



Environmental report on the revocation of the East of England Plan

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This Environmental Report is a consultation document on the likely significant environmental effects of revocation of the East of England Plan (the regional strategy in force for the East of England). Responses on any aspect of the report are invited by Friday 20 January 2012.

A summary of responses to this consultation paper will be published on the DCLG website. Unless you specifically state that your response, or any part of it, is confidential, we shall assume that you have no objection to it being made available to the public and identified on the DCLG website. Confidential responses will be included in any numerical summary or analysis of responses.

Responses and comments about this consultation may be sent by email to SEAConsultation@communities.gsi.gov.uk or by post to:

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Environmental report on revocation of the East of England Plan

Non-technical summary

This is a summary of the Environmental Report on the proposed revocation of the Regional Strategy for the East of England (“the Plan”), published in 2008.

Content and objectives and relationship to other plans and programmes

The Plan was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, to provide a broad development strategy for the region for 15 to 20 years. In particular, it sought to reduce the region’s impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth up to and beyond 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.

Its revocation is proposed under the Localism Bill, currently before Parliament, in order to give authorities at local level more freedom in their decisions, both through development plans and decisions on planning applications, in the light of local needs and preferences.

Revocation of the Plan should be seen in the wider context of Government policies and legislation to protect and enhance the natural and historic environment, tackle climate change and secure the sustainable use of natural resources.

Environmental conditions, trends and problems and areas likely to be affected

The Environmental Report, including the regional commentary, is largely based on the data and evidence provided in the East of England Plan and the assessments produced to support its preparation. Where possible the data has been updated and from the data available it is considered unlikely that the overall state of the environment in the East of England has changed significantly since publication of the Plan.

The East of England is characterised by a number of medium-sized towns and cities, and extensive rural areas, together with a largely low-lying

coastline. It includes the Norfolk and Suffolk Broads, which has a status equivalent to a national park, as well as several designated areas of outstanding natural beauty and two sections of heritage coast. The East of England is rich in habitats and wildlife and has a high quality environment. However, there has been degradation in biodiversity as a result of habitat fragmentation.

The East of England is the driest English region and one of the fastest growing in population terms. Water resources are limited and there are already water supply issues in parts of the region. At the time the Plan was prepared a significant number of watercourses in the East of England did not currently meet the targets required by the Water Framework Directive to achieve 'good' status. Less rainfall resulting from climate change could reduce water resources by 10 to 15 per cent on an annual average basis, and could reduce river flows by 50 to 80 per cent. The region also contains many coastal and other low-lying areas at risk from flooding.

There is pressure on landscape character due to development and other human activity including intensive agriculture. The East of England has a high quality historic built environment, including historic city centres and market towns.

The East of England benefits from its position close to London and links to Europe. Economic activity and employment rates are generally relatively high. However, some towns and their surrounds suffer from significant deprivation with relatively high unemployment, and disparities in health and wealth.

The East of England's rural population has increased rapidly and 44 per cent live in rural areas. But access to services in rural areas is lower than the UK average and there is an acute shortage of housing in many rural areas.

Environmental protection objectives

Environmental objectives reflected in the Plan include obligations under international commitments, such as on climate change under the Kyoto Protocol, from European Directives including those aimed at protecting the natural environment, and from domestic policy.

Likely significant effects on the environment

The revocation of the Plan would decentralise planning powers to local authorities, freeing them to work with their local communities to deliver sustainable development. To support them in both delivering for their local communities and addressing strategic cross-border issues, the Government is proposing a duty on public bodies to co-operate on planning concerns that cross administrative boundaries. Local authorities will be expected to work collaboratively with other bodies to ensure that strategic priorities across local

boundaries are properly co-ordinated and clearly reflected in individual local plans. They will be expected to demonstrate that this is the case when their local plans are examined in public.

The environmental effects of revoking the Plan would reflect future decisions by local authorities, taken individually and collectively. Whilst the environmental effects cannot therefore be predicted in detail at this point, it is clear that the revocation of regional strategies and their top-down targets will provide opportunities for securing environmental benefits because their revocation would remove certain current policies which present a threat to local environments. For example, revocation would remove the top-down pressure on local authorities to review the extent of their Green Belt. Across England this would have been likely to effect more than 30 areas. Protecting the Green Belt brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.

In overall terms, it is reasonable to anticipate that decisions taken locally will look to maximise positive environmental outcomes for the local area. However, even if there were circumstances where this was not the case, strong protections for the environment set out in national planning policy and, in many cases, provided for by national and European legislation means it is highly unlikely that there would be any significant adverse environmental effects resulting from the revocation.

Methods used and difficulties encountered in assessment

This assessment has been carried out in line with the process laid down in the Regulations which transpose the European “Strategic Environmental Assessment” Directive into domestic law.

The assessment has taken as a starting point the assessments carried out when the Plan was being prepared. A broad assessment has then been made of the Plan’s objectives, its policies and predicted environmental effects (both adverse and beneficial), and how these effects might be changed if the Plan was revoked. The assessment examines aspects of the Plan which might be expected to lead to significant environmental effects.

Monitoring

Local authorities will continue to be responsible for monitoring the effects of implementing their own plans, in partnership with agencies which monitor specific impacts or conditions.

Chapter 1

Introduction

- 1.1 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”. Its objective is to make local spatial plans, drawn up in conformity with national policy, the basis for local planning decisions. The Government proposes that regional targets will be replaced with a more localist planning system together with incentives to encourage local authorities and communities to increase their aspirations for housing and economic growth. Local communities will be freed to deliver sustainable development in a way that allows them to control the way in which their villages, towns and cities change. The Localism Bill therefore contains provisions to repeal Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies, and to revoke the existing regional strategies by order following Royal Assent.

Policy context

- 1.2 The revocation of regional strategies should be seen in the context of other relevant Government policies and associated legislation aimed at protecting the natural and built environment. In particular, the Government has recently published for consultation a new National Planning Policy Framework. The Government has made it clear that the Framework will maintain existing environmental protections, but will streamline and simplify existing national planning policy so as to make it accessible to all users.
- 1.3 The Framework retains protection and improvement of the natural environment as core objectives for local planning and development management. It 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.
- 1.4 The Framework also contains a new Local Green Space designation to protect locally significant green areas, and including playing fields and open space, reflecting the importance of these areas to the health and happiness of local communities. The protection of heritage and the built environment is also a stated objective of the Framework which also emphasises the importance of design of the built environment.

- 1.5 The Framework proposes new stronger controls on peat extraction, preventing the extension of existing peat extraction and the creation of new sites. Policies to support the development of renewable and low carbon energy – critical to the reduction of carbon emissions, also form a key part of the draft Framework. In addition the Framework maintains policy to ensure we can adapt to an already changing climate by ensuring that strong protections remain in place to prevent the building of inappropriate development in flood risk areas or areas subject to coastal change.
- 1.6 The new National Planning Policy Framework sits within a broader set of national policy and legislation. For instance the Natural Environment white paper, published in June 2011, sets out the Government's vision for the future of the natural environment in England, and how natural value will be protected through the planning system.
- 1.7 In addition the Government is fully committed to meeting the targets for reducing carbon emissions in the Climate Change Act 2008, and to meeting its binding renewable energy target of 15% of all energy to come from renewable sources by 2020. The Annual Energy Statement, published in July 2010, and more recently the Carbon Plan, published in March 2011, set out the steps being taken to cut carbon emissions and deliver affordable, secure and low-carbon energy.
- 1.8 The Climate Change Act 2008 also created a framework for building the UK's ability to adapt to climate change. The Government is due to publish in January 2012 a UK wide climate change risk assessment, which will allow the Government to understand the level of risk posed by climate change. A national adaptation plan, setting out Government priorities for adaptation and policies and proposals for achieving those objectives, is due to be published in spring 2013.
- 1.9 Lastly there are numerous international obligations that contribute to the protection of our built and natural environment including international conventions as well as European Directives.

Background to regional strategies

- 1.10 The background to regional strategies is as follows:
 - The Town and Country Planning Act 1947 required local planning authorities to draft local plans setting out policies for the development and use of land. Prior to the Town and Country Planning Act 1968 which introduced county structure plans to co-ordinate and guide local plans the focus of strategic planning was mainly at the regional level. A number of regional plans were prepared from the 1940s onwards and there were initiatives to link land use planning and regional economic development.

- In 1988 regional planning guidance was introduced to provide a strategic framework for county structure plans. Regional planning guidance was not statutory and therefore structure plans and local plans were not required to be in conformity with it.
- The Planning and Compulsory Purchase Act 2004 introduced a two tier statutory spatial development plan system consisting of regional spatial strategies and local development frameworks. The counties retained statutory planning powers for minerals and waste plans, but county structure plans were abolished.
- Regional planning guidance was given the legal status of regional spatial strategies, and these were then reviewed, leading in most cases to publication of updated strategies, though only parts of the West Midlands strategy were reviewed, and the review of the South West plan was never completed.
- The Local Democracy Economic Development and Construction Act 2009 combined the existing regional spatial strategy and regional economic strategy to create a regional strategy. These came into existence on 1 April 2010 for the eight English regions outside London. The intent was for the responsible regional authority in each region to take forward a further revision of their existing regional spatial strategy and regional economic strategy combining these plans to create a single integrated regional strategy. In the interim period prior to the responsible regional authority completing the revision of the regional spatial strategy and regional economic strategy and the publication of revised regional strategy, sections 78(5) and 79 of the 2009 Act provide for the existing regional spatial strategy, renamed the regional strategy, to remain part of the formal development plan for local authorities in the region.

1.11 Regional strategies are plans for the purpose of the European Directive 2001/42/EC (the “strategic environmental assessment” Directive¹) because they are land use plans, are required by legislative, regulatory or administrative provisions and set the framework for future development consent of projects listed in Annexes I and II of the European Directive on environmental impact assessment². They are also subject to an appraisal of sustainability under the Planning and Compulsory Purchase Act 2004. Both requirements were met in a single process called sustainability appraisal, as set out in guidance issued by the then Office of the Deputy Prime Minister in 2005³.

¹ Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”, transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 no 1633) – the “Strategic Environmental Assessment Regulations”.

² Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, amended by Directives 97/11/EC and 2003/35/EC

³ “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents”, ODPM, 2005.

- 1.12 The Strategic Environmental Assessment Directive applies to plans and programmes whose preparation began on or after 21 July 2004, and to those whose formal preparation began before this date but which had not been adopted (in the case of regional strategies, published by the Secretary of State), by 21 July 2006. Sustainability appraisals incorporating strategic environmental assessment were carried out in all regions during the preparation of their regional strategies, but in the South West and West Midlands, where the process was partial or not completed, they could only be applied to the work which was actually done.

The Strategic Environmental Assessment Directive

- 1.13 The objective of the Directive is stated in Article 1: “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of certain plans and programmes with a view to promoting sustainable development”.
- 1.14 Article 5 of the Directive therefore requires that
- “An environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account its objectives and geographical scope, are identified, described and evaluated. It shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment”.
- 1.15 The Directive refers only to plans or programmes, or modifications of them, which are being prepared or adopted, and not to the revocation of a plan or programme. Therefore Strategic Environmental Assessment is not required for the revocation of regional strategies. The Government has nonetheless decided to undertake voluntary assessments of the likely significant environmental effects of revocation of the eight strategies. These assessments are being conducted in line with the procedure set out in the Directive.

The strategic environmental assessment process

- 1.16 The Strategic Environmental Assessment Directive and Regulations require authorities which prepare and/or adopt a plan or programme which is subject to the Directive to:
- prepare a report on its likely significant environmental effects;
 - consult designated environmental authorities⁴ and the public;
 - take into account the report and the results of the consultation during the preparation process and before the plan or programme is adopted; and
 - make information available on the plan or programme as adopted and how environmental considerations were taken into account.
- 1.17 An environmental report should identify, describe and evaluate the likely significant effects on the environment of implementing the plan, and those of reasonable alternatives taking into account the objectives and the geographical scope of the plan. It should include the information that may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision making process, and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.
- 1.18 Annex I of the Directive sets out the information to be provided. Paragraph (f) states that issues to be considered should include biodiversity, population, human health, fauna, flora, soil, water, air climatic factors, material assets, cultural heritage and landscape – a wide-ranging coverage encompassing social and cultural matters.

Methodology for assessment of revocations

- 1.19 The method adopted to assess the likely significant environmental effects of revoking the regional strategies has been to take as a starting point the environmental assessment components of the sustainability appraisals carried out when the strategies were being prepared. For those regions which had not completed an up-to-date strategy, use has been made of the more recent appraisals of the emerging strategy.
- 1.20 The assessments follow the format set out in Annex I of the Directive, taking into account that local plans⁵ would set the framework for

⁴ Designated as “consultation bodies” in the Strategic Environmental Assessment Regulations.

⁵ Local plans in this report are the local level component of the development plan ie development plan documents and in some instances, saved plan policies.

decisions on planning applications following the proposed revocation of the regional strategies and saved structure plan policies.

- 1.21 The approaches taken in the appraisals during preparation of the strategies differed to some extent between regions, and the assessments inevitably reflect this. However, as far as possible, a broad assessment has been made of the component policies in the regional strategy, identifying their objectives and any particular issues from the sustainability appraisals, so as to identify the key environmental issues arising in assessing the likely effects of revocation. The assessment focuses on those aspects of the Plan which might be expected to lead to significant environmental effects.
- 1.22 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. 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 reports, while more general issues are discussed below in the context of the limitations of the assessments.

Limitations of the assessments

- 1.23 Strategic Environmental Assessment is intended to be applied to the preparation and modification of relevant plans and programmes. This informs those preparing the plan and others consulted on it of the potential environmental effects of the proposals, and compares the effects of reasonable alternatives. There are now relatively well established processes available to make such assessments. In contrast, the assessment of the environmental effects of revoking a plan does not fit well with the process required by the Directive and there is no established practice.
- 1.24 The revocation of regional strategies is part of the Government's policy for a more localist planning system. This is supported by the proposed duty for public bodies to cooperate. Local authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination. Alongside the Community Infrastructure Levy, the New Homes Bonus and the local retention of business rates are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth.
- 1.25 The environmental effects of revoking the Plan will reflect future decisions by local authorities, individually and collectively. While the environmental effects cannot be predicted for certain because they depend on these local decisions, the revocation of regional strategies

and their top-down targets will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments. For example, revocation would remove the top-down pressure on local authorities to review the extent of their Green Belt. Across England this would have been likely to effect more than thirty areas. Protecting the Green Belt brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.

- 1.26 The revocation of regional strategies should be seen in the context of other relevant Government policies and associated legislation aimed at protecting the natural and built environment and this is described in the section on the policy context above. This includes the National Planning Policy Framework mentioned above, published in July for consultation, which sets out the purpose of the planning system which is to contribute to the achievement of sustainable development. It safeguards valued, national protections such as Green Belt, Areas of Outstanding Natural Beauty, and Sites of Special Scientific Interest, re-affirms protections for wildlife, bio-diversity and cultural heritage and sets out clear expectations on tackling and adapting to climate change. Additionally, the protections for the environment set out in national planning policy and, in many cases, provided for by national and European legislation means it is highly unlikely that there would be any significant adverse environmental effects resulting from the revocation.

Assessment of reasonable alternatives

- 1.27 The revocation of the regional strategies is the policy of the Government as set out in the Coalition's programme for Government⁶. The Government has introduced a clause in the Localism Bill to revoke by order individual regional strategies in whole or in part and saved structure plan policies.
- 1.28 The revocation of the eight existing regional strategies has been assessed against the reasonable alternative of not revoking them. This provides the clearest and fullest baseline scenario against which to assess the effect of revocation. Although the revocation of individual policies within each regional strategy have not been presented as separate additional reasonable alternatives, the assessment of the revocation of the East of England Plan has included the consideration of its component policies.
- 1.29 Saved structure plan policies are also included within the Environmental Report, and where any of these policies have been identified as still relevant, the environmental implications of their

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http://www.cabinetoffice.gov.uk/sites/default/files/resources/coalition_programme_for_government.pdf

revocation has been included in the overall assessment of the revocation of the East of England Plan.

Habitats Directive

- 1.30 The provisional view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive⁷. This Directive prohibits the adoption of plans or projects which have an adverse effect on the integrity of European sites unless there are no alternative solutions and the plan or project must be adopted for imperative reasons of overriding public importance. The revocation of regional strategies does not affect the legal requirement set out in the Conservation of Habitats and Species Regulations 2010 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 (Regulation 9). Part 6 of the Regulations also contains provisions which require the assessment of implications for European sites of any plan or project, which is likely to have a significant effect on it, before it proceeds in accordance with the Habitats Directive. The views of Natural England, as the statutory nature conservation body, are being sought.

⁷ Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora

Chapter 2

The East of England Plan

- 2.1 The regional strategy under consideration for revocation is the East of England Plan (“the Plan”), published by the then Secretary of State in 2008. It can be viewed at:
<http://webarchive.nationalarchives.gov.uk/20100505213210/http://www.era.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/>

Chronology of preparation of the East of England Plan

- 2.2 The Plan superseded an initial regional spatial strategy which comprised the former regional planning guidance for East Anglia (known as ‘RPG6’, 2000), together with relevant sections of the former regional planning guidance for the South East and Thames Gateway (RPGs 9, 9A & 3B/9B). The Plan is based on a draft revision to the regional spatial strategy prepared by the East of England regional assembly and submitted to the Secretary of State in December 2004. The original proposals were amended through the Secretary of State’s ‘proposed changes’, December 2006, which responded to the recommendations of the panel which conducted an examination in public of the draft ‘revision’ of the strategy between November 2005 and March 2006, and as a consequence of considering the consultation responses to those proposed changes.
- 2.3 Preparation of the Plan was informed by sustainability appraisal at both the ‘draft submission’ and proposed changes stages, incorporating strategic environmental assessment. The Secretary of State’s proposed changes were also assessed against the requirements of the European Habitats Directive⁸. In response to representations on that assessment by the regional assembly, Natural England and others, the assessment was revisited⁹ and a number of additional changes made to ensure the Plan was fully compliant with the Directive (Secretary of State’s ‘further proposed changes’, October 2007). The chronology is set out in the box below.

⁸ *East of England Regional Spatial Strategy Habitats Directive Assessment*, ERM, December 2006

⁹ *Draft Regional Spatial Strategy for the East of England: Appropriate Assessment under the Habitats Regulations*, RPS, September 2007

Document	Publication Date
Options consultation	September 2002
Options appraisal report	September 2002
Submission draft regional spatial strategy revision	December 2004
Sustainability appraisal report	December 2004
Examination in public panel report	June 2005
Secretary of State proposed changes	December 2006
Proposed changes sustainability appraisal report	December 2006
Secretary of State further proposed changes	October 2007
Further proposed changes SA report	October 2007
Final East of England Plan published	May 2008
Consolidated Sustainability/Regulation 16 Statement	May 2008

- 2.4 A High Court hearing in May 2009, found in favour of a legal challenge brought by Hertfordshire County Council and St Albans District Council against the Government on aspects of the Plan relating to development in the Green Belt around the towns of Hemel Hempstead, Welwyn Garden City and Hatfield. The Plan contained major housing growth in Hertfordshire for the period 2001-2021, including a requirement for large scale strategic housing growth and strategic Green Belt reviews around these towns. The judge's decision was confirmed in a legal order in July 2009, ordering that relevant parts of the Plan should be deleted and referred back to the Secretary of State. Planning for housing growth in these areas will now fall to the relevant local planning authorities.
- 2.5 Final policies on gypsy and traveller and travelling showpeople accommodation were inserted into the Plan in July 2009.
- 2.6 In January 2010, a further change was made with the publication of a new replacement policy 'ETG2' concerning the development of Thurrock Lakeside.
- 2.7 The East of England Plan as a whole comprises not only the main 2008 document and subsequent revisions, but also relevant parts of the 2005 Milton Keynes and South Midlands Strategy (MKSM). Further background on the MKSM Strategy is at paragraph 3.9.

Chapter 3

Environmental Report

- 3.1 This chapter presents the information which is required to be included, wherever relevant, in the Environmental Report in accordance with Annex I of the Strategic Environmental Assessment Directive. The Environmental Report, including the regional commentary, is largely based on the data and evidence provided in the Plan and the assessments produced to support its preparation. Where possible the data has been updated and from the data available it is considered unlikely that the overall state of the environment in the East of England has changed significantly since publication of the Plan.

The East of England

- 3.2 The East of England comprises the six counties of Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk, Suffolk and the unitary authorities of Peterborough, Luton, Southend-on-Sea and Thurrock. It is home to around 5.6 million people (2008), of which 82 per cent are economically active, the highest proportion in the UK. The East of England has important links to neighbouring London, the East Midlands, as well as to other parts of the South East.
- 3.3 The East of England is characterised by a number of medium-sized towns and cities, and extensive rural areas, together with a largely low-lying coastline. It includes the Norfolk and Suffolk Broads, which has a status equivalent to a national park, as well as several designated areas of outstanding natural beauty and two sections of heritage coast. The East of England also contains several major seaports, with Felixstowe being the largest and fastest growing container port in the UK, accounting for 40 per cent of the UK's container traffic.

Strategic Environmental Assessment Directive Annex I (a)

Outline of the contents and main objectives of the East of England Plan and relationship with other relevant plans and programmes

- 3.4 The Plan covers the period to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce impact on, and exposure to, the effects of climate change and to put in place a

development strategy with the potential to support continued sustainable growth beyond 2021.

3.5 The Plan's main objectives are to:

- reduce the region's impact on, and exposure to, the effects of climate change;
- address housing shortages;
- realise the economic potential of the region and its people;
- improve the quality of life for the people; and,
- improve and conserve the environment.

3.6 The main aim of the Plan is to concentrate development at the region's cities and other significant urban areas, including some market towns. These are referred to as 'key centres for development and change'. The Plan sets out the need for strategic reviews of Green Belt boundaries to meet development needs, including at Stevenage, Harlow and (in the MKSM Strategy) Luton. It requires local planning authorities to provide at least 508,000 net additional dwellings over the period 2001 to 2021 (but now reduced in Hertfordshire due to the judgment referred to at paragraph 2.4).

3.7 The Plan contains:

- a 'core' Spatial Strategy with generic policies that provide a framework for sustainable development in the region, and that complement national planning policy statements;
- policies on economic development, housing, culture, transport, environmental aspects, waste and minerals; and
- more location-specific policies on a number of sub-areas and key centres for change.

Also included is a framework for implementing, monitoring and reviewing the Plan. Further details of the policy framework are set out in the table at Annex A.

3.8 The Plan reflects the national policies on development at the time of its publication. It incorporates the regional transport strategy and also takes account of and builds on the regional economic strategy produced by the East of England Development Agency and the Regional Sustainable Development Framework, which provides a high level statement of the regional vision for achieving sustainable development.

3.9 The generic policies of the 2008 East of England Plan apply to the whole of Bedfordshire and complement relevant policies in the 2005 Milton Keynes and South Midlands (MKSM) Strategy which covers parts of three regions - the East of England, East Midlands and South East. Relevant parts of the MKSM Strategy still form part of the Regional Strategy for the East of England. The MKSM contains policies which, within the East of England, relate to two growth locations: Bedford/

Kempston/ Marston Vale, and Luton/ Dunstable/ Houghton Regis together with Leighton Linlade.

- 3.10 The 2004 sustainability appraisal of the draft regional spatial strategy considered the relevance of various plans, programmes and strategies. (The results of that analysis were set out in detail in appendix C to the sustainability appraisal report). This was reviewed and updated by the 2006 sustainability appraisal of the 'proposed changes' version and presented in detail in Annex A to the sustainability appraisal report. In particular, the report noted the following documents of relevance to the proposed changes to the regional spatial strategy:

National Programmes:

- *Climate Change: The UK Programme 2006*

National Strategies:

- *Securing the Future – Delivering the UK Sustainable Development Strategy (2005)*

Regional Strategies:

- *The East of England Regional Economic Strategy (2004)*
- *A Better Life: The role of culture in the Sustainable Development of East of England (2006)*
- *East of England European Strategy 2004-2007*

- 3.11 Neighbouring strategies include the regional strategy for the East Midlands and for the South East, both of which are also under consideration for revocation, and the London Plan. The East of England Plan has been informed by, and responds to, the relationship between the East of England and these adjacent regions.

STRUCTURE PLANS

- 3.12 In 2007 the Government wrote to local authorities under the transitional provisions of Schedule 8 to the Planning and Compulsory Purchase Act 2004 to advise them which policies from their existing structure plans would be saved after 27 September 2007. Policies were saved in the expectation that they would be replaced promptly by policies in the regional spatial strategy, or development plan documents for the relevant local authorities. Clause 97 of the Localism Bill provides for the revocation of saved structure plan policies. Where the appraisal at Annex B identified saved structure plan policies as still relevant, the environmental implications of their revocation has been included in the overall assessment of the revocation of the Plan.
- 3.13 Forty-seven structure plan policies were saved in the East of England, as listed in Annex B.

LOCAL PLANS

- 3.14 Regional strategies form part of the statutory development plan under the Planning and Compulsory Purchase Act 2004, until such time as they are revoked. Until then, development plan documents prepared by local authorities are required to be in general conformity with the regional strategy.
- 3.15 On revocation of the 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 neighbourhood plans that are prepared under the powers being brought forward by the Localism Bill. Revocation does not affect the statutory duty on local authorities to keep under review the matters which may be expected to affect the development of their area or the planning of its development.
- 3.16 A list of local plans in the East of England and their current composition is included at Annex C.

Strategic Environmental Assessment Directive Annex I (b) and I (c)

Relevant aspects of the current state of the environment of the East of England and its likely evolution thereof without implementation of the Plan

The environmental characteristics of areas likely to be significantly affected

- 3.17 A detailed review of data on baseline environmental conditions within the region (and where available at sub-regional level) was presented in the sustainability appraisal of the draft regional spatial strategy. This information was reviewed and updated for the sustainability appraisal of 'proposed changes' strategy (paragraph 3.10 and Annex B of the sustainability appraisal report). Baseline data findings showed the East of England to be rich in habitats and wildlife and to have a high quality environment. Trends in this data, however, show there to be degradation in biodiversity as a result of habitat fragmentation. Key findings on baseline conditions included the following:
- Designated sites cover some 6.6 per cent of the East of England, comprising 567 sites of special scientific interest of which many are 'European sites', that is, sites designated as special areas of conservation or special protection areas, and 'Ramsar' sites (wetlands designated for their international importance to wildlife). Some are also national nature reserves.

- The 2006 update of baseline data reported 79 per cent of sites of special scientific interest to be in favourable condition or recovering, and 21 per cent to be in an unfavourable state. Since 2001 there has been little change in the proportion of sites of special scientific interest in a favourable or recovering position. There has been little change in the region's populations of native wild bird species since 2001, though farmland bird populations have dropped by 5 per cent since 1994.
- 78 per cent of total river length in the Anglian Region was of good biological quality in 2006 (England and Wales average was 72 per cent), compared with nearly 80 per cent in 2001 and less than 60 per cent in 1990. Forty seven per cent of total river length was of good chemical quality in 2006 (the average for England and Wales was 70 per cent), compared with 58 per cent in 2001 and 17 per cent in 1990. However, a significant number of watercourses in the East of England do not currently meet the targets required by the Water Framework Directive to achieve 'good' status, and over 65 per cent do not meet the standard for phosphate.
- The East of England is the driest English region and one of the fastest growing. Water resources are limited and there are already supply and demand issues in parts of the region. In some river catchments abstraction is not reliable during dry winters and, under predicted scenarios for climate change, more frequent drought conditions are expected, leading to increased pressure on resources.
- The East of England contains many low-lying areas at risk from flooding, including the Fens, which are England's largest river floodplain. The coastline is also at significant risk from coastal flooding, including inland from The Wash. The extensive area vulnerable to flooding, combined with existing development patterns, mean that about 140,000 properties are within areas protected by existing flood defences.
- The region's landscape varies in character from the long, low-lying coastline, with beaches, dunes, saltmarsh and estuaries, to the large scale open fen landscapes, the Norfolk and Suffolk heaths, and the rolling farmland with woodland and hedgerows characteristic of much of the rest of the East of England. The region has the highest proportion of high quality agricultural land in the country. Some 7.5% of the land area is designated as nationally important landscapes. This includes the Norfolk and Suffolk Broads, which has a status equivalent to a national park, as well as four designated areas of outstanding natural beauty and two sections of heritage coast.
- The region's historic environment includes over 57,000 listed buildings, 1,735 scheduled monuments and 1,195 conservation areas. Less than 2 per cent of the region's grade I & grade II* (listed) buildings were at risk in 2007, the same percentage as in 1999.
- Carbon dioxide emissions in the East of England were averaged at 8.8 tonnes per resident in 2004, from all sources (e.g., industry,

domestic, transport). Comparable data for earlier dates is not available.

- On average 505 kilograms of household waste were produced per person in the East of England in 2003-04 (England average was 510 kilograms), an increase of 3 per cent compared with 1998-99 (the overall increase for England was 6 per cent), but a decrease from 2002-03. The East of England had the highest recycling rate of all the regions with 23 per cent of household waste recycled. Waste from London makes up the bulk of imports into the East of England.

- 3.18 This section does not include a separate description of the likely evolution of the environment without the Plan as the likely significant effects on the environment of the proposed revocation is considered in the Report as whole (bearing in mind that strategic environmental assessment normally applies to plan preparation and the requirement to look at the likely evolution of the environment is to provide a frame of reference to help shape the plan's content). It is also important to acknowledge the limitations of the baseline data as this would have changed over time. Some additional, more up to date data has not been specifically collected for the purpose of this exercise. For example, the Environment Agency's understanding of, and how it monitors, the water environment has changed significantly since 2008; and more recent data on water resources within the East of England is likely to be available in water companies' water resource management plans. Also, English Heritage now publishes on its web site statistics and trends on 'Heritage at Risk'. However, it is considered unlikely that the *overall* state of the environment in the region has changed *significantly* in the three years since publication of the Plan.

Strategic Environmental Assessment Directive Annex I (d)

Existing environmental problems relevant to the Plan and its revocation, including in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC

- 3.19 The 2004 sustainability appraisal of the draft regional spatial strategy identified a number of environmental concerns of strategic significance, notably:
- *imbalance between water demand and supply*: there are currently no further groundwater or surface water resources available to meet future demands. Some existing areas already exceed sustainable abstraction limits;

- *flooding and climate change:* 215,000 homes are under threat from river flooding; parts of the historic environment are also under threat from river flooding and coastal erosion;
- *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;
- *erosion of historic assets:* Major development, bypasses and insensitive developments have resulted in a loss of historical assets;
- *air quality, especially on main transport routes:* The region has four air quality management areas. Car use and intensive livestock units contribute to poor air quality in parts of the region;
- *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. (However, the Plan has limited influence on the demand for air travel);
- *pressures on landscape character:* The East of England's Green Belt and 22 character areas are under threat from urbanisation;
- *Waste:* 21.5 million tonnes are produced each year; the bulk is deposited in landfill. 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;
- *poor rural service provision:* Access to services in rural areas is lower than the UK average. Community vibrancy for less populated areas is low;
- *issues associated with a rural population increase:* The East of England's rural population has increased rapidly and 44 per cent live in rural areas. House prices between 2001-02 increased faster in rural than urban areas and increased development in rural areas can lead to pressure on the character of rural landscapes, increased traffic on rural roads, etc.

- 3.20 A further 2007 report on a review of the 2006 sustainability appraisal/ strategic environmental assessment findings regarding European sites, commented that the 'further proposed changes' to the strategy included minor changes to wording intended to avoid likely significant effects on these sites. There had also been more substantial changes to policies and supporting text intended to mitigate against effects on the integrity of European sites. The appropriate assessment under the Habitats Regulations found that for some of the Plan's policies the likelihood of significant effects on some European sites could not be excluded. Further assessment of the potential effects found that changes made as part of the further proposed changes would result in no likely significant effect, or that the remaining potential effects had been mitigated against.
- 3.21 The sustainability appraisal did not specifically analyse the likely evolution of relevant aspects (problems and issues) of the environment without the Plan. However, it did comment:
- "that further development on any significant scale was likely to have serious negative impacts on water resources, biodiversity, tranquillity, air quality, recreational access and congestion. The larger the volume of development the harder it would be to avoid increased flood risk, erosion of the quality and distinctiveness of settlements and the built environment, and landscape. As a broad generalisation therefore, the regional spatial strategy level of development was significantly worse for the environment than the 'business as usual' option, that is, continuing the trends of growth set out in the earlier regional planning guidance."
- 3.22 Subsequent changes (including 'proposed changes' and 'further proposed changes') to the draft Plan included policy changes to mitigate the likely adverse environmental effects of implementing the Plan. It was not envisaged that the trends and problems highlighted in the sustainability appraisal reports could be avoided or resolved solely through the Plan and it is not expected that if it is revoked they will inevitably occur, or that no action would be taken to mitigate or react to them.
- 3.23 As stated in the Plan's *Sustainability Statement* (paragraph 5.43), at the strategic level, the Plan can only provide a framework for future development. A range of more locationally specific alternatives would need to be considered and it will be for local authorities and other decision makers to assess these lower level alternatives when preparing local plans and approving individual development schemes. These, coupled to many other unrelated factors which are beyond the remit of the Plan, will play some part in determining actual outcomes.
- 3.24 In all these circumstances it was considered difficult to predict the likely evolution of the environment without the Plan, particularly given the number of wider influences on environmental trends that lie outside its scope. The sustainability appraisal report on the proposed changes

included an assessment of the cumulative effects of the Plan. It noted that:

“These effects reflect the continuation of current trends in the region It is important to note that the regional spatial strategy will contribute to these trends but that the ‘regional spatial strategy effect’ is and will probably remain difficult to isolate. ... Many of the cumulative effects reflect national as well as regional trends and will only be effectively addressed by significant changes in policy and behavioural change, by government, regulations, utilities, regional agencies, local authorities and regional business and residents.”

Strategic Environmental Assessment Directive Annex I (e)

Environmental protection objectives established at international, Community or Member State level which are relevant to the Plan and the way they were taken into account during its preparation

- 3.25 The legal and policy context applicable to the preparation of the Plan and relevant environmental protection objectives that informed its development are set out in the supporting sustainability appraisal. The way these were taken into account is explained in the appraisal. The 2004 sustainability appraisal of the draft regional spatial strategy considered the relevance of environmental objectives, including those set out in European directives and in various national plans, programmes and strategies. The results of that analysis were set out in detail in appendix C to the sustainability appraisal report. This was reviewed and updated by the 2006 sustainability appraisal of proposed changes (and presented in detail in Annex A to the sustainability appraisal report).
- 3.26 The 2004 sustainability appraisal used a framework of objectives to appraise the proposed policies in the draft regional spatial strategy. The same appraisal objectives and questions were used by the subsequent sustainability appraisal of the ‘proposed changes’ strategy. These objectives were as follows, with those considered by the sustainability appraisal to be most relevant to the Strategic Environmental Assessment Directive’s topics (Annex 1(f)) shown in bold:
1. achieve sustainable levels of prosperity and economic growth
 2. **(a) deliver more sustainable use of land**
(b) deliver more sustainable location patterns
 3. **protect and maintain vulnerable regional assets, (natural, built and historic environment)**
 4. **reduce greenhouse gas emissions**
 5. share access to services and benefits of prosperity fairly
 6. **use natural resources efficiently; re-use, use recycled where possible**

7. cut waste

8. avoid exploiting the global environment

9. revitalise town centres to promote a return to sustainable urban living.

3.27 The final *Sustainability Statement* noted that the strategic environmental assessment was undertaken at key stages throughout the regional spatial strategy process, as a component of the sustainability appraisal. At the examination in public of the draft regional spatial strategy, the sustainability appraisal report informed debate in relation to a range of matters, but was given particular prominence during the ‘Matter 1D’ debate – protection of the environment. The panel commented on the overall value of the sustainability appraisal report in the following terms:

“Our perception is that the strategic environmental assessment fulfilled its purpose in identifying environmental issues and concerns raised by the draft plan. As will be apparent throughout this report, issues raised in the strategic environmental assessment have informed the examination in public discussion and our conclusions and recommendations for improving the Plan”

3.28 The proposed changes version of the draft Plan built on the panel’s recommendations, the majority of which were accepted and, in particular, included changes aimed at strengthening aspects of environmental policy, both in relation to safeguarding environmental assets and husbanding natural resources. Where, exceptionally, the panel’s recommendations were not accepted, for example in relation to growth at Harlow, the decision took account of these additional environmental safeguards, including stronger protection for European sites.

3.29 The report of the final iteration of the sustainability appraisal responded to further policy refinements, all aimed at ensuring full compliance with the requirements of the Habitats Regulations. The ‘further proposed changes’ therefore took account of the Habitats Regulations and the sustainability appraisal was less influential at this stage. However, all the further changes were consistent with sustainability appraisal objectives for conserving biodiversity and improving protection for sites of European and international importance for wildlife.

3.30 Revocation of the plan would not mean that relevant environmental objectives are not applied or ignored. Following its revocation, responsibility for ensuring the Town and Country Planning Act regime properly contributes to the delivery of national and international environmental protection objectives would largely fall to local authorities, working where relevant, with the Environment Agency, Natural England and English Heritage. New or revised development plan documents will be subject to sustainability appraisal including strategic environmental assessment and, accordingly, local authorities will need to be able to demonstrate how they have taken account of environmental objectives.

They will also have to have regard to national planning policies, including objectives for sustainable development, and locally specific environmental considerations.

Strategic Environmental Assessment Directive Annex I (f) and (g)

The likely significant effects of the Plan on the environment

Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Plan

- 3.31 The Strategic Environmental Assessment Directive requires the assessment to consider the likely significant effects on the environment, including on a number of specific issues set out in Annex 1(f) of the Directive. In this case, the assessment considers whether there are likely to be significant environmental effects of revoking the Plan, but in the context of the continuing existence of local plans and national planning policies, together with applicable national and European legislation.
- 3.32 The aim of revoking the Plan is to promote 'localism' and free up local communities to shape the future of their areas through local and neighbourhood plans without top-down direction from a higher tier development plan. Revocation of the Plan would leave in place saved local plan policies and adopted development plan documents.
- 3.33 Following the proposed revocation of the Plan the expectation is that local authorities will continue to work together on cross boundary strategic issues. This will be supported by the new 'duty to co-operate' proposed in the Localism Bill. The duty will ensure that local authorities and other public bodies are involved in a continual process of constructive and active engagement which will maximise effective working on development planning in relation to strategic planning issues that cross administrative boundaries.
- 3.34 Local authorities will continue to be required to prepare their local plans with the objective of contributing to the achievement of sustainable development. Plan preparation will be supported by a sustainability appraisal, which incorporates strategic environmental assessment.
- 3.35 National planning policy provides the framework for local planning and development management. The Government has recently published for consultation the new National Planning Policy Framework. Combined with existing legislation including on the need for strategic environmental assessment and sustainability appraisal of development plans, as well

as appropriate assessment under the Habitats Regulations, this will ensure that local plans promote sustainable development.

- 3.36 The 2004 sustainability appraisal carried out an assessment of the options and policies set out in the draft regional spatial strategy. The comprehensive detailed findings and recommendations were set out in Appendices F and G of the sustainability appraisal report. The overall conclusions were:

“the great majority of the impacts of policies are positive. 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 the case without it.”

- 3.37 However, the sustainability appraisal/strategic environmental assessment also found that it would be extremely difficult to implement the strategy in a way that meets all its policy objectives, because of the ‘step-change’ in delivery of housing, employment and infrastructure called for in the strategy. It was considered that the planned level of growth would help to achieve some of the economic and social goals for the East of England, but it was also likely to lead to a number of significant adverse impacts on the environment.

- 3.38 As part of the process of undertaking the proposed changes stage of the strategy, a further sustainability appraisal integrating the requirements of the Strategic Environmental Assessment Directive was commissioned. The sustainability appraisal of the proposed changes supplemented the sustainability appraisal of the earlier draft strategy. The subsequent (2006) sustainability appraisal report did not contain a separate environmental report dealing with issues pertaining solely to a strategic environmental assessment, but it did contain the components which would make up the environmental report.

- 3.39 The sustainability appraisal of the proposed changes version appraised:

- significant changes to policies contained in the draft strategy that were substantially modified for that version;
- new policies developed in response to the ‘examination in public’ panel’s report, or to respond to other needs that arose (e.g. changes/developments in government policy).

- 3.40 The detailed appraisal of these policies was presented in Annex C of the sustainability appraisal report. The sustainability appraisal found that the level of growth proposed in the proposed changes would not lead to large-scale significant effects beyond those identified by the sustainability appraisal of the draft strategy. There would be an incremental addition to those effects but this would be small, reflecting the level of additional growth at regional scale in the proposed changes. The key areas where there was a potential for likely significant effects remained:

- pressure on water services;
- transport, infrastructure and transport emissions;
- protection of biodiversity; and
- the quality of the East of England's environment.

3.41 To these, based on research and analysis carried out since the sustainability appraisal of the draft, should be added:

- waste arisings and waste management; and
- resource efficiency and resource consumption, especially energy consumption and carbon emissions.

3.42 For clarity and to show compliance with the Strategic Environmental Assessment Directive, the likely significant effects on the environment arising from the proposed changes were drawn out and reported in section 9 of the sustainability appraisal report. These were summarised against the topics/issues mentioned in the Strategic Environmental Assessment Directive Annex I(f) in table 9.1.

3.43 The sustainability appraisal undertaken in 2006 concluded that the additional cumulative effects of the proposed changes (in comparison to the draft strategy) were small at the regional scale, as the increment of additional growth was relatively small in comparison with the level of growth proposed in the earlier draft. The full results of the cumulative impact assessment were presented in section 8.2 of the sustainability appraisal report.

3.44 The report commented that these effects reflect the continuation of current trends in the East of England. It was noted that:

“the regional spatial strategy will contribute to these trends but that the ‘regional spatial strategy effect’ is and will probably remain difficult to isolate. ... Many of the cumulative effects reflect national as well as regional trends and will only be effectively addressed by significant changes in policy and behavioural change, by Government, regulations, utilities, regional agencies, local authorities and regional business and residents.”

3.45 The *Sustainability Statement* accompanying the final published version of the Plan commented that:

“...at each iteration of the sustainability appraisal the consideration of environmental effects, in tandem with the consideration of social and economic effects, has been influential in shaping the evolution of the preferred strategy. [paragraph 5.42] ... Overall the [previous] government considers that the published revision to the regional spatial strategy provides a sustainable framework which responds appropriately to social, economic and environmental drivers, both within the region and beyond. The Plan should play its part in significantly improving the quality of life for existing and future residents across the region over the

remainder of the Plan period. The high level nature of the strategy means that there will always be some residual uncertainty around likely outcomes ...” [paragraph 5.44].

- 3.46 The policies of the Plan which seek to direct major or significant development to specific locations and that have the most potential to cause significant environmental effects, appear to be the following:
- policy SS3 and the associated policies in section 13: sub-areas and key centres for development and change;
 - policy SS5: priority areas for regeneration;
 - policies E1-E5: job growth and economic development;
 - policy H1: regional housing provision;
 - policies H3 & H4 (July 2009): provision for gypsies and travellers and showpeople;
 - policy T6: strategic and regional road networks;
 - policy T10: freight movement.
- 3.47 In addition to the above, there are some policies that seek to influence and/or imply the locations for specific types of development, including:
- policies WM3 & 4: imported waste and regional waste apportionment
 - policy M1: land won aggregates and rock
- 3.48 Other policies in the Plan are either high-level, generic, or more aspirational in nature, and/or are intended to provide environmental protection or mitigation, generally reflecting national planning policies. It is recognised however, that there are linkages between all policies in the Plan.
- 3.49 A summary of the environmental effects identified in the sustainability appraisal of the Plan are set out in Table 1 overleaf, with an assessment of any likely significant environmental effects of its proposed revocation. This draws from the more detailed assessment of policies set out at Annex A. The Table is set out by reference to the issues listed in Annex 1(f), with the exception of material assets. This has been considered where relevant as part of the assessment of the other Annex 1(f) issues rather than being dealt with separately.
- 3.50 The assessment's conclusion is that revocation of the Plan is unlikely to have any significant environmental effects. In reaching this conclusion the assessment has considered as appropriate the interrelationship between the Annex 1(f) issues and taken into account likely significant effects from secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, both positive and negative.

Table 1: Summary assessment of the environmental implications of East of England Plan policies compiled from the sustainability appraisal and likely significant effects of revocation of the Plan

Strategic Environmental Assessment Topic	Implications of Plan policies	Likely significant environmental effects of revocation
Biodiversity, flora and fauna	<p>The sustainability appraisal found that implementation of the policies in the ‘proposed changes’ version of the regional spatial strategy including the provisions concerning Natura 2000 sites (special protection areas, special areas of conservation), should mean that there were no likely significant effects from the regional spatial strategy. This conclusion was shared by the appropriate assessment of the regional spatial strategy.</p> <p>However, because of the level of growth proposed, the sustainability appraisal concluded that there remained a potential for likely significant effects, including on biodiversity. The appropriate assessment of proposed changes found potential for effects on the integrity of some special area of conservation/special protection area sites. But following further proposed changes, it was concluded that these changes were sufficient to ensure the regional spatial strategy would have no</p>	<p>Revocation is unlikely to have any significant environmental effects on biodiversity, flora and fauna in the East of England.</p> <p>Plan policy ENV3 generally reflects national policies on biodiversity and geodiversity, and refers to biodiversity action plan priorities and targets. Other policies also largely reflect national policies, including SS9 (the coast), ENV1 (green infrastructure) and ENV5 (woodlands).</p> <p>While the sustainability appraisal and appropriate assessment did not find any likely significant effects on biodiversity/wildlife, it was suggested that there remained some potential for significant (adverse) effects, because of the level of housing and employment growth proposed focused on the key centres for development and change.</p> <p>However, local authorities are expected to continue to work together, and with communities, on conservation, restoration and enhancement of the natural environment – including biodiversity, geo-diversity and landscape interests. Authorities should continue to draw on available information, including data from partners, to address cross boundary issues such as the provision of green</p>

	<p>effect on the integrity of European Sites, except for the potential for ‘in combination’ effects with the South East Plan on the Ouse Washes and Portholme Special Area of Conservation, and potential effects of development in the Milton Keynes South Midlands Growth Area.</p> <p>The final Sustainability Statement (May 2008) notes the strengthening of protection for biodiversity and geodiversity.</p>	<p>infrastructure and wildlife corridors.</p> <p>National planning policy on biodiversity, landscape and heritage will still apply. Local authorities can still develop local biodiversity action plans in cooperation with Natural England.</p> <p>Nationally and internationally designated sites will continue to be subject to statutory protection. Under the Habitats Regulations, where necessary, local authorities are required to undertake habitats regulation assessment of their local plans. Other than in exceptional circumstances they must not grant planning permission for a proposed development unless they have certainty that it will not, either individually or in combination with other plans or projects, adversely affect the integrity of the European site concerned.</p>
<p>Population</p>	<p>The sustainability appraisal found that the likely significant effect on population of the ‘proposed changes’ regional spatial strategy was expected to be generally positive. The strategy aims to improve the quality of life of new and existing residents of the East of England. It also aims to address existing deficiencies and deficits in social environmental and transport infrastructure. The proposed changes also highlight where deprivation and social exclusion need to be tracked.</p>	<p>Revocation is unlikely to have any significant environmental effects in relation to the population.</p> <p>There is no reason why positive effects cannot ensue through a combination of local authority intervention, third sector action and responses from the market outside the Plan’s scope. Local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. The proposed duty to co-operate is expected to play a key role in this and Local Enterprise Partnerships can also play a key role in assisting local authorities to deliver.</p>

		<p>The Government's economic white paper (published October 2010) sets out the Government's vision for local growth, shifting power away from central government to local communities, citizens and independent providers. This means recognising that where drivers of growth are local, decisions should be made locally.</p>
Human Health	<p>The sustainability appraisal found that the likely significant effects of the proposed changes version of the regional spatial strategy were likely to be generally positive. The strategy addresses quality of life issues and promotes sustainable communities. It recognises the need to tackle the social determinates of health in some deprived areas of the region.</p> <p>However, because of the level of growth proposed, the sustainability appraisal concluded that there remained a potential for likely significant effects, including on transport emissions and the general quality of the region's environment.</p>	<p>Revocation is unlikely to have any significant environmental effects on human health.</p> <p>National policies relevant to health and wellbeing, which underpins the concept of sustainable development, should be reflected in local plan policies for the health and well being of local communities.</p> <p>Local plans will continue to be subject to sustainability appraisal and this includes the impacts on human health.</p> <p>Also, various European Union and national standards for reducing air and water pollution and greenhouse emissions being taken forward by local authorities and other agencies should help contribute to the improved health of the population.</p>
Soil	<p>The sustainability appraisal commented that the strategy seeks to focus development around existing urban areas. It also seeks to protect regional landscape and environmental assets and use brownfield sites as a priority. The</p>	<p>Revocation is unlikely to have any significant environmental effects on soils.</p> <p>Soil impacts are locally and appropriately considered at the local level. The revocation of the Plan should not have an effect on local authorities' capacity and responsibilities</p>

	<p>significant effects of the proposed changes are likely to be positive.</p>	<p>to deal with contaminated land including securing remediation as part of the redevelopment of brownfield and contaminated land. For development on agricultural land, local authorities should continue to have regard to national planning policies, including policies to protect the best and most versatile land to support food production. Policies to reduce urban sprawl including Green Belt will help protect soils.</p>
<p>Water</p>	<p>The sustainability appraisal of proposed changes commented that the emphasis on water efficiency and improved, integrated water resource management within the region is an important positive change. Improved efficiency and more effective management of consumption are also important and positive.</p> <p>However, the sustainability appraisal found the likely significant effects of the proposed changes on water to be uncertain. The East of England faces water constraints and because of the level of growth proposed, the sustainability appraisal concluded that there remained a potential for likely significant effects, including pressure on water services. Ongoing research in the East of England should help to identify the ways to avoid significant effects.</p>	<p>Revocation is unlikely to have any significant environmental effects on water.</p> <p>Policies WAT1-3 promote joint/partnership approaches to achieving improvement in water efficiency, water infrastructure and integrated water management, including addressing issues of water supply, water quality, wastewater treatment and flood risk.</p> <p>Water resources are one of the main issues of concern for this region, which is the driest in England. There is a lack of water resources available to meet future demands, and some existing areas already exceed sustainable abstraction limits. The sustainability appraisals of the draft and proposed changes stages of the Plan were uncertain/inconclusive about the impacts on water resources. However, the final Sustainability Statement suggests that changes made to the final version of the Plan should mitigate any potential adverse effects.</p> <p>Even without the Plan, joint and partnership working between the Environment Agency, water industry bodies,</p>

	<p>The final Sustainability Statement notes that policy WAT1 reflects the need for achieving improved resource efficiency in tandem with new development; and WAT2, a new policy setting out a co-ordinated approach to water infrastructure planning, including a requirement for water cycle studies, which takes proper account of environmental constraints. It also notes that housing provision policy (H1) recognises the need to take account of water supply and waste water infrastructure requirements when bringing forward land for housing.</p> <p>The Plan was adopted without consideration of the Water Framework Directive (WFD). This needs to be considered in the preparation of local plans, whether or not the Plan is revoked.</p>	<p>local authorities and others must continue in line with the new duty to cooperate in order to deliver water efficiency, management and infrastructure benefits.</p> <p>Statutory requirements under the Water Framework Directive will continue to apply and be implemented principally in accordance with River Basin Management Plans, supported by national planning policy. Local authorities should work co-operatively with other authorities, the Environment Agency and water companies to ensure the spatial planning aspects of River Basin Management Plans are applied and the distribution and scale of growth have regard to the capacity of waste water treatment works and WFD requirements.</p> <p>The Flood and Water Management Act 2010 contains provisions for regional working and co-operation such as the establishment of regional flood and coastal committees and the bringing together of lead local flood authorities, who will have a duty to cooperate, to develop local strategies for managing local flood risk. In addition, the Flood Risk Regulations 2009 impose a duty on the Environment Agency and lead local flood authorities to take steps to identify and prepare for significant flood risk.</p>
Air	<p>The sustainability appraisal of proposed changes found there were likely to be both positive and negative effects connected with the changes. Positive effects on air quality from policies to promote public transport, but negative effects would be</p>	<p>Revocation is unlikely to have any significant environmental effects on air quality.</p> <p>National planning policies, including those on air quality, sustainable development and transport, will continue to apply and inform local plan policies. The benefits of more</p>

	<p>likely to are likely to arise from increased transport emissions from traffic growth. Because of the level of growth proposed, the sustainability appraisal concluded that there remained a potential for likely significant effects, including in relation to transport emissions.</p>	<p>sustainable transport provision and infrastructure and sustainable locations for development should be supported locally through land use and transport planning. Furthermore, in areas of poor air quality - including those within, or adjacent to, an Air Quality Management Area - local authorities will need to work closely with relevant partners to ensure that development has taken proper account of relevant air quality matters.</p>
<p>Climate Factors/ Change</p>	<p>The sustainability appraisal of proposed changes found there were likely to be both positive and negative effects connected with the changes. Positive effects on greenhouse gas emissions from policies to promote public transport, improve energy efficiency, increase the use of renewables etc. The negative effects would be likely to arise from increased transport emissions from traffic growth. Because of the level of growth proposed, the sustainability appraisal concluded that there remained a potential for likely significant effects, including in relation to transport emissions, and energy consumption and carbon emissions.</p> <p>The final Sustainability Statement notes the inclusion in policy T1 of a new high level objective to manage travel behaviour and demand 'with the aim of reducing road traffic growth and ensuring the transport</p>	<p>Revocation is unlikely to have any significant environmental effects on carbon emissions.</p> <p>National planning policy expects local authorities to plan for new development in locations and ways that reduce greenhouse gas emissions, and minimise future vulnerability in a changing climate. Local authorities are expected to support the delivery of renewable and low-carbon energy and energy efficiency measures.</p> <p>Following revocation of regional strategies, local authorities are expected to continue to work together across administrative boundaries and with the Environment Agency to plan development that properly minimises the effects of climate change, particularly from flooding and coastal change. For flooding matters, local authorities already have a duty to cooperate under the Floods and Water Management Act 2010. This contains provisions that cover regional working and co-operation such as the establishment of Regional Flood and Coastal Committees and the bringing together of lead local flood authorities (unitary and county councils), who will have a</p>

	<p>sector makes an appropriate contribution to the required reduction in green house gases', and an outcome of 'reduced greenhouse gas emissions'. It also notes the inclusion of new policy (ENG1) for improving energy performance in development and reducing carbon emissions, and strengthening the 10% minimum renewable energy consumption requirement for new development included in the submission draft regional spatial strategy; and inclusion (in ENG2) of renewable energy generation targets.</p>	<p>duty to cooperate, to develop local strategies for managing local flood risk. In addition, the Flood Risk Regulations 2009 imposes a duty on the Environment Agency and lead local flood authorities to determine whether a significant flood risk exists in an area and if so to prepare flood hazard maps, flood risk maps and flood risk management plans.</p>
<p>Cultural Heritage</p>	<p>The sustainability appraisal of the draft regional spatial strategy found the draft plan policies on culture to be broadly positive.</p> <p>However, the sustainability appraisal of the proposed changes found the likely significant effects on cultural heritage were uncertain. This is because although the proposed changes recognise the importance of the historic environment, their effects on historic environment assets were difficult to assess at regional level.</p>	<p>Revocation is unlikely to have any significant environmental effects on cultural heritage.</p> <p>The most important cultural heritage sites are subject to statutory protection. This is supported by national planning policy for the protection and conservation of the historic environment. Following revocation of regional strategies, local authorities would still need to continue to work together on conservation, restoration and enhancement of the heritage and historic environment.</p> <p>In planning for the historic environment, local authorities should continue to draw on available information, including data from partners, to address cross boundary issues; they should also continue to liaise with English Heritage to identify and evaluate areas, sites and buildings of local cultural and historic importance, and explore ways for the</p>

		management, enhancement and regeneration of those areas.
Landscape	<p>The sustainability appraisal of the draft plan had expressed concerns over the scale and levels of growth envisaged, which risked significant adverse effects, including erosion of the quality and distinctiveness of settlements and the built environment and landscape in some areas, particularly the south of the region. There was also concern that the approach to increasing capacity for road traffic could result in extra roads which could consume land and damage landscape.</p> <p>However, the sustainability appraisal found that the proposed changes recognise the extent and importance of the region's landscape assets, and the need for development to be sympathetic to the characteristics of the landscape.</p>	<p>Revocation is unlikely to have any significant environmental effects on landscape.</p> <p>National planning policies provide for countryside protection, including protections for valued landscapes and nationally designated areas (which are also subject to statutory protection).</p> <p>Potential significant effects on landscapes should be identified by local authorities through the strategic environmental assessments of their local plans, environmental impact assessment and appropriate assessment of specific projects.</p> <p>In addition, the revocation of top down housing targets will remove pressure to review Green Belt to accommodate growth. The revocation of the plan could therefore potentially deliver associated environmental benefits including for landscape. It is for local authorities to review their Green Belt boundaries, having regard to government's national policy on Green Belts. Current policy in Planning Policy Guidance 2: Green Belts and the draft National Planning Policy Framework contain strong policies protecting the Green Belt from inappropriate development.</p>

Strategic Environmental Assessment Directive Annex I (h)

Outline of reasons for selecting the alternatives dealt with and description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information

- 3.51 The reasonable alternatives to revocation of the Plan and difficulties in undertaking the assessment are considered in Chapter 1.

Strategic Environmental Assessment Directive Annex I (i)

Description of the measures envisaged concerning monitoring

- 3.52 Having regard to the fact that the revocation of the Plan would mean there would no longer be a plan whose implementation could be monitored, and it is not proposed to require monitoring at a regional level, this Environmental Report does not set out any envisaged measures for monitoring. This does not mean however that the effects of implementing planning policies in the East of England will no longer be monitored.
- 3.53 Local authorities in the East of England will continue to monitor their own plans in line with the statutory expectations placed on them, including those arising from the Strategic Environmental Assessment Directive and the requirements in the Planning and Compulsory Purchase Act 2004 to keep under review the matters which may be expected to affect the development of their area or the planning of its development. These matters include the principal physical, economic, social and environmental characteristics of the area and, in keeping them under review, local authorities can examine relevant matters in relation to any neighbouring area to the extent that they may be expected to affect their area.

Annex A

Regional Strategy policies and effects of revocation

This table sets out the themes and policies of the East of England Plan and the sustainability issues which they raise, including environmental issues identified in the sustainability appraisal and strategic environmental assessment of the strategy. The right-hand column provides a commentary on the key environmental issues arising in assessing the likely effects of revocation.

The commentary reflects the Government's view that the issues for sustainability identified in the assessment, where not removed by revocation of the Regional Strategy, can be mitigated by means other than through a regional strategy including through a combination of national planning policy, local authorities working collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and the protections provided for by national and European legislation. This assumption is applicable throughout the commentary and not repeated for every policy under consideration.

Plan policies	Sustainability Appraisal Issues	Revocation – Key Environmental Issues
<p>Section 3: Core Spatial Strategy</p> <p>(Provides the overall spatial policy framework for planning for sustainable development across the region.)</p>	<p>The original 2004 sustainability appraisal commented that the rate and intensity of economic and housing development which the region faces was intrinsically damaging to the environment and threatening to many aspects of quality of life. But it found that the majority of the Core Spatial Strategy policies seek to minimise the conflict between development and environment. And the strategy should help support the economies of existing centres and improve the correlation between jobs, housing and services – thus reducing need to travel, car reliance and improving access for all.</p>	<p>Revocation will remove the East of England regional approach and will put the weight on planning at the local level, informed by national policies and strategies. Local authorities have a legal obligation to contribute to the achievement of sustainable development. Strategic planning can be pursued through partnership working between authorities and other bodies, supported by the Government’s intention to introduce a duty to cooperate.</p>
<p>SS1 Achieving sustainable development</p>	<p>Positive or potentially positive impacts</p>	
<p>SS2 Overall spatial strategy</p>	<p>Positive impacts for previously developed land and air quality; otherwise not applicable.</p>	
<p>SS3 Key centres for development and change</p> <p>(Aims to contribute to the achievement of sustainable development and ensure the well-being (including where necessary, the regeneration) of their communities.)</p>	<p>Some positive impacts, including on air quality and local deprivation. The appropriate assessment of proposed changes found potential for effects on the integrity of some special area of conservation and special protection area sites. However, following further proposed changes, particularly to policy SS1 supporting text and to WAT2, it was</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>Where appropriate, partnership working and joint strategic planning documents can be pursued, backed by the proposed duty to cooperate.</p> <p>Moreover, new local plans will be subject to</p>

Plan policies	Sustainability Appraisal Issues	Revocation – Key Environmental Issues
	<p>concluded that these changes are sufficient to ensure SS3 will have no effect on the integrity of European Sites, except for the potential for ‘in combination’ effects with the South East Plan on the Ouse Washes Special Area of Conservation, Special Protection Area and Ramsar site and Portholme Special Area of Conservation, and potential effects of development in the Milton Keynes South Midlands Growth Area.</p>	<p>sustainability appraisal/strategic environmental assessment and, if necessary, appropriate assessment.</p>
<p>SS4 Towns other than key centres and rural areas</p>	<p>Positive on jobs, good design/built environment, access to services, affordable housing, reducing need to travel</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>SS4 placed the emphasis on local development documents defining the approach to development in these towns, in line with general (national) sustainability policies. Revocation should not have any effect on this approach.</p>
<p>SS5 Priority areas for regeneration</p>	<p>The appropriate assessment of proposed changes suggested there was potential for an effect on the integrity of the Breckland Special Area of Conservation/ Special Protection Area. But following changes to other policies at further proposed changes, the sustainability appraisal ‘Review’ was satisfied that SS5 will have no effect on the integrity of European Sites.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>See comments for SS3, which are also likely to apply to SS5.</p>

SS6 City and town centres		<p>This policy could be delivered by other means than through a regional strategy.</p> <p>SS6 placed the emphasis on local development documents, local transport plans and other strategies to provide for thriving and attractive city and town centres. Revocation should not have any effect on this approach. See also comments for SS3 and general comments above for the CSS.</p>
SS7 Green Belt	<p>Question over impacts of strategic review of Green Belt boundaries. Sustainability appraisal says that the Green Belt is an important contributor to overall environmental quality of more densely urban parts of the region and should be maintained.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>The revocation of top down housing targets will remove pressure to review Green Belt to accommodate growth. It is for local authorities to review their Green Belt boundaries, having regard to government's national policy on Green Belts. Current policy and the draft National Planning Policy Framework contain strong policies protecting the Green Belt from inappropriate development.</p>
SS8 The urban fringe		<p>This policy could be delivered by other means than through a regional strategy.</p> <p>SS8 places the emphasis on local authorities to work with other interests and through their local development documents, to enhance and plan for the appropriate use of urban fringe land, including working across</p>

		<p>administrative boundaries where appropriate. There is no reason why local authorities should not continue to deliver these benefits for their local communities and the environment, including partnership working to provide cross-boundary green infrastructure. Statutory requirements protecting designated wildlife sites will continue to apply.</p>
SS9 The coast	<p>The final Sustainability Statement notes that this policy provides stronger protection for biodiversity, and better integration of environmental and economic policy.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>Where relevant it will be for local authorities to plan for the coast, including regeneration of coastal towns and communities and the protection of coastal environmental assets. Local planning authorities should have regard to shoreline management plans. Statutory protection under the Habitats Directive and Regulations will continue to apply to coastal wildlife sites of European / international importance.</p>
Section 4: Economic Development	<p>The original 2004 sustainability appraisal commented on the regional spatial strategy's spatial policy support for the regional economic strategy - its emphasis on economic development as a means of improving quality of life, on regeneration, and on the environment as a source of benefits and opportunities which economic development should safeguard, enhance and benefit from, are good for strategic environmental assessment</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>See general comments above for the CSS and policy SS3.</p> <p>These policies set out the vision for delivering a more successful and competitive regional economy. This could be delivered by other means than through a regional strategy. Delivery of the Plan policy objectives would</p>

	objectives. However, the sustainability appraisal also noted that setting high targets for employment growth was likely to score badly against a range of environmental and social criteria, and this needed to be addressed in more detail by policies and supporting text.	be highly dependent on implementation of this policy through local development frameworks.
E1 Job growth	Positive on jobs and local regeneration	<p>The Government's economic white paper (published in October 2010) sets out its vision for local growth, shifting power away from central government to local communities, citizens and independent providers. This means recognising that where drivers of growth are local, decisions should be made locally.</p> <p>The <i>Plan for Growth document</i> (included in the Budget 2011) confirms the Government's commitment to ensuring that the planning system supports growth.. National planning policy requires local authorities to have regard and consider the contribution of the natural environment when setting out the economic vision and strategy for their areas.</p> <p>National planning policy addresses economic impact issues, including town centre hierarchies and sustainable patterns of economic growth and employment. These will continue to inform the preparation of local plans and the development management process. Local plans will continue to be subject to sustainability appraisal which will assess how sustainable development has been integrated into plans, and the impact of</p>
E2 Provision of land for employment		
E3 Strategic employment locations	The appropriate assessment of proposed changes concluded that the policy identifies a number of strategic employment locations where, in combination with specific sub-regional policies, development could result in adverse effects on European Sites. However, following changes to policy E2 at further proposed changes, the sustainability appraisal Review was satisfied that E3 will have no effect on the integrity of European Sites.	
E4 Clusters	Positive on jobs, addressing climate change, quality design, energy/'greenhouse' gas emissions	
E5 Regional structure of town centres	Positive or neutral impacts.	

		<p>policy options.</p> <p>The proposed duty to cooperate and local enterprise partnerships will play key roles in ensuring economic strategic priorities and infrastructure delivery is properly coordinated.</p> <p>Local authorities, business, and civic leaders, working together strategically through Local Enterprise Partnerships, are best placed to understand the needs of their area. The Government expects these Partnerships will drive sustainable economic growth and create the conditions for private sector job growth in their communities.</p> <p>Economic development is also strongly influenced by other central Government economic policies and strategies and wider influences, including market conditions and private sector investment decisions, which will continue to apply with or without the regional strategy.</p>
E6 Tourism	Positive effects, as policy recognises need to avoid adverse impacts on the natural and historic environments.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>Local planning authorities will continue to plan to support and develop (as appropriate) tourism, with particular attention to existing historic, cultural, landscape and other attractions, broadly as set out in policy E6, and informed by national planning policies.</p>

E7 The region's airports	Well rehearsed issues in regard to the environmental impacts of airport expansion.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>This policy reflects the approach to the region's main airports outlined in the 2003 Air Transport White Paper. Future development at and related to these airports will continue to be driven by evolving national aviation policy / strategy and National Policy Statements (and commercial operator's decisions), with or without the regional strategy. The relevant local authorities will decide what policies are appropriate to support the airports (e.g., housing for employees) informed by local needs and national policies on sustainable development. It seems unlikely that revocation of the regional policy will in itself have any significant environmental effects in regard to the future of airports in the East of England.</p>
Section 5: Housing	The original 2004 sustainability appraisal commented that the whole region was likely to experience considerable housing development, which would change the character of a number of locations. The policies seek to provide affordable housing, with the scale of the developments likely to lead to a number of social benefits such as provision of facilities and regeneration. But the policies were likely to have significant negative effects on the water resources of the East	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>This section sets out the regional housing provision targets for each local authority area (Policy H1).</p> <p>Local authorities are well placed to determine how to meet their ambitions for housing provision. It is for them to establish the appropriate level of housing provision in their area, taking into account evidence of need,</p>

	<p>of England, particularly in the southern areas; demand for construction materials and energy is likely to increase, as is traffic in the region, with likely negative impacts for the environment; and housing allocations could potentially have significant negative impacts on historic town centres in sub-regions such as Stansted/M11.</p>	<p>the availability of suitable land and other matters including the environment, in accordance with national policies.</p> <p>Alongside the Community Infrastructure Levy, the New Homes Bonus and the local retention of business rates are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth.</p>
<p>H1 Regional housing provision</p>	<p>Positive on support for new jobs, use of previously developed land, affordable housing, reducing need to travel. The appropriate assessment of proposed changes found potential for effects on the integrity of some special areas of conservation/special protection area sites. However, following changes to other sub-regional policies and policies H2 and WAT2 at further proposed changes, the sustainability appraisal review was satisfied that H1 will have no effect on the integrity of European Sites.</p> <p>The final Sustainability Statement also notes that this policy recognises the need to take account of water supply and waste water infrastructure requirements when bringing forward land for housing. (Housing targets for Dacorum and Welwyn/Hatfield were removed as a result of the July 2009 Court Order quashing Green Belt reviews and the major urban extensions which had been proposed.)</p>	<p>Moreover, new local plans will be subject to sustainability appraisal/strategic environmental assessment and, if necessary, appropriate assessment.</p>

H2 Affordable housing	Positive on affordable housing and reducing health inequalities	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>National policy on affordable housing still applies. It will be for local authorities to plan for the right mix of housing needed in their area, including affordable housing, having regard to national policy.</p>
H3 Provision for gypsies and travellers	<p>Policy H3 was replaced by new policies H3 & H4 in July 2009. These new policies require local authorities to make provision for additional pitches and plots for travellers. The revised Plan policies set out the distribution of over 1,200 additional residential pitches for traveller caravans and 184 additional plots for travelling showpeople that local authorities across the region were required to provide by 2011. The supporting text advised that sites should avoid areas at risk of flooding and adverse effects on areas of wildlife and landscape importance. However, consideration was to be given to the alteration of Green Belt boundaries, where necessary, to meet the required provision.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>The Government considers that local authorities are best placed to determine how to meet their housing needs – including the right level of site provision for travelling sites. Local authorities have a statutory duty to assess accommodation needs of travellers as part of their wider housing needs assessments. There is national planning policy for the provision of traveller sites. The Government has consulted on a new planning policy for traveller sites. Under this Local Authorities are expected to assess the needs for traveller sites and to use this to identify land in their development plan documents.</p>
Section 6: Culture	<p>The original 2004 sustainability appraisal found that the culture policies performed well against the leisure/culture and recreation criteria, particularly in relation to access and provision of facilities. But the</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>These policies broadly reflect relevant national planning policies and sustainable</p>

	policy did not have adequate provision to protect the natural resources in the East of England, particularly those that were already in an adverse condition such as sites of special scientific interest.	development principles. There is reference to local authorities taking account of the Regional Cultural Strategy (and any relevant local strategies). But the policy does not refer to specific (named) locations for cultural development and facilities.
C1 Cultural development		
C2 Provision and location of strategic cultural facilities		It is expected that local planning authorities will continue to pursue / produce policies on cultural development and facilities in accordance with sustainable development principles, and informed by national planning policies and other relevant strategies. Statutory protection will continue to apply where relevant, to sites of historic importance, or because of their recognised ecological or landscape value.
Section 7: Regional Transport Strategy	The original 2004 sustainability appraisal found that most of the regional transport strategy was very good for most sustainability criteria. Several of its core themes were cornerstones of sustainable transport planning, and have overwhelmingly positive appraisal scores. However, the intention to increase capacity for road traffic, including by building new infrastructure, would increase traffic and damage the environment directly by increasing fuel use, greenhouse gas emissions, pollution and noise. Extra roads would consume land and could damage landscape and	These policies could be delivered by other means than through a regional strategy. This section provides a suite of policies to support the aims / objectives of the regional transport strategy of increasing mobility and access, whilst minimising the impact on the environment and inhabitants of the East of England. Policy on and planning for strategic transport infrastructure (road, rail, airports, ports) is principally carried out at the national level and will be guided by National Policy Statements, with major transport schemes subject to

	biodiversity.	Environmental Impact Assessment, and so
(Policies T1 – T15)	<p>Positive on jobs, access to services, reducing need to travel/car reliance/road freight movements; reducing transport and 'greenhouse' gas emissions and improving air quality, promoting access to countryside and better health. Some doubts about whether policy T6, Strategic and Regional Road Networks, will encourage a growth in traffic.</p> <p>For policy T15, Transport Investment Priorities, the sustainability appraisal notes that the corridors and areas for further study have not been appraised, but any future schemes will need to go through the assessment and appraisal process. The sustainability appraisal review report confirms there should be no effect on the integrity of European sites from policy T15 alone. But there is potential for 'in combination' effect with the regional transport strategy on Breckland Special Area of Conservation and Special Protection Area, with regard to improvements to the A11</p> <p><i>The final Sustainability Statement also notes the inclusion in policy T1 of a new high level objective to manage travel behaviour and demand 'with the aim of reducing road traffic growth and ensuring the transport sector makes an appropriate contribution to the required reduction in</i></p>	<p>will be largely unaffected by revocation of the regional strategy. Below this level, the benefits of more sustainable transport provision and infrastructure can be delivered through local planning, which will be informed by national policy and local considerations.</p> <p>The Government expects local authorities to continue to work together on strategic planning issues that cross local authority boundaries, as and how they think appropriate. The Government intends that the proposed duty to co-operate to apply to local authorities and public bodies will support joint working and information sharing on cross boundary transport issues; and there will be support for authorities who want to work together more formally through the option of developing joint strategic planning policies with statutory status.</p> <p>With regard to air quality specifically, in areas of poor air quality - including those within, or adjacent to, an Air Quality Management Area - local authorities will need to work closely with relevant partners to ensure that development has taken proper account of relevant air quality matters.</p> <p>Relevant plans will be subject to sustainability appraisal/ strategic environmental</p>

	<i>green house gases’, and an outcome of ‘reduced greenhouse gas emissions’;</i>	assessment, and appropriate assessment.
Section 8: Environment	The original 2004 sustainability appraisal commented that the majority of the environmental policies in the draft performed very well against the sustainable objectives, particularly against the environmental criteria (although a lot of the chapter seemed to restate national policy rather than give specific regional application). However, some policies needed to be stronger, e.g., on water resources given the additional pressure that the scale and speed of delivery of new development would bring, and the effects of climate change. Rapid economic and housing growth threatened the achievement of the aims of many of these policies by increasing the pressures that the policies sought to reduce.	This section contains a suite of policies that reflect national policy on different aspects of the environment. They are largely generic in nature, but also refer to specific regional issues and locations, reflecting the Regional Environment Strategy (<i>Our Environment, Our Future, 2003</i>), and other relevant regional strategies.
ENV1 Green infrastructure	<p>Positive environmental impacts, including improving access to greenspace, reducing pressure on designated sites, promoting healthy lifestyle – though policy will require funding and actions from range of partners at all levels.</p> <p>The final Sustainability Statement also notes the elaboration of regionally significant green infrastructure and recognition of the multi-functional value of all forms of green space, and support for</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>Local authorities will need to have regard to national policy to support the delivery of sustainable development; and reflect the needs and wishes of their local communities. The Government’s June 2011 white paper, <i>The Natural Choice</i>, sets out proposals to support the development of green infrastructure, including the establishment of a Green Infrastructure Partnership.</p>

	<p>its provision 'so that, as part of a package of measures, it contributes to achieving carbon neutral development, flood attenuation and other wider policy objectives'.</p>	<p>Accordingly, local authorities may wish to continue to pursue this policy approach through their local development documents, working co-operatively with other authorities and bodies on cross-boundary networks.</p>
<p>ENV2 Landscape conservation</p>	<p>Policy has a positive impact.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>ENV2 reflects national policies on protecting important landscapes and landscape character.</p> <p>National planning policies provide for countryside protection, including protections for valued landscapes and nationally designated areas (which are also subject to statutory protection).</p> <p>In addition, the revocation of top down housing targets will remove pressure to review Green Belt to accommodate growth. The revocation of the plan could therefore potentially deliver associated environmental benefits including for landscape.</p> <p>It is for local authorities to review their Green Belt boundaries, have regard to government's national policy on Green Belts. Current policy in Planning Policy Guidance 2: Green Belts and the draft National Planning Policy Framework contain strong policies protecting the Green Belt from inappropriate development.</p>

		<p>Potential significant effects on landscapes should be identified by local authorities through the strategic environmental assessments of their local plans, environmental impact assessment and appropriate assessment of specific projects.</p>
<p>ENV3 Biodiversity and earth heritage</p>	<p>Should help to ensure protection and enhancement of biodiversity - though policy will require funding and actions from a range of partners at all levels. The final Sustainability Statement also notes the strengthening of protection for biodiversity and geodiversity, both on designated sites and elsewhere.</p>	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>Plan policy ENV3 generally reflects national policies on biodiversity and geodiversity, and refers to biodiversity action plan priorities and targets. Other policies also largely reflect national policies, including SS9 (the coast), ENV1 (green infrastructure) and ENV5 (woodlands).</p> <p>Local authorities are expected to continue to work together, and with communities, on conservation, restoration and enhancement of the natural environment – including biodiversity, geo-diversity and landscape interests. Authorities should continue to draw on available information, including data from partners, to address cross boundary issues such as the provision of green infrastructure and wildlife corridors.</p> <p>National planning policy on biodiversity, landscape and heritage will still apply. Local authorities can still develop local biodiversity action plans in cooperation with Natural</p>

		<p>England.</p> <p>Nationally and internationally designated sites will continue to be subject to statutory protection. Under the Habitats Regulations, where necessary, local authorities are required to undertake habitats regulation assessment of their local plans. Other than in exceptional circumstances they must not grant planning permission for a proposed development unless they have certainty that it will not, either individually or in combination with other plans or projects, adversely affect the integrity of the European site concerned.</p>
ENV4 Agriculture, land and soils	Policy has a positive impact.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>ENV4 includes policies that promote agri-environment schemes and the sustainable use of soil and water resources. They reflect relevant national policies but, to an extent, spatial planning policies are likely to be secondary to markets and agriculture and agri-environment support mechanisms, and decisions taken by farmers and other commercial interests.</p>
ENV5 Woodlands	Policy has a positive impact.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>ENV5 includes aspirational policies that promote new woodland and tree planting, and the protection of ancient woodland and</p>

		<p>veteran trees, which largely reflect national policies. Local authorities will need to have regard to relevant national policies and other factors outside of spatial planning influence tree planting and woodland creation (which generally do not require planning permission). The Government's White Paper, <i>The Natural Choice</i>, also recognises and supports the protection and improvement of woodland and forests.</p>
ENV6 Historic environment	Policy has a positive impact.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>ENV6 reflects national policies (though prior to their revision) on the protection and conservation of the historic environment, but also focuses on specific aspects that are especially significant in the East of England.</p> <p>The most important cultural heritage sites are subject to statutory protection. This is supported by national planning policy for the protection and conservation of the historic environment. Following the revocation of regional strategies, local authorities should continue to work together, and with communities, on conservation, restoration and enhancement of the heritage and historic environment.</p> <p>In planning for the historic environment, local authorities should still liaise with English</p>

		<p>Heritage to identify and evaluate areas, sites and buildings of local cultural and historic importance, and explore ways for the management, enhancement and regeneration of those areas.</p> <p>Local authorities should also continue to draw on available information, including data from partners, to address cross boundary issues.</p>
ENV7 Quality in the built environment	With other sustainable development strategies, this policy should help to ensure that new development contributes to the quality of the environment.	<p>This policy could be delivered by other means than through a regional strategy.</p> <p>ENV7 reflects national policy for local development documents to require new development to be of high quality. It also links design and regeneration with the historic environment. Local planning authorities should continue to have regard to national policy in planning for new, sustainable development which meets the needs of their local communities.</p>
Section 9: Carbon Dioxide Emissions & Renewable Energy [targets] (ENG1-2)	<p>Positive impacts on jobs, promoting energy efficiency and renewable energy, reducing carbon dioxide emissions and vulnerability to climate change.</p> <p>The final Sustainability Statement also notes the inclusion of a new policy (ENG1) for improving energy performance in development and reducing carbon emissions, and strengthening the 10% minimum renewable energy consumption</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>The policies seek to promote new development which optimises carbon emissions / energy consumption performance (ENG1); and sets out renewable energy targets for the region (ENG2).</p> <p>Local authorities are expected to have local plans in place which contribute to the move to</p>

	<p>requirement for new development included in the submission draft regional spatial strategy; and inclusion (in ENG2) of renewable energy generation targets, supported by indicative installed capacity values and related clarification.</p>	<p>a low carbon economy, cut greenhouse gas emissions, help secure more renewable and low carbon energy to meet national targets, and should have regard to national policy in preparing these plans. Local authorities may find it useful to draw on any relevant data held by regional or other bodies, including assessments of the potential for renewable and low carbon energy. The Government has already provided support to groupings of local authorities and their partners for the assessment of renewable energy potential in parts of the country. This evidence could help with planning for renewables at the local level. It is expected that local authorities and their partners will consider whether to maintain databases on renewable and low carbon energy on a strategic scale as part of their strategic planning function.</p>
		<p>Local authorities already work together on strategic issues that cross local authority boundaries. It is expected that they continue to do this after regional strategies are abolished, including in relation to evidence bases, and the proposed duty to cooperate will support this approach.</p>
<p>Section 10: Water (WAT1-4)</p>	<p>The emphasis on water efficiency and improved, integrated water resource management within the region is an important positive change. Improved</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>WAT1-3 are broad, aspirational policies</p>

	<p>efficiency and more effective management of consumption are also important and positive.</p> <p>Positive impacts, including on climate change vulnerability (including reducing flood risk), water resource management, helping to improve quality of rivers and ground-waters, protecting and enhancing aquatic wildlife habitats.</p> <p>The appropriate assessment of proposed changes found potential for effects on the integrity of several special area of conservation/special protection area sites. However, following changes to the text supporting policy WAT2 at further proposed changes, the sustainability appraisal review was satisfied that the policy will have no effect on European sites.</p> <p>The final Sustainability Statement also notes WAT1 includes targets for domestic water consumption reflecting the need for achieving improved resource efficiency in tandem with new development; and WAT2, a new policy setting out a co-ordinated approach to water infrastructure planning, including a requirement for water cycle studies, which takes proper account of environmental constraints.</p>	<p>promoting joint/partnership approaches to achieving improvement in water efficiency, water infrastructure and integrated water management.</p> <p>Joint/partnership working between the Environment Agency, water industry bodies, local authorities and others should continue with or without the regional strategy, in order to deliver water efficiency, management and infrastructure benefits. Any changes in housing numbers and related population & occupancy could be considered against the relevant water companies' Water Resources Management Plan to ensure it is able to supply the additional households. The Environment Agency's 'Comparison of Planning Scenarios' models could also be used in making assessments.</p> <p>Statutory requirements under the Water Framework Directive will continue to apply and be implemented principally in accordance with River Basin Management Plans. Local authorities should work co-operatively with other authorities, the Environment Agency and water companies to ensure the spatial planning aspects of River Basin Management Plans are applied. The proposed duty to cooperate will assist in this.</p> <p>WAT4 reflects national policy on development</p>
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		<p>and flood risk. Local authorities should continue to have regard to national policy on development and flood risk with or without revocation of the Plan. Lead Local Flood Authorities established under the Floods and Water Management Act 2010 should facilitate the local engagement needed to ensure that local planning decisions have due regard to flood risk. Local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' duties on flood risk management planning, and the complementary duty in the Floods and Water Management Act on bodies to cooperate. The Flood Risk Regulations 2009 impose a duty on the Environment Agency and lead local flood authorities to take steps to identify and prepare for significant flood risk.</p>
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<p>Section 11: Waste</p>	<p>The objectives (WM1) provide a more robust framework for cutting waste in the region and for moving it up the waste management hierarchy in line with Planning Policy Statement 10.</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>This section seeks to support and apply the regional waste management strategy, having regard to subsequent waste planning work, the Waste Strategy for England and national planning policy on waste. It includes the projected annual tonnages of waste (including waste imported from London) to be managed by the waste planning authorities in the region.</p> <p>The European Union Waste Framework Directive sets the overall statutory requirements. Revoking the regional strategy</p>
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(WM1-8)	<p>Positive impacts, including reducing reliance on landfill, reducing waste, increasing use of recycled material and reducing demand for raw construction materials</p>	<p>will not impact on these requirements. The focus for delivering spatial waste plans and implementing the directive lies at the local authority level. Waste planning authorities are expected to continue to take forward their waste plans to provide land for waste management facilities, to support the sustainable management of waste. Data and other information prepared by partners, including the Environment Agency and other waste planning authorities will continue to assist in this process.</p> <p>There is a need for a strategic approach and mechanism for maintaining an evidence base for waste management planning at a strategic spatial scale, including in respect of waste imported from London. However, 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. They should continue to work collaboratively, including on maintaining evidence bases, as appropriate, after regional strategies are abolished, and the proposed duty to cooperate to support this approach.</p>
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<p>Section 12: Minerals</p> <p>MI Land won aggregates and rock</p>	<p>Some potential positive impacts, including site restoration opportunities for green infrastructure and wildlife and biodiversity, and access to these facilities.</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>Policy M1 complements national minerals planning policy and seeks to ensure that local development documents identify and safeguard mineral resources, setting annual average supply figures for land-won aggregates and rock, with environmental safeguards.</p> <p>Mineral planning authorities should continue to plan for a steady and adequate supply of aggregate minerals to support economic growth. They should do this within the longstanding arrangements for minerals planning. Mineral planning authorities can choose to use alternative figures for their planning purposes if they have new or different information and a robust evidence base. Delivery of environmental benefits (biodiversity, recreation) should still be ensured through appropriate local plan policies on site restoration, following completion of extraction.</p>
<p>Section 13: Sub-Areas and Key Centres for Development and Change</p>	<p>The original 2004 sustainability appraisal found that while the sub-regional policies were likely to have a positive effect on many of the economic and social sustainability criteria, the scale and pace of change would inevitably have implications</p>	<p>These policies could be delivered by other means than through a regional strategy.</p> <p>The comments on section 3 (Core Spatial Strategy), and in particular on policy SS3, also apply to this section.</p>

	<p>for some aspects of sustainability. Strengths included: in general, directs development towards economically or socially deprived areas; predominantly brownfield development as a priority; and the policies in general placed strong emphasis on the importance of the natural environment. Against this, some growth was being targeted towards many areas in which natural habitats were already vulnerable or experiencing decline which was likely to further fragment habitats; infrastructure improvements (e.g. Thames Gateway) were likely to lead to further traffic; the historic built environment generally was likely to suffer; and some key concerns related to the vulnerability of the sub-regions to climate change, particularly with respect to flood risk and water availability.</p> <p>The sustainability appraisal report of the proposed changes regional spatial strategy concluded overall on this section that the proposed changes at sub-regional level did not provide sufficient detail at most locations for detailed appraisal to be carried out. In general, the changes did not appear to be significant at regional scale. Their implications at local level would need to be tested at local development document stage.</p>	<p>This section includes more specific policies on development and growth in four sub-regional areas and a number of other key centres (cities and towns) for change, in accordance with policies SS1-3. The regional strategy states that in some circumstances, more specific sub-area policies are required to resolve matters that cannot be left to the local level. However, the regional strategy also highlights the need for cooperation between local authorities and other agencies across administrative boundaries, and that joint or cooperative working on local development documents will often be required in delivering the sub-area policies.</p> <p>The regional strategy also notes that important sub-regional relationships and issues exist in parts of the region not covered by sub-regional policies. Local planning authorities and their partners are encouraged by the regional strategy to undertake joint or coordinated work on issues of mutual importance and to identify such issues in their local development documents and related strategies, despite the absence of specific regional strategy policies on these areas.</p>
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Cambridge sub-region	(Key sustainability issues identified for the sub-region addressed in the proposed changes. No other likely significant effects were identified by the appraisal of proposed changes)	See comments above in relation to section 13, which also apply to Cambridge sub-region policies.
(CSR1-4)		Policy CSR3 sought to protect the extent of the Green Belt around Cambridge in line with national planning policy and in recognition of the particular functions of this Green Belt, notably in regard to protecting the setting of the historic city. While the explanatory text indicated that the extent of the Green Belt may need to be revisited in the review of the RSS, this requirement imposed at Regional level will be removed by the revocation of the Plan. The actual boundaries of Green Belts are set at the local level. The local planning authorities will be able to set policies for the Cambridge Green Belt in their local development plans, in accordance with their communities' needs, and with regard to national policy and advice from bodies such as English Heritage.
Essex Thames Gateway	The [proposed changes] policy should assist in producing positive outcomes for each of the dimensions of sustainable development. It is not likely that there will be any significant impacts on the area.	See comments above applying generally to this section.
(ETG1-6)	A revised policy ETG2 (based exactly on the wording consulted upon at proposed changes stage) and supporting text was	

	published in January 2010. The revision concerned Thurrock Lakeside and includes policies promoting a high quality environment and protecting and enhancing green infrastructure, and securing more sustainable movement patterns.	
Haven Gateway	The policy clearly addresses the key sustainability issues identified for the sub-region, including deprivation, social exclusion and need for regeneration in some areas. No other likely significant effects were identified by the appraisal of proposed changes.	See comments above applying generally to this section.
(HG1-4)	The appropriate assessment of proposed changes found potential for effects on the integrity of the Stour and Orwell Estuaries Special Protection Area and Ramsar Site, as a result of 'in-combination' effects of these policies with port expansion. However, following changes to policies at further proposed changes, the sustainability appraisal review was satisfied that HG1 & 2 will have no effect on the integrity of European sites.	
London Arc	The policies in the proposed changes take account of the key sustainability issues identified for the sub-region, and the individual key centres for change within it. (Recognises high demand for housing, and model for growth based on urban expansion or extension will require	See comments above applying generally to this section, and also comments on SS7 (Green Belt).

	greenfield land).	
LA1 London Arc	Policy has a positive impact.	
LA2 Hemel Hempstead key centre for change	Positive impacts on employment and access to services shared benefits of prosperity. Negative impacts on greenhouse gas emissions (likely to increase from transport, construction) and waste arisings – though increases likely to be small in the context of existing levels.	Reference in the policy to the need for a review of the Green Belt at Hemel Hempstead has been removed following a High Court decision in July 2009. See comments above applying generally to this section.
LA3 Welwyn Garden City and Hatfield	Positive impacts on employment. Negative impacts on ‘greenhouse’ gas emissions and waste arisings – though increases likely to be small in context of existing levels. The appropriate assessment of proposed changes found potential for effects on the integrity of Lee Valley Special Protection Area and Ramsar Site through expansion of the Rye Meads sewage treatment works as a result of the proposed growth at Hatfield. However, following changes to policies at further proposed changes, the sustainability appraisal review was satisfied that policy LA3 will have no effect on the integrity of Lee Valley Special Protection Area/Ramsar site.	Reference to the need for Green Belt review at Welwyn/Hatfield has been removed following a High Court decision in July 2009. See comments above applying generally to this section. The issue of waste water infrastructure requirements and the expansion of the Rye Meads sewage treatment works, which is mentioned in the regional strategy supplementary text, have the potential to affect the environment, including potentially, the Lee Valley Special Protection Area and Ramsar site, depending on future levels of housing growth. But these issues are subject to local authority decisions and also water company business plans, and it is not possible for this exercise to predict the outcomes and likely impacts. See also comments on Policies WAT 1 - 3 concerning

		<p>requirements under the Water Framework Directive and river basin management plans.</p> <p>New or revised local plans will be subject to sustainability appraisal and strategic environmental assessment, and appropriate assessment under the Habitats Regulations.</p>
LA4 Watford	The policy appears to address the most significant sustainability issues facing the sub-region, including affordable housing.	See comments above applying generally to this section.
BSE1: Bury St Edmunds key centre	The appraisal has not identified any likely significant effects as a result of the proposed changes.	See comments above applying generally to this section.
CH1: Chelmsford key centre	The level of growth in the proposed changes over the Plan period is relatively modest and does not lead to any significant effects.	See comments above applying generally to this section.
GYL1: Great Yarmouth and Lowestoft key centres	Proposed changes document is clear that the need to address sustainability concerns (raised by sustainability appraisal of the draft regional spatial strategy) has been integrated into the strategy. No other likely significant effects have been identified.	<p>See comments above applying generally to this section.</p> <p>Without the Plan the local authorities will still need to work with the Environment Agency, water companies, developers and others to agree a local policy approach on new development and water treatment capacity, having regard to statutory requirements, including the Water Framework Directive, and national policy and advice.</p>
HA1: Harlow key centre	Positive impacts on employment and maintaining and enhancing existing natural assets. Expected negative impacts on 'greenhouse' gas emissions	<p>See comments above applying generally to this section.</p> <p>See also the comments against policy LA3 in</p>

	<p>(likely to increase from transport, construction) and waste arisings – though increases likely to be small in context of existing levels.</p> <p>The appropriate assessment of proposed changes found potential for effects on the integrity of Lee Valley Special Protection Area and Ramsar site through expansion of the Rye Meads sewage treatment works. However, following changes to policy HA1 and WAT2 and supporting text at further proposed changes, the sustainability appraisal review was satisfied that policy HA1 will have no effect on the integrity of this site.</p>	<p>relation to Rye Meads sewage treatment works.</p> <p>With or without revocation of the Plan, the local authorities will still need to work with the Environment Agency, water companies, developers and others to agree a local policy approach on new development and water treatment capacity, having regard to statutory requirements, including the Water Framework Directive, and national policy and advice.</p>
KL1: King's Lynn key centre	The appraisal has not identified any likely significant effects as a result of the proposed changes.	See comments above applying generally to this section.
NR1: Norwich key centre	The appraisal has not identified any other likely significant effects as a result of the proposed changes.	<p>The regional strategy notes that, in terms of numbers (new dwellings target of 33,000), the Norwich area is, with Cambridge, one of the two locations with the highest level of growth in the region.</p> <p>See comments above applying generally to this section.</p>
PB1: Peterborough key centre	The appraisal has not identified any likely significant effects as a result of the proposed changes.	See comments above applying generally to this section.
SV1: Stevenage key centre	Positive impacts on housing. Negative impacts on 'greenhouse' gas emissions	See comments above applying generally to this section. See also comments against

	<p>(likely to increase from transport, construction) and waste arisings – though increases likely to be small in context of existing levels. The Green Belt review will also need to address issues of impact on the surrounding landscape. The appraisal has not identified any likely significant effects as a result of the proposed changes.</p> <p>The appropriate assessment of proposed changes found potential for effects on the integrity of Lee Valley Special Protection Area and Ramsar Site through expansion of the Rye Meads sewage treatment works. However, following changes to policy SV1 and WAT2 and its supporting text at further proposed changes, the sustainability appraisal review was satisfied that policy SV1 will have no effect on the integrity of this site.</p>	<p>Policies LA3 and HA1, which also apply to SV1.</p>
<p>TH1: Thetford key centre</p>	<p>The proposed changes recognise the significance of the environmental assets in the area. The appraisal has not identified any likely significant effects as a result of the proposed changes.</p> <p>The appropriate assessment of proposed changes concluded there would be an effect on the integrity of the Breckland Special Area of Conservation/ Special Protection Area as a result of increased recreation pressure. Following changes</p>	<p>See comments above applying generally to this section.</p>

	to policy TH1 and its supporting text at further proposed changes, the sustainability appraisal review concluded that the policy will have no effect on the integrity of the Breckland sites.	
<p>Bedfordshire – Milton Keynes South Midlands Sub-Regional Strategy (MKSM) -</p> <p>Bedford & Luton Policy 1: Luton/Dunstable/Houghton Regis and Leighton Linlade</p> <p>Bedford & Luton Policies 2(a) and 2(b) Bedford and Marston Vale</p>	The sustainability appraisal of the draft MKSM policies was undertaken before appraisal of the main 2008 Plan, though appraisal of the latter covered generic issues affecting the region as a whole including Bedfordshire. The regional strategy notes that the provisions for Bedfordshire in policies H1 & E1 represent revisions to the sub-regional strategy.	See comments above applying generally to this section. See also comments in relation to policies H1 and E1. See also comments on Policy SS7, which applies to the review of the Green Belt at Luton required by MKSM Policy 2.
Section 14: Implementation and Delivery, Monitoring and Review		These policies set out the approach and mechanisms for implementing, monitoring and reviewing the regional strategy.
(IMP1-3)		See paragraphs 3.52 – 53. Revocation of the regional strategy would leave these policies redundant and would not have any significant environmental effects.

Annex B

Saved structure plan policies

County level structure plans were abolished under the Planning and Compulsory Purchase Act 2004, but the policies in them remained in force until the new regional spatial strategies were published. In 2007 the Government wrote to planning authorities to advise them which policies would be saved after 27 September 2007. Some of these policies remain in force as they have not been replaced by policies in either the regional spatial strategies or development plan documents. This annex lists such policies for the East of England and where they remain relevant the environmental implications of their revocation.

County structure plan / Saved policies	Policy has been implemented or expired	Generic policy	Applicable national policy in place	Superseded by local plan policy	Still relevant - environmental implications of revocation
Norfolk					
EC10: Change of use of hotels, holiday parks, chalets, camping/caravan sites. (Policy on when changes not acceptable).			X		
T2: Transport new development: Development to be assessed against its effect on traffic generation and alternative modes of access. Development not allowed if adequate access cannot be provided. Developers required to address the transport consequences and provide			X		

for access by public transport, cyclists, pedestrians and disabled people. Developer contributions sought (for infrastructure/public transport services/ access/ maintenance of additional highway works).					
T17: Transport general aviation: Permits development of small-scale business aviation or recreational flying at existing airfields, or the development of new airfields for such purposes, if no significant adverse impacts on the local environment and the amenity of local residents.			X		
RC8: Non-renewable energy: Circumstances where proposals for the development of conventionally fuelled power stations are acceptable.			X		
Suffolk					
CS11: Policy on residential development for the military air bases at Honington, Wattisham, Woodbridge, Mildenhall and Lakenheath			X	X	
ENV21: Development in the Broads: (Sets out the overall strategy for the Broads with which development proposals must be consistent to be acceptable).				X	
ECON7: Business clusters: (Supports the establishment and				X	

growth of business clusters (including protection of land allocations) subject to certain criteria).					
ECON11: Village community facilities: Circumstances where proposals for new community facilities will be encouraged. Development that would result in the complete loss of a particular type of community facility from a village not acceptable unless facility cannot be made viable.		X	X	X	
ECON14: Tourist accommodation: Development of tourist accommodation in the countryside (cabins, chalets, caravans, camp sites) acceptable where there is no material conflict with transport policies or environmental protection. But not in certain protected areas (Areas of Outstanding Natural Beauty, the Heritage Coast).			X	X	
T10: Cycle parking: Sufficient secure cycle parking to be provided in new developments to meet standards agreed by Suffolk local authorities.				X	
T12: County transport network: (Sets out the improvements to the county transport network that are expected to be implemented during the Plan period).				X	

T14: Major developments – travel/transport: (Requirements for transport impact assessment, ‘green’ travel plans, developers’ provision for public transport, cyclists and pedestrians and parking; and proposals generating a significant volume of trips). Developments involving movement of substantial volumes of bulk material expected to provide/have access to rail or waterborne handling facilities for most such traffic.			X		
T16: Civil aviation: (Requirements for proposals for civil aviation airfields/airports).				X	
REC4: New marinas, yacht harbours: Such developments acceptable within towns, particularly on existing derelict, redundant or under-used water frontages, where there is no material conflict with residential amenity or transport or environmental protection policies.				X	
MP2: Rail and port facilities for handling aggregates and cement: (Policy on safeguarding existing facilities).				X	
MP4: Mineral reserves: Permitted mineral reserves and potential resources protected as far				X	

as is reasonably practicable from development which might preclude their later extraction.					
MP8: Mineral working for major civil engineering or transport projects: (Criteria for the favourable consideration of proposals for mineral working and associated development solely to serve such projects).					
Bedfordshire & Luton					
7: Areas of Great Landscape Value				X	
22: Defence sites and institutions				X	
25: Infrastructure – County Council				X	
49: Other airfields				X	
69: Luton Town Football Club				X	
Essex & Southend-on-Sea					
N3: Extension of Suffolk Coast/Heaths Area of Outstanding Natural Beauty			X	X	
CC1: Undeveloped coast - protection belt				X	
BIW9: Airport development			X	X	
LRT6: Coastal water recreation				X	
EG1: Proposals for new power stations			X	X	
MIN4: Sterilisation and safeguarding of mineral sites				X	
Hertfordshire					
3: Comprehensive settlement appraisals				X	
15: Key employment sites				X	

24: Environmental traffic zones				X	
35: County transport schemes				X	
52: Safeguarding of mineral resources				X	
Cambridgeshire & Peterborough					
P2/3: Strategic employment locations				X	
P2/5: Distribution, warehousing and manufacturing				X	
P4/4: Water-based recreation				X	
P6/1: Development related provision				X	
P7/10: Location of new sand and gravel workings				X	
P8/10: Transport investment priorities				X	
P9/2b: Review of Green Belt boundaries				X	
P9/2c: Location and phasing of development land to be released from the Green Belt				X	
P9/5: Economic regeneration of Chatteris				X	
P9/8: Infrastructure provision				X	
P9/9: Greater Cambridge sub-region transport strategy				X	
P10/3: Market towns – Peterborough and North Cambridgeshire				X	
P10/5: Peterborough - Hampton				X	

Annex C

East of England: Local plans (as at August 2011)

The following lists the development plan documents (including mineral and waste development plan documents) and saved local plan policies, which would form the relevant development plan for the areas in question in the East of England, if the regional strategy and saved structure plan policies were revoked.

Planning Authority	Current status (composition) of the local development framework (including where saved policies from earlier local plans remain in place, pending approval of the core strategy)	Other relevant (saved) policies and other near complete development plan documents
Babergh	(Local plan saved policies)	
Basildon	(Local plan saved policies)	
Bedfordshire & Luton	(Minerals and Waste Local Plan saved policies)	
Bedford Borough Council	Core Strategy and Rural Issues; Town Centre Area Action Plan	Local plan saved policies
Braintree	(Local plan saved policies)	<i>{Draft core strategy - found 'sound'}</i>
Breckland	Core Strategy and Development Control Policies Development Plan Document	Local plan saved policies
Brentwood	(Local plan saved policies)	
Broadland	Joint Core Strategy (Greater Norwich) with Norwich City, South Norfolk	Local plan saved policies
The Broads Authority	Core Strategy	Local plan saved policies
Broxbourne	(Local plan saved policies)	<i>[Draft core strategy - examination in public]</i>

Cambridge City	(Local plan saved policies); Cambridge East Area Action Plan and North West Cambridge Area Action Plan (Both Joint with South Cambs)	
Cambridgeshire & Peterborough	(Aggregates (Minerals) and Waste Local Plans saved policies)	{ <i>Minerals and Waste Core Strategy - examination in public - found 'sound'</i> }
Castle Point	(Local plan saved policies)	
Central Bedfordshire	Core Strategy and Development Management Policies, and Site Allocations Development Plan Documents - North Area (former Mid-Beds)	Local plan saved policies (South Bedfordshire and Mid-Bedfordshire)
Chelmsford	Core Strategy and Development Control Policies Development Plan Document; Town Centre Area Action Plan	Local plan saved policies
Colchester	Core Strategy, Development Policies and Site Allocations Development Plan Documents	
Dacorum	(Local plan saved policies)	
East Cambridgeshire	Core Strategy (including Development Control Policies)	Local plan saved policies
East Hertfordshire	(Local plan saved policies)	
Epping Forest	(Local plan saved policies)	
Essex County Council	(Minerals and Waste Local Plans saved policies)	
Fenland	(Local plan saved policies)	
Forest Heath	Core Strategy (<i>part of which has been subject to a successful Judicial Review</i>)	Local plan saved policies
Great Yarmouth	(Local plan saved policies)	
Harlow	(Local plan saved policies)	
Hertfordshire County Council	(Minerals and Waste Local Plans saved policies)	
Hertsmere	(Local plan saved policies)	
Huntingdonshire District Council	Core Strategy; Huntingdon West Area Action Plan	Local plan saved policies

Ipswich	(Local plan saved policies)	
King's Lynn and West Norfolk	Core Strategy	Local plan saved policies
Luton	(Local plan saved policies)	
Maldon	(Local plan saved policies)	
Mid Suffolk	Core Strategy	Local plan saved policies
Norfolk County Council	(Minerals and Waste Local Plans saved policies)	<i>{Draft minerals and waste core strategy and development management policies - examination in public}</i>
North Hertfordshire	(Local plan saved policies)	
North Norfolk	Core Strategy (including development control policies), Site Allocations Development Plan Document	
Norwich	Joint Core Strategy (Greater Norwich) - with Broadland and South Norfolk; Northern City Centre Area Action Plan	Local plan saved policies
Peterborough	Core Strategy	Local plan saved policies
Rochford	(Local plan saved policies)	<i>{Draft core strategy - examination in public}</i>
South Cambridgeshire	Core Strategy, Site Specific Policies and Development Control Policies Development Plan Documents; Cambridge Southern Fringe Area Action Plan, Northstowe Area Action Plan, Cambridge East Area Action Plan, North West Cambridge Area Action Plan	Local plan saved policies
South Norfolk	Joint Core Strategy (Greater Norwich) - with Norwich and Broadland	Local plan saved policies
Southend-On-Sea	Core Strategy	Local plan saved policies
St Albans	(Local plan saved policies)	
St Edmundsbury	Core Strategy	Local plan saved policies
Stevenage	(Local plan saved policies)	

Suffolk County Council	Waste Core Strategy, Minerals Core Strategy and Minerals Specific Site Allocation Development Plan Documents	
Suffolk Coastal	(Local plan saved policies) <i>[Draft] Core Strategy (adopted by the Council as interim planning policy)</i>	
Tendring	(Local plan saved policies)	
Three Rivers	(Local plan saved policies)	
Thurock UA	(Local plan saved policies)	
Uttlesford	(Local plan saved policies)	
Waveney	Core Strategy, Development Management Policies and Site Specific Allocations Development Plan Documents	Local plan saved policies
Welwyn Hatfield	(Local plan saved policies)	