been identified, described and assessed	Sustainability East broadly agreed with Appendix E in relation to climate change (policy ENG1) and the renewable energy targets (policy ENG 2).	Comment noted.
24.	Whether the likely significant effects have been identified, described and assessed	The Town and Country Planning Association considered that the potential short-term effects on delaying development have been underestimated and considered that it was risky to put so much reliance as a mitigation factor on the assumption that LAs will continue to work together on cross boundary strategic issues, and to assume that the inclusion of a brief policy in the National Planning Policy Framework and the duty to co-operate are effective substitutes for regionally specific policy on key environmental topics.	<p>Comment noted.</p> <p>The assessment does not rely only on the National Planning Policy Framework and the duty to co-operate but refers to hierarchy of measures that will apply in the absence of the Regional Strategy. These include:</p> <ul style="list-style-type: none"> existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) existing planning policy (such as the National

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			<p>Planning Policy Framework and PPS10)</p> <ul style="list-style-type: none"> • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. <p>The differences in the scale and timing of the effects arising from revocation when compared to retention are summarised in section 4.6 and in the NTS. The following text from section 4.5 and 4.6 makes clear these effects are not intentionally understated:</p> <p><i>‘In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This</i></p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p><i>could create disparities which are difficult to reconcile without significant interventions.</i></p> <p><i>For revocation, there may be more uncertainty about impacts in the short and medium term due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities.</i></p> <p><i>The effects of revocation of policies which provide strategic direction whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites will be more uncertain until all participating local authorities define, agree and implement the duty to co-operate and then reflect them in their adopted plans.</i></p> <p><i>Whilst the duty to co-operate could well address a wide range of strategic issues, there is uncertainty as to how this might work both by topic and geographically. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.'</i></p>

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25.	Whether the likely significant effects have been identified, described and assessed	The Town and Country Planning Association commented that no attempt has been made to assess the loss of the policy-led redistribution of pitch numbers for Gypsies and Travellers across the region (Regional Strategy Policy H3), as opposed to an approach based on meeting locally generated needs under new national policy, March 2012, under the revocation alternative. There is no mention at all of the effects of revoking Policy H4, plot requirements for Travelling Showpeople which were given on a virtual County basis for 2006-11, either in the Appendix C policy description and existing local plan equivalents, or in the assessment scorings	Disagree. Page 62 - 65 of Appendix D assesses the effects of retention and revocation of policies H3 and H4. Appendix C presents a list of local plans in the East of England region and compares the policies in the local plans and/or core strategies with those in the East of England Plan for a variety of quantitative policies including allocations of pitches for gypsies, travellers and showpeople which is then referenced in the assessment of the effects of revocation. Page 55 - 56 of Appendix E also comments on the effects of H3 and H4. Page 63 of the Environmental Report also includes commentary on the effects arising from revocation with regard to gypsies and travellers.
26.	Whether the likely significant effects have been identified, described and assessed	English Heritage commented that there could be an argument for any of the alternatives put forward. However, simplicity has many advantages and the complexity of saved policies in county structure plans and local plans has added difficulties to public understanding of strategic planning in recent years. Natural England endorsed the alternatives selected for assessment.	Comment noted. The Department welcomes the comments from two of the English Strategic Environmental Assessment consultation bodies English Heritage and Natural England endorsing the alternatives selected for assessment and the recognition that the proposal to revoke the East of England Regional Strategy will simplify the planning system.

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27.	Whether the likely significant effects have been identified, described and assessed	East of England RTAB and Sustainability East both commented that the alternatives do not include the “business as usual” scenario, which in this case would be the retention of the Regional Strategy and updating it in accordance with other policy and requirements over time.	<p>Disagree.</p> <p>Section 2.4 ‘Reasonable Alternatives to the Plan to Revoke the Regional Strategies’ included as one alternative, the retention, maintenance and updating of the East of England Regional Strategy. However, the Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised Regional Strategies. This means that the Secretary of State does not have the statutory powers to maintain or update the East of England Regional Strategy and therefore, the amendment of the regional strategies by the Secretary of State is not considered to be a reasonable alternative because there is no power to do it. The Environmental Report (page 27) continued:</p> <p><i>‘The 2004 Planning and Compulsory Purchase Act does provide for joint working by local authorities and county councils. In addition the Localism Act sets out the duty to co-operate, which requires local planning authorities to work together when preparing strategic cross boundary</i></p>

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			<p><i>policies in their local and marine plans. This means that groups of local authorities can work together and formally adopt a statutory local plan covering their joint areas and could choose to work together to adopt and maintain a plan over the region. Whilst there is substantial evidence of local authorities already working at the regional scale on specific issues of responsibility and mutual benefit (such as waste management), it seems highly unlikely that all local authorities within the region, irrespective of background, circumstance and political composition would work in unison to update the East of England Regional Strategy, particularly where such a position would place them in conflict with national government policy. In consequence, this is not considered to be a reasonable alternative.'</i></p>
28.	Monitoring	<p>English Heritage suggested that monitoring could include a measure of engagement with historic environment issues within joint strategic planning arrangements to ensure that broader characterisation work is available to assist understanding at local level.</p>	<p>Comment noted.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the East of England Regional Strategy are contained in the Post Adoption Statement (section 7 and Annex C).</p>

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			<p>The National Planning Policy Framework (paragraphs 126 – 141) illustrate the key role which local planning authorities have through the development management decisions they take and the local plans they prepare in conserving and enhancing the historic environment. Naturally local planning authorities will wish to monitor the impact of the planning system upon the conservation and enhancement of the historic environment in their localities. Local planning authorities must report on their performance against the duty to co-operate in their monitoring reports.</p>
29.	Monitoring	<p>The Environment Agency suggested monitoring of the deployment of renewable energy infrastructure and subsequent renewable energy generation across the East of England. RenewableUK welcomed the provisions on monitoring in the report, especially those for the monitoring of</p>	<p>Comment noted.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the East of England Regional Strategy are contained in the</p>

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		<p>greenhouse gases. However, in their view renewable energy generation needs to be monitored as well, in order to be able to understand the connection between these elements and other related ones that will be monitored (e.g. air quality, human health, biodiversity).</p> <p>The Environment Agency sought further information about proposals for monitoring including clarity on whether the Department for Communities and Local Government would be monitoring development or implementation of environmental policies in local plans as well as progress on the production and update of local plans. They strongly recommended closer monitoring of highly complex, cumulative effects such as climate change, water quality and water resources.</p>	<p>Post Adoption Statement (section 7 and Annex C).</p>
30.	Monitoring	<p>Friends of the Earth suggested that the Environmental Report should consider how to deal with the cumulative and long term effects – which it fails to do for instance on water resources. No new measures to mitigate the serious adverse impacts as a result of water scarcity are addressed in a way that deals with the gap left by the removal of the Regional Strategy.</p>	<p>Comment noted.</p> <p>The Environmental Report (in the NTS and in section 4.2, 4.3, 4.5 and 4.6) notes the significant negative effects is in relation to water resources arising from development associated with policies for housing and employment provision. The region is the driest in the country and securing adequate water supply is already a challenge</p>

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			with resources declining. Mitigation measures are likely to include water company water resource management planning, river basin management planning, water cycle studies, and the application of policies in the National Planning Policy Framework and the Code for Sustainable Homes which are designed to secure efficient water usage.
31.	Reliance on the National Planning Policy Framework and the duty to co-operate.	English Heritage believe the approach in the National Planning Policy Framework, embedding the historic environment within the definition of sustainable development and the core planning principles, is helpful to ensuring that the historic environment is recognised as relevant to a wide range of planning policy areas, well beyond stand-alone historic environment policies. However, the fact that the National Planning Policy Framework lacks the distinctiveness of the regional strategy policies should be better reflected. Thus, the need for liaison with English Heritage should be identified where the cumulative significance of assets calls for identification at a greater than local scale.	<p>Comment noted.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the Post Adoption Statement) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p> <p>Paragraphs 126 – 141 of the National Planning Policy Framework illustrate the key role which local planning authorities have through the development management decisions they take and the local plans they prepare in conserving</p>

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			and enhancing the historic environment. English Heritage is identified as one of the bodies which local planning authorities through the duty to co-operate should work with when preparing their local plans and working in liaison with local planning authorities can promote policies which address the preservation and enhancement of cultural and historical assets such as historical landscapes and settlements.
32.	Reliance on the National Planning Policy Framework and the duty to co-operate.	The Environment Agency agreed that the National Planning Policy Framework and other existing policy frameworks and partnerships will provide an enabling environment for the protection and enhancement of the environment. However, achieving environmental outcomes may be more challenging during the transitional period up to the Regional Strategies being revoked, as the duty to co-operate is new and some practical aspects still need to be clarified.	Comment noted. The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the Post Adoption Statement), including on the effects of revocation of policies which provide strategic direction being more uncertain until all participating local planning authorities define, agree and implement the duty to co-operate and then reflect them in their adopted plans.
33.	Reliance on the National Planning Policy Framework and	Clyde and Co and Icen Projects Ltd suggested that the Environmental Report should not speculate on the ability of the duty to co-operate and cross authority working to be effectively delivered –	Comment noted. The following text from section 4.5 and 4.6 highlights the uncertainties associated with the

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>the duty to co-operate.</p>	<p>referring to the political reluctance of many local authorities to actively engage in the requirement.</p> <p>The East of England RTAB and Sustainability East commented that the Environmental Report had not acknowledged the complexity of implementing the duty to co-operate and the demand for resources associated with this. There have already been examples of local authorities that have differing interests not working collaboratively resulting in new development being less sustainable than it would have been with the advantage of more formal joint working. They added that the Report had not mentioned the continuing work of the East of England Waste Technical Advisory Body and the East of England Aggregates Working Party. Both of these bodies formerly fed into the development of the Regional Strategy and were facilitated by the Regional Strategy architecture, including the staff of the Regional Assembly. With respect to minerals, it is not clear that the National Planning Policy Framework sets out a policy framework to support a sufficient supply of materials to provide for the infrastructure in the absence of a regional apportionment and this statement should be</p>	<p>duty to cooperate in the short and medium term:</p> <p><i>'In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create disparities which are difficult to reconcile without significant interventions.</i></p> <p><i>The effects of revocation of policies which provide strategic direction whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites will be more uncertain until all participating local authorities define, agree and implement the duty to co-operate and then reflect them in their adopted plans.</i></p> <p><i>Whilst the duty to co-operate could well address a wide range of strategic issues, there is uncertainty as to how this might work both by topic and geographically. Some issues such as renewable energy, biodiversity enhancement or</i></p>

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		properly justified.	<i>landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.'</i>
34.	Reliance on the National Planning Policy Framework and the duty to co-operate.	CPRE agreed that the removal of Regional Strategies may allow better discussions between authorities across regional boundaries but they were not convinced in general that the current approach provides enough of a strategic steer.	<p>Comment noted.</p> <p>Page 109 of the Environmental Report makes a similar point '<i>under revocation there is also the opportunity for adjacent authorities in previously different regions to explore joint working which may help address some of the potential issues that could arise</i>'.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p>
35.	Reliance on the National Planning Policy Framework and the duty to co-	Friends of the Earth considered that the capacity of water companies and the Environment Agency to deal with 47 uncoordinated local plans and 10 mineral and waste plans will make it very difficult to deal with water stress for the region as a whole.	<p>Comment noted.</p> <p>The Environmental Report (in the NTS and in section 4.2, 4.3, 4.5 and 4.6) notes the significant negative effects is in relation to water resources arising from development associated with policies</p>

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	<p>operate.</p>	<p>They considered that specific, tighter standards on water use must apply across this region, and the National Planning Policy Framework currently does not contain the means to ensure that this happens. The Government needs to identify ways of ensuring that the cumulative impacts of decisions are properly understood at the point of decision-making on plan-making and individual applications. They considered that the Environmental Report should have identified the guidance necessary for the Department for Communities and Local Government to issue in order for co-operation to work across the region and with London on the issues identified as key e.g. renewable energy, transport, water resources, housing etc.</p> <p>CPRE commented that the report had concluded that water stress will be a problem under all its scenarios although clearly the more localised approach has yet to be tested. The report should have also acknowledged that whatever mitigation might be undertaken, the Government and local authorities must address the root cause of the problem, that is to say the development pressure.</p>	<p>for housing and employment provision. Water companies will engage with local authorities in regard of the water resource management plan (which will itself be subject to a Strategic Environmental Assessment and Habitat Regulations Assessment) and invite comment during consultation during the draft plan stage. Within the process of water resource planning, water companies need to consider the role and broad location of large scale infrastructure. Such infrastructure requirements will be considered by water companies in the current 2014 water resource management planning process; however, if such an infrastructure option is identified as the preferred one and subsequently adopted in the final Water Resource Management Plan, the likely substantial local effects (such as land take, soil loss, material use, resource sterilisation and landscape changes) will need to be considered as part of any individual planning application, consistent with Local Plan policies and may well be subject to statutory environmental assessments. Water companies have an opportunity to work with local authorities on water infrastructure implications as part of</p>

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			<p>Local Plan preparation.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p>
36.	<p>Reliance on the National Planning Policy Framework and the duty to co-operate.</p>	<p>EDF Energy referred to the role that smaller scale energy infrastructure will play in meeting the Government's statutory energy and climate change objectives. They therefore welcomed the integration and consolidation of policies that help to promote the objectives of the National Planning Policy Framework.</p>	<p>Comment noted.</p>
37.	<p>Reliance on the National Planning Policy Framework and the duty to co-operate.</p>	<p>Renewable UK considered that Government should provide guidance to Local Planning Authorities on the duty to co-operate. They also recommended that Government establish a research programme to evaluate the effectiveness of the duty to co-operate in delivering a range of national outcomes (particularly on renewables infrastructure). They commented that they are</p>	<p>Comment noted.</p> <p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 4.2 of the PAS) which included the finding concerning issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		already seeing some negative local policies which seek to restrict the deployment of wind energy. This is a misinterpretation of the intent of the National Planning Policy Framework and the accompanying lack of guidance is creating confusion as to the purpose of local plans and the need for Local Planning Authorities to plan positively for renewable energy.	scale, may not have their full potential realised.
38.	Reliance on the National Planning Policy Framework and the duty to co-operate.	The Woburn Sands and District Society concurred with the report that there is little if any significant difference in environmental effect against the criteria used, between retention, revocation or partial revocation of the Regional Spatial Strategies in the medium or long term due to the immediate implementation of the National Planning Policy Framework, indeed in some areas of policy the National Planning Policy Framework strengthens Regional Spatial Strategy commitments. Even in the short term there is very little difference, although there may be some confusion between retained Regional Spatial Strategies and the in force National Planning Policy Framework.	Comment noted.
39.	Individual Topics	Natural England commented that the justification for not undertaking Habitats Regulations	Section 1.4 of the updated Environmental Report addresses the requirements of the Habitats

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		<p>Assessment within the report is not clear. They said that, if the reason is that the Habitats Directive does not apply to the revocation of plans, then the report should state this. They noted that a Habitats Regulations Assessment should be carried out for any plan or project which is likely to have a significant effect on a European site. <u>Natural England also questioned whether the mitigation measures considered in the report would be sufficient to offset any effects on European sites</u></p>	<p>Directive and concludes that the ‘the Government’s view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive’. This conclusion was reached on the basis of a screening exercise: each Regional Strategy policy was reviewed to identify those that referred to the protection of European sites and those which are locationally specific – i.e. they direct development to a particular parcel of land. Policies that were more pervasive in nature or provided a more general requirement for a local planning authority to make provision for a certain type or quantum of development, were screened out at that stage as it is for each local planning authority to decide on a response to the pervasive policies and determine the most suitable locations for the development – taking account, where necessary, of the finding of their own Habitats Regulation Assessment.</p> <p>This exercise identified a number of policies in the East of England Regional Strategy which sought to avoid effects on European sites. These policies were generally included as mitigation for development that the Strategy itself encouraged. They were therefore considered further in order</p>

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			<p>to determine whether it could be concluded that their revocation would not have adverse effects on such sites. Consideration was given, among other things, to the fact that: (i) the ‘development policies’ in the Regional Strategy they seek to mitigate would cease to apply were the Strategy to be revoked; and (ii) that the Conservation of Habitats and Species Regulations 2010 require that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive. This exercise did not identify any likely significant effects on European sites.</p> <p>This conclusion was supported by the findings of the Strategic Environmental Assessment. Unlike the Habitats Regulation Assessment screening, which considered the relative effects of revocation compared to retention, the Strategic Environmental Assessment considered the absolute effects (and is perhaps a tougher test as a consequence). The Strategic Environmental Assessment assessed the likely effects of the revocation of the strategy, and the likely effects of retaining the strategy (and a number of reasonable alternatives involving partial</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which included biodiversity, fauna and flora). The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. The guidance on a significant effect for biodiversity includes reference to negative and sustained effects on European or national designated sites and/or protected species. No significant negative effects on biodiversity were found, nor were any significant negative effects found from reasonable alternatives. Monitoring measures have been proposed for the effects on biodiversity (as well as the other topics) to help review the effects of the decision.</p> <p>The decision not to undertake a Habitats Regulation Assessment was therefore not taken on the basis that the Habitats Directive does not apply to the revocation of a plan. The view that the revocation of the East of England Regional Strategy will have no likely significant effects requiring Habitats Regulation Assessment was</p>

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			<p>reached on the basis of the screening exercise, the conclusions of which were supported by the independent Strategic Environmental Assessment process. The mitigation considered in the Environmental Report is not intended as mitigation to meet the requirements of the Habitats Directive as no likely significant effects on European sites that require mitigation have been identified.</p> <p>The Secretary of State is therefore proceeding on the basis that the Plan to Revoke the East of England regional strategy is not likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects).</p>
40.	Individual Topics	<p>Natural England supports the conclusion on the impacts of revocation on water infrastructure and believes that a cross authority, cross sector approach to managing these impacts would be the most effective way of addressing these issues.'</p>	Comment noted
41.	Individual Topics	<p>Natural England highlighted the importance of a reduction in water levels in watercourses on biodiversity, including the designated European and domestic habitats and the Norfolk and Suffolk</p>	<p>Disagree.</p> <p>The Environmental Report (in the NTS and in section 4.2, 4.3, 4.5 and 4.6) notes the significant</p>

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		<p>Broads which enjoy the same level of landscape protection as a National Park. They expressed the view that the findings for the water topic within the Strategic Environmental Assessment were not carried across into the Biodiversity and Landscape topics.</p>	<p>negative effect in relation to water resources arising from development associated with policies for housing and employment provision. The effect of these have then be considered on other topics. For example against biodiversity in Table NTS3, it is noted that: <i>'There remain localised concerns on the effects to the biodiversity resource, particularly where habitats are water dependent, which could be impacted by secondary, cumulative, synergistic effects from the increase demands for water and the effects on the availability of water arising from the effects of climate change.'</i> These are expanded on in Table 4.5, again for the biodiversity topic, <i>'...it is recognised that there remain localised concerns on the effects on the biodiversity resource, particularly where habitats are water dependent, which could be impacted by direct or indirect effects from the increase demands for water and the effects on the availability of water arising from the effects of climate change. Anglian Water's Water Resource Management Plan seeks to balance such demands, and as it is subject to an appropriate assessment in accordance with the Habitat Directive, the likelihood of post mitigated residual effects remains small, although if they do</i></p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p><i>occur they are most likely to affect non-designated sites and their associated biodiversity.'</i></p> <p>Additional measures to mitigate any effects of changes in water demand highlighted in the Environmental Report include river basin management planning, water cycle studies, the application of policies in the National Planning Policy Framework and the Code for Sustainable Homes which are designed to secure efficient water usage. The Government's 2011 White Paper 'Water for Life' maintains the commitment for Government to work with the Environment Agency and Ofwat to provide clearer guidance to water companies on planning for the long-term and reducing demand. Collectively, these measures (in conjunction with the HRA of the draft Water Resources Plan) will ensure that significant effects on European designated sites will be avoided.</p> <p>Effects on the Landscape topic were considered; however, given that existing legislation and policy remain which includes the protection for valued</p>

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			landscapes and nationally designated areas (such as National Parks) no significant effects were identified. More detailed information is provided in Appendix E topic chapter 'A10 Landscape and Townscape', pages 215 - 234.
42.	Individual Topics	<p>English Heritage commented that since the National Planning Policy Framework does not include the map from PPG2 of green belt designations, the question remains as to whether the local plan policy is adequate to sustain this designation which was made at a national level.</p> <p>Clyde and Co and Icen Projects Ltd referred to the conclusion in the Environmental Report that revocation of the policy setting out the need for strategic reviews of the Green Belt would lead to widespread uncertain effects, whereas retention would be largely positive. They suggested that the proposed removal of the policy had already been relied upon by some local planning authorities.</p>	Comment noted.
43.	Individual Topics	<p>Friends of the Earth considered that the measures identified to fill the gap of the Regional Strategy do not adequately address the serious climate change issues faced by the region.</p>	<p>Comment noted.</p> <p>The Environmental Report notes on page 107 of Table 4.5 that <i>'The East of England could be substantially affected by the effects of climate</i></p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p><i>change.</i> The Regional Strategy contains planning policies addressing carbon emissions and renewable energy. Their scope is covered by the National Planning Policy Framework, which seeks to support the move to a low carbon future, by stating that local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions; actively support energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Specifically, local planning authorities are expected to identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supplies. Both Regional Strategy and the National Planning Policy Framework provided the framework for spatial policies on these points but devolve responsibility to local authorities.</p> <p>National energy infrastructure (as defined in the Planning Act 2008) are subject to the guidance in the Energy National Policy Statements (EN1 to EN6) which set out national policy for energy</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>infrastructure and EN-3 concerns renewables.</p> <p>Addressing the effects of climate change requires a broad range of policies and actions (of which spatial planning is one). Wider measures include responses to the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012. Collectively the legislation and policy provides the framework for government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p>
44.	Individual Topics	<p>RenewableUK proposed retaining a number of policies:- SS1 (Achieving sustainable development); Environmental Policies; Section 9: Carbon Dioxide Emissions and Renewable Energy (includes targets); ENG1 - improving energy performance in development and reducing carbon emissions, and strengthening the 10% minimum</p>	<p>Comment noted.</p> <p>Appendix D includes the assessment of retention and revocation of SS1, ENG1 and ENG2 which are summarised in Table 4.1 and Table 4.2 of the Environmental Report. The assessment identified similarly broadly positive effects for all three</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		renewable energy consumption requirement for new development included in the submission draft regional spatial strategy; and ENG2 - renewable energy generation targets, supported by indicative installed capacity values and related clarification.	policies for both retention and revocation. In assessing the effects of revocation, the range of other legislative and policy requirements (including the National Planning Policy Framework) were considered to provide continuity of the Regional Strategy policy commitments. As there were no significant negative effects arising from revocation, retention of the policies was not proposed as a mitigation measure.
45.	Individual Topics	The Town and Country Planning Association acknowledged that removing the focused centres of growth together with the brownfield target could lead to more development of unconstrained countryside, thereby giving uncertainty over effects on soil and landscape, and on air quality and greenhouse gas emissions through the greater need to travel. This uncertainty is not however translated into the comparative assessment scorings. They added that the possible difference in the location of new development should have been recognised under the water resources topic. This is a crucial environmental issue for this region which is one of the most water stressed regions of England. This is also the one topic where significant	Comment noted. Appendix D contains the assessment of each of the strategies for the sub-regions identified in the Regional Strategy and are also reflected in the assessments of housing and employment land provision. Including within the policy assessments in Appendix D are comments such as ' <i>ultimately, the environmental effects will depend on the housing delivered across the region, their location and other factors such as their design</i> ' or ' <i>there will be uncertainties across all of the factors because the precise location of future employment development is unknown at this stage</i> '; despite this uncertainty the effects on water resources are recorded as a likely

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		<p>negative effects are envisaged under both the retention and revocation alternatives. They suggested that there is a much greater risk of a significant negative effect from the revocation alternative since there is a risk of more dispersed development in the absence of up-to-date local plans with the inherent difficulties of securing water efficiency in more dispersed small developments. They also disagree with the dismissal of any benefits of retaining key environmental policies like this on the grounds of potential confusion within the system (Table NTS2). They consider it would be possible to keep policies, and possibly guidance for some sub-regions, for a transitional period to provide a context for consistent local plan preparation. There was therefore a missed opportunity in testing the partial revocation alternatives, possibly due to political resistance to transitional arrangements.</p>	<p>significant negative effect as there is a lack of water resources available to meet future demands, and some existing areas already exceed sustainable abstraction limits. The significant negative effect on water resource is then recorded in the Section 4.2, 4.3, 4.4, 4.5 and the Non Technical Summary of the Environment Report. Dispersed development does not affect the conclusion of a significant negative effect.</p> <p>Likely significant negative effects on water resources are identified for both retention and revocation. The Environmental Report references the range of measures concerning water resource planning (led by water companies in the region in conjunction with the Environment Agency). These measures will be similar for both retention and revocation. Retaining Regional Strategy policies for a transitional period (as suggested) is an appropriate mitigation measure where there are significant negative effects arising from revocation but not with retention. However, this is not the case for the effect on water resource and whilst the effect is significant, it does not afford the most appropriate means of mitigation.</p>

ANNEX C

Monitoring Indicators

Table C1. Strategic Environmental Assessment topics, monitoring indicators and sources of information.

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Condition of designated sites • Threatened habitats and species • Populations of countryside birds • Surface water biological indicators 	<p>Joint Nature Conservation Committee report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p>Joint Nature Conservation Committee http://www.jncc.gov.uk/page-4241 http://jncc.defra.gov.uk/page-4239 http://jncc.defra.gov.uk/page-4238 http://jncc.defra.gov.uk/page-4235 http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</p> <p>Department for Environment, Food and Rural Affairs (Defra) http://www.defra.gov.uk/statistics/environment/inland-water/</p> <p>The Environment Agency (EA) are responsible for monitoring water quality under the Water Framework Directive</p>
Population	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Employment Information 	<p>Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> • Population • Housing and additional net dwellings • Local plan making progress and the duty to co-operate 	<p>Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region</p> <p>The Department for Communities and Local Government Business Plan monitoring</p>
Human Health	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • National Statistics – Long term illness, etc. • Crime • Deprivation • Access to and quality of the local environment 	<p>Office for National Statistics on health</p> <p>Home Office, Crime Survey for England and Wales</p> <p>Department for Communities and Local Government statistics: Indices of Deprivation</p> <p>Office for National Statistics (proposed measures of wellbeing)</p>
Soil and Geology	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Land use 	<p>Department for Communities and Local Government statistics</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Water	Annual (where information allows) trends in: <ul style="list-style-type: none"> • % of catchments with good ecological status • Water resource availability • Per capita water consumption • Number of water resource zones in deficit 	<p>The Environment Agency and the Department for Environment, Food and Rural Affairs.</p> <p>http://www.defra.gov.uk/statistics/environment/inland-water/</p> <p>Anglian Water, Essex and Suffolk, Cambridge Water, Affinity Water</p> <p>Anglian Water, Essex and Suffolk, Cambridge Water, Affinity Water</p> <p>Water Resource Plans (available every 5 years) from Anglian Water, Anglian Water, Essex and Suffolk, Cambridge Water, Affinity Water</p>
Air	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Number of Air Quality Management Areas • Number of Air Quality Management Areas were exceedances occurred. 	<p>Department for Environment, Food and Rural Affairs</p> <p>Department for Environment, Food and Rural Affairs</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Climatic factors	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Emission of greenhouse gases • Installed capacity of sites generating electricity from renewable sources (MW) • Number of properties at risk of flooding 	Department for Energy and Climate Change Statistical Release: Local and regional CO2 emissions Department for Energy and Climate Change Regional Renewable Statistics (from the RSTATS (Renewable Energy Statistics) database and REPD (the Renewable Energy Planning) database, https://restats.decc.gov.uk/cms/welcome-to-the-restats-web-site/ Environment Agency
Material Assets	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Volume of construction waste and proportions recycled • Volume of hazardous waste • Volume of controlled wastes and proportions recycled 	Environment Agency Environment Agency Environment Agency

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> • Volume of minerals extracted 	East of England Mineral Planning Authorities'
Cultural heritage, including architectural and archaeological heritage	Annual (where information allows) trends in: <ul style="list-style-type: none"> • % of heritage assets of different types that are at risk 	English Heritage 'Heritage at risk report'
Landscape and Townscape	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Change in Areas of Outstanding Natural Beauty (area, threats and quality) • Changes in Conservation Areas • Percentage who are very or fairly satisfied with local area • Trend in number of vacant dwellings 	National Association of Areas of Outstanding Natural Beauty English Heritage (if 2003 survey repeated) Office for National Statistics (proposed measures of wellbeing) Department for Communities and Local Government http://www.communities.gov.uk/documents/housing/xls/1815794.xls

