

Strategic Environmental Assessment of the Revocation of the Yorkshire and Humber Regional Strategy

Environmental Report



AMEC Environment & Infrastructure UK Limited

September 2012

This Environmental Report is a consultation document on the likely significant environmental effects of revocation of the Yorkshire and Humber Plan and the Regional Economic Strategy (which together form the Regional Strategy in force for the Yorkshire and Humber).

Responses on any aspect of the report are invited by 26 November 2012.

This report succeeds the previous environmental report for the revocation of the Yorkshire and Humber Regional Strategy which was consulted on between October 2011 and January 2012. It is a stand alone document, the intention of which is to provide the reader with an up-to-date comprehensive assessment of the environmental effects of the revocation of the Yorkshire and Humber Plan and the Regional Economic Strategy without the need to refer back to the previous environmental report. Any reader who has also read the previous environmental report should note that, insofar as there is any difference between the two documents, this Environmental Report is to be preferred.

A summary of responses to this consultation will be published on the DCLG website in due course. 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:

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Non Technical Summary

This **Non-Technical Summary** presents the findings of the **Strategic Environmental Assessment (SEA) of the plan to revoke the Regional Strategy for Yorkshire and the Humber** contained in the accompanying Environmental Report. The assessment, Environmental Report and Non-Technical Summary have been completed by AMEC E&I UK Ltd on behalf of DCLG.

The following sections:

- explain what the plan is and its implications for the Yorkshire and Humber region by revoking the Regional Strategy for Yorkshire and the Humber;
- provide a summary of the environment within the region;
- outline the likely significant environmental effects of the plan, along with the reasonable alternatives;
- propose mitigating measures for likely significant environmental effects identified;
- propose monitoring measures; and,
- provide an indication of the next steps.

The plan to revoke regional strategies

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*”. The objective was to make Local Plans, and where desired neighbourhood plans, the basis for local planning decisions.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies, and gave the Secretary of State powers to revoke in full or in part the existing strategies by order.

The Government’s proposal is to replace the eight regional strategies outside London with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth.

Regional Strategy for Yorkshire and the Humber

The Regional Strategy for Yorkshire and the Humber combines the contents of the **Regional Spatial Strategy for Yorkshire and the Humber** and the **Yorkshire and Humber Regional Economic Strategy**.

The Regional Spatial Strategy (RSS) for Yorkshire and the Humber (published as the Yorkshire and Humber Plan in 2008) was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the region for 15 to 20 years. In particular, it has sought to put in place a development strategy with the potential to support continued sustainable growth up to, and beyond, 2026 whilst reducing the region's impact on, and exposure to, the effects of climate change and protecting and enhancing its green infrastructure. It includes policies for environmental protection, the economy, housing, and transport, as well as sub-area policies.

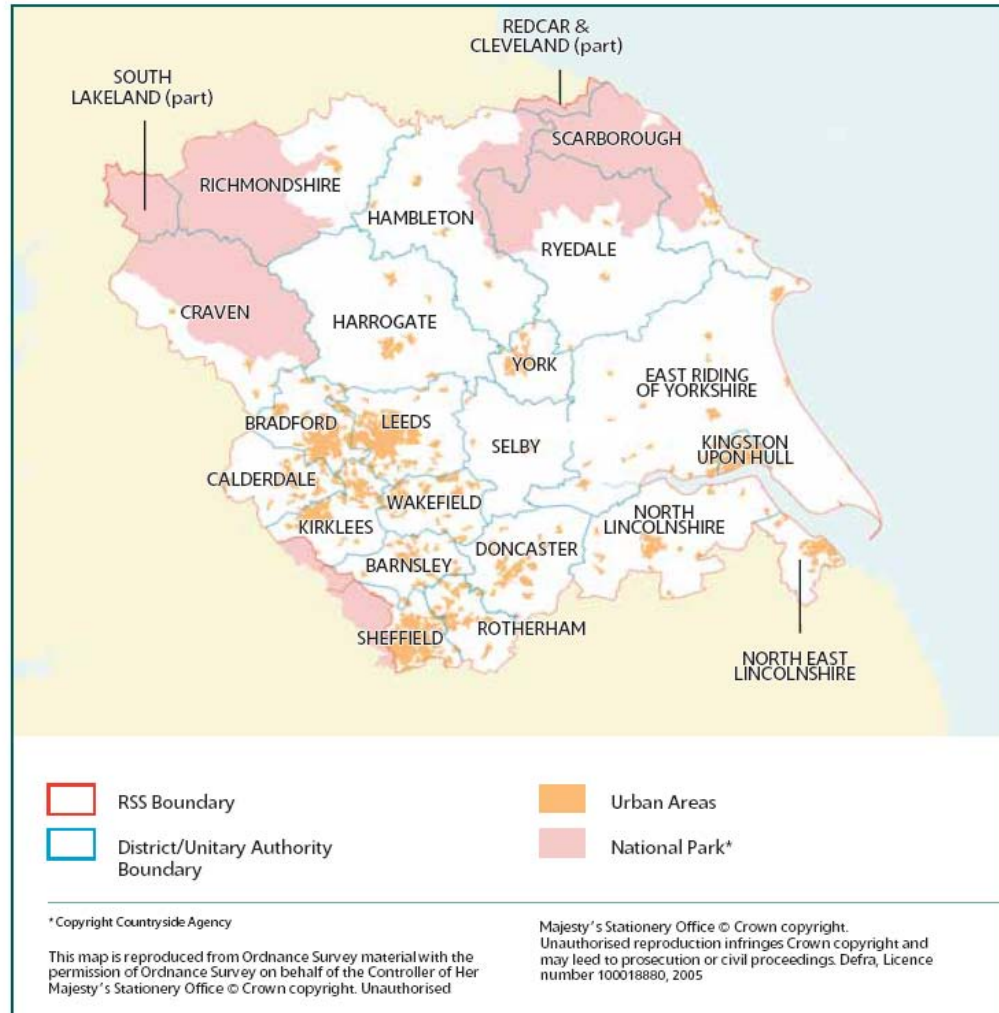
The key ambition of the Yorkshire and Humber Plan is to promote sustainable development and an increased focus on needs and opportunities; its aims to:

- respond to market forces;
- match need with opportunity; and
- manage the environment as a key resource.

The Yorkshire and Humber Plan sets out the need for selective reviews of Green Belt boundaries to meet development needs (a strategic review of the West Yorkshire Green Belt) and protect cultural heritage (a need to define the inner Green Belt boundary at York). It also requires local planning authorities to provide at least 22,260 net additional dwellings over the period 2008 to 2026.

Figure NTS 1 The area covered by the Yorkshire and Humber Plan

Figure 1.2: Planning Authorities covered by the Yorkshire and Humber plan



Source: *Yorkshire and Humber Plan 2008*

The Yorkshire and Humber Plan contains:

- a spatial vision and core approach with generic policies that provide a framework for sustainable development in the region, and that complement national planning policy statements;
- policies on environmental protection, the economy, housing and transport; and
- more location-specific policies on a number of sub-areas for development and change.

In total there are six policy areas. Further details of the individual policies are set out in **Appendix A**.

The **Yorkshire and Humber Regional Economic Strategy (RES)** was produced in compliance with the Section 7 of the Regional Development Act 1998. It was developed with regional partners and was subject to formal consultation and an SEA.

The RES provides the vision for the Yorkshire and Humber economy 'to be a great place to live, work and do business, that fully benefits from a prosperous and sustainable economy' and covers the period up to 2016. Three cross-cutting themes (sustainable development, diversity and leadership and ambition) underpin the RES and its headline goals that cover:

- More business.
- Competitive business.
- Skilled people.
- Good jobs.
- Transport, infrastructure and the environment.
- Stronger cities, towns and rural areas.

The Yorkshire and Humber RES complements the Yorkshire and Humber Plan. Locational priorities in the RES are in-line with RSS policies and the RSS is framed to support sustainable economic growth as set out the RES. Both:

- Use the same evidence base sharing a foundation in economic forecasts based on the Yorkshire Futures econometric model.
- Recognise and plan around the same geographic areas to address needs and realise opportunities across the whole of the region including cities and city regions as key regional drivers, towns, market towns, more remote rural areas, and coastal areas.
- Join up housing and economic development in the same priority locations and promote housing renovation, replacement rates and design standards to meet the needs of the future including policies to ensure development and investment benefits communities, especially in disadvantaged areas.
- Place stress on development and investment in cities and major towns with an emphasis on good accessibility by public transport in order to maximise accessibility for people and address congestion and environmental impact.

- Make the renaissance of cities and towns a key priority with an emphasis on integrating development and investment and avoiding any development that would undermine renaissance priorities.
- Recognise and address the issues facing rural areas with policies to support market towns and more remote rural areas, adopting an approach that reflects key opportunities and needs, and which is of a scale appropriate to each settlement.
- Foster the growth and expansion of businesses, stress the importance of business development particularly in priority clusters, sectors and locations that need to regenerate their economies, and emphasise the importance of key economic assets to the region's economy including the key role of universities and other higher education institutions.
- Adopt clear transport policies that place emphasis on priorities and schemes that bring economic benefit as well as other social and environmental benefits in line with the principles of good access, minimising congestion and sustainable development.
- Include proposals to promote environmental quality in the region. This includes promotion of renewable energy, effective flood risk management, the enhancement of environmental assets, a focus on quality of place, high standards of design, green infrastructure, energy efficiency in new developments, and resource efficiency in business.

The relationship between the RES and the Yorkshire and Humber Plan is set out in more detail in **Appendix H**.

Strategic Environmental Assessment (SEA) of the plan to revoke the Regional Strategy for Yorkshire and the Humber

SEA became a statutory requirement following the adoption of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The objective of SEA, as defined in Directive 2001/42/EC is: *'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 plans and programmes with a view to contributing to sustainable development'*.

As part of its stated commitment to protecting the environment, the Government decided to carry out an assessment of the likely significant environmental effects of the revocation of the 8 regional strategies, on a voluntary basis. A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012. There were 103 responses to the consultation process.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework (NPPF) and a planning policy on Travellers sites, has commenced provisions in the Localism Act and introduced a duty to co-operate in the Localism Act which contains

strong measures for local co-operation.¹ In addition, in a judgment² by the Court of Justice of the European Union (CJEU), the Court held that *..in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment*⁴. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent CJEU case law, to update and build on the assessments which were described in the previous Environmental Reports. This assessment is the result in relation to the revocation of the Regional Strategy for Yorkshire and the Humber - it is a stand-alone document and there is no requirement to refer back to the previous report on the revocation of the Yorkshire and Humber Regional Strategy published on 20th October 2011.

The Yorkshire and Humber environment

To provide the context for the assessment, the SEA Directive requires that the relevant aspects of the current state of the environment and its evolution without the plan are considered, along with the environmental characteristics likely to be significantly affected. This information is presented in detail for each SEA Topic considered in this assessment in **Appendix E**. Table NTS 1 provides a brief summary.

Table NTS 1 Summary of State of the Environment in Yorkshire and the Humber

SEA Topic	Summary of the Environment and Key Characteristics in Yorkshire and the Humber
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)	<p>Yorkshire and the Humber hosts 21 Special Areas of Conservation, 8 Special Protection Areas and 3 Ramsar sites as listed in Appendix G. These sites are subject to the highest level of protection.</p> <p>There are 385 Sites of Special Scientific Interest (SSSIs) which cover 11% of the region's land area. The condition of SSSIs in the region has improved significantly over the last decade with 97.7% per cent being in favourable or unfavourable but recovering condition in 2012. However, 0.55% of SSSIs are still in unfavourable and declining condition with 0.01% destroyed.</p> <p>Biodiversity interest in Yorkshire and the Humber includes upland moorland and heath, limestone habitats, lowland hay meadows, lowland raised bog, chalk grassland and over 23,600ha of ancient woodland.</p> <p>Biodiversity associated with urban green spaces (private gardens, riverbanks, road verges, allotments and public parks) are important to the region. They represent the main contact with nature for the majority of people, but also provide valuable stepping stones for habitats and species as part of wider ecological networks.</p>
Population (including socio-economic effects and accessibility)	<p>In 2010 the resident population of the Yorkshire and Humber region was 5,301,252. Over two thirds of people live in West or South Yorkshire and many are concentrated in the cities of Leeds, Sheffield and Bradford. Each area has its own issues, opportunities and concentrations of people of different racial backgrounds.</p> <p>The number of net additional dwellings per annum rose from the 2004-05 level to 20,270 in 2007-08. However as the economy entered recession in 2008, the number of net additions in the region fell from the 2007-8 level to 11,040 in 2010-11, with approximately 86% of these from private enterprise.</p>

¹ S110 of the Localism Act 2011 Duty to co-operate in relation to planning for sustainable development

² The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*

SEA Topic	Summary of the Environment and Key Characteristics in Yorkshire and the Humber
	<p>Yorkshire and Humber's economy has undergone major restructuring over the past two decades. Traditional industries such as coal, steel, textiles, fishing and agriculture have seen a decline. New areas of competitive advantage are emerging, including advanced manufacturing, low-carbon technologies and financial and business services.</p> <p>The region has an above-average proportion of residents (aged 16 to 64 and working) employed in routine occupations requiring a low level of skills or qualifications, 13 per cent in 2011 compared with 11 per cent in the UK. By contrast, occupations which require the highest qualifications are under-represented, at 38 per cent of all employed residents compared with 43 per cent in the UK.</p>
Human Health	<p>In Yorkshire and Humber, male life expectancy at birth is 77.7 years and female life expectancy is 81.8 years. For both males and females these figures are slightly lower than the nationwide average of 78.2 years and 82.3 years respectively.</p> <p>More than a fifth of adults (23 per cent of men and 22 per cent of women) in Yorkshire and Humber smoked cigarettes in 2009, one of the highest two rates in Great Britain</p> <p>In 2010/11 Yorkshire and Humber had the second highest number of crimes recorded per 100,000 population of any region in England. It had the highest rates of burglary of all the regions in England, at 1,315 incidences per 100,000 population compared with the English average of 961.</p> <p>Yorkshire and Humber contains 17% of the very highest Index of Multiple Deprivation rank (1% most deprived areas), the second highest rate of all the regions, as well as 18% of the 5% most deprived, 17% of the 10% most deprived and 14% of the 20% most deprived. The largest concentrations of deprived areas in the region are within the urban areas of Hull, Bradford, Doncaster, Sheffield and Barnsley.</p>
Soil and Geology (including land use, important geological sites, and the contamination of soils)	<p>Around nine per cent of the land in Yorkshire and Humber is urban development.</p> <p>Agriculture has long since been a dominant land use in Yorkshire and the Humber. Livestock farming predominates in upland areas and arable farming in lowland areas. About 10 per cent of the region is covered by excellent or very good quality agricultural land and 37 per cent by good or moderate quality agricultural land.</p> <p>There is a legacy of contaminated land from past industrial activities. The region has 2,734 historic landfill sites some of which have caused land contamination with hazardous materials and chemicals.</p>
Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	<p>There are 4,000 kilometres of rivers in the Yorkshire and Humber region and the Humber catchment is the largest in England including the catchment of the rivers Ouse, Aire, Calder and Don.</p> <p>The Humber River Basin District is one of the most diverse in England, ranging from the upland areas of the Peak District, South Pennines and the North York Moors, across the Derbyshire and Yorkshire Dales and the fertile river valleys of the Trent and Ouse, to the free-draining chalk of the Wolds. In 2009 only 18% of surface waters were classified as good or better ecological status/potential.</p> <p>The Yorkshire and Humber region has the North Sea along its eastern margin running from Whitby in the north down to the Humber estuary in the south of the region. The region's coast includes a number of internationally important biodiversity sites. In 2009, 21 bathing waters were monitored and there were no failures.</p> <p>In 2009 60% of the groundwater bodies were of a good or better quantitative status, with 54% at a good chemical status. The primary reason for poor quantitative status is that abstraction levels – mainly for drinking water – exceed the rate at which aquifers recharge. The Sherwood Sandstone aquifer is heavily used for drinking water supplies with the Environment Agency preventing further abstractions where the environment is at risk of deterioration.</p>
Air Quality	<p>15 local authorities in Yorkshire and Humber have designated Air Quality Management Areas predominantly situated around motorways and A roads.</p> <p>Between 1999 and 2009 the flow of traffic on the region's roads and motorways increased by</p>

SEA Topic	Summary of the Environment and Key Characteristics in Yorkshire and the Humber
	8.4 per cent.
Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	<p>In 2009, the Yorkshire and Humber net emissions of carbon dioxide (by end user) were estimated to be 43 million tonnes, giving an estimate of 8.2 tonnes of carbon dioxide emissions per capita. This compares to emissions of 53 million tonnes in 2005, giving an estimate of 10.4 tonnes of carbon dioxide emissions per capita.</p> <p>Some 15 per cent of land is at risk of flooding with 6.7 per cent being at significant risk, much of this being in low-lying areas around the Humber estuary. In total 385,000 properties are at risk from flooding from rivers and the sea and over 65,000 properties are at significant risk.</p>
Material Assets (Waste Management and Minerals)	<p>Yorkshire and Humber produces around 16 million tonnes of waste a year. The amount landfilled has reduced and the amount recycled and recovered has increased from 7.3 per cent in 2000/01 to 33.8 per cent in 2008/09. In 2009/10 this figure improved again, with local authorities in the region recycling 37 per cent of household waste during that period.</p> <p>There are over 100 sites producing primary aggregate in Yorkshire and Humber region. In 2008 total sales of primary aggregate minerals in the region were 3.8 million tonnes of land-won sand and gravel, and 10.3 million tonnes of crushed rock, these figures have been steadily reducing from 2003.</p>
Cultural Heritage (including architectural and archaeological heritage)	<p>Yorkshire and the Humber's heritage includes World Heritage Sites at Fountains Abbey and Studley Royal near Ripon and Saltaire Village near Bradford. It has 2,624 scheduled monuments and over 31,000 listed buildings including important castles and abbeys, historic country houses, medieval buildings, and the City of York with two thousand years of dense and complex settlement.</p> <p>In 2011, 4.2 per cent of high grade (grade I and II*) listed buildings were at risk, a decrease from 7.1 per cent in 1999. Since 2006, the number of scheduled monuments at risk has been reduced from 880 to 701. However, with 21 per cent of monuments at risk, the region still has the highest proportion of monuments at risk of any region in the country.</p>
Landscape and Townscape	<p>Yorkshire and Humber includes several landscapes of national importance including the North York Moors National Park, the Yorkshire Dales National Park, and the Peak District National Park, as well as all or part of five Areas of Outstanding Natural Beauty, including the Howardian Hills, North Pennines, Nidderdale, and parts of Forest of Bowland and of Lincolnshire Wolds.</p> <p>There are over 90,000 hectares of woodland, covering some 5.8% of the land area, but below the average of other parts of England.</p> <p>The coastline includes areas of great heritage value (over half is designated as Heritage Coast) but also some of the fastest eroding coastlines in North West Europe.</p>

A more detailed description of issues and existing environmental problems that relate to sites designated under the Habitats Directive (92/43/EEC) and the Birds Directive (79/409/EC) is set out in **Appendix G**.

The evolution of the environmental baseline without the plan to revoke the Regional Strategy for Yorkshire and the Humber would include changes anticipated to arise from retaining it. To provide an informed understanding of this, the assessment has used the findings of the 2008 Sustainability Appraisal of the Yorkshire and Humber Plan. Key changes noted include:

- Improvements in the functional ecological networks of the region's core biodiversity sites through a more integrated network of habitats including an increase in woodland area from 6% to 6.5% of total land area.

- Between 2008 and 2033, the population of Yorkshire and Humber is expected to increase from 5,217,500 to 6,296,000 and the annual average net additions to the dwelling stock 2008-2026 for the region will be 22,260.
- Housing growth along with the limited availability of brownfield resource in some local authorities will necessitate the release of greenfield sites for development.
- From 2008 to 2033, an increase of 348,460 households would, at current levels of resource use per household, lead to an increase in carbon dioxide emissions of 8.7 million tonnes per year; increased use of 714 billion kWh of gas per year; and increased use of 166 billion kWh of electricity per year with associated emissions.
- Changes in our climate, such as reduced summer rainfall, will mean water resources will have to be managed carefully in order to avoid shortages of water in the summer months and damage to river and wetland ecology as a result of low flows in rivers.
- Changes in our climate, such as more severe storms and wetter winters, will increase the risk of flooding and loss of inter-tidal habitats in the Humber Estuary.

Appendix E contains more detailed information on the evolution of the baseline.

The relationship of the plan to revoke the Regional Strategy for Yorkshire and the Humber with other policies, plans and programmes

Consistent with the SEA Directive requirements, this assessment has identified and reviewed other relevant policies, plans and programmes at an international (European), national, regional and local level. The review has identified how these other policies, plans and programmes could influence the plan to revoke the Regional Strategy. It also identifies how the plan to revoke could contribute to the achievement of any environmental or sustainability objectives set out in these other policies, plans and programmes. Of particular relevance is the National Planning Policy Framework, as well as the 26 Local Plans/Core Strategies and 5 plans that contain mineral and waste policies in the region. The relevant Local Plans/Core Strategies and Mineral and Waste Plans are presented in **Appendix C**.

The relevant environmental protection objectives are reviewed and provided in **Appendix E**. Examples include:

- protection and enhancement of the levels and variety of biodiversity, including designated sites, priority species and habitats;
- protection and enhancement of soil quality and landscape character;
- protection and enhancement of water supplies and resources; and

- promoting the efficient use of water.

The review also helped to inform the development of the baseline, aid the determination of the key issues and provide the policy context for the assessment.

Which environmental topics has the plan to revoke the Regional Strategy for Yorkshire and the Humber been assessed against?

The plan to revoke the Regional Strategy has been assessed against the 12 topic areas, identified below. These include all of the topics set out in the SEA Directive. The methodology used within the assessment is in **Section 3** of the Environmental Report.

1. Biodiversity	8. Air quality
2. Fauna	9. Climatic factors including climate change and adaptation and flood risk
3. Flora	10. Material assets including waste management and minerals
4. Population including demographics, socio-economics	11. Cultural heritage including architectural and archaeological heritage
5. Human health	12. Landscape
6. Soil including geology and land use	
7. Water quality and resources including surface and ground water quality and availability	

The baseline data and information required under the SEA Directive for each of these topics is presented in **Appendix E** to the Environmental Report.

What reasonable alternatives were identified and assessed?

Consideration of the reasonable alternatives for a proposed policy or plan is a fundamental aspect of policy and planning development and a pre-requisite for the preferred direction to gain wider and long term support. In turn, recording the reasons for the selection of the preferred option can also aid subsequent review, particularly if the assumptions that underpin any alternatives change over time.

Article 5(1) of the SEA Directive requires the identification, description and evaluation of reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme. On this basis, the starting point for identifying alternatives to the revocation of the Regional Strategy for Yorkshire and the Humber has been the scope of the powers of the Secretary of State to revoke, partially revoke or fully revoke the regional strategies. Responses to the consultation suggested a number of other alternatives (see **Appendix F** and Section 2.4 of the main report) including partial revocation.

Following the application of the reasonableness test in compliance with Article 5(1) of the SEA Directive, the following alternatives have been taken forward for assessment within the SEA:

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

Under either revocation or retention local authorities will need to prepare and implement their Local Plans and other planning policy documents and to take planning decisions having due regard to the NPPF. The importance placed on the retained Regional Strategy and the NPPF may change over time, particularly when the Regional Strategy is not revised and so becomes out of date and less relevant to local community circumstances. Revocation of the Regional Strategy also has the potential to affect Local Plans and planning decisions more immediately as in some cases, removing the Regional Strategy will remove a regional policy that the local planning authority used to make local development decisions and local policy. The implications and effects on relevant Local Plan policies have therefore also been considered in the assessment.

What are the likely significant effects³ of the plan to revoke the Regional Strategy for Yorkshire and the Humber and the reasonable alternatives?

The assessment of the revocation of the Regional Strategy for Yorkshire and the Humber has shown that **significant positive effects similar to those if the Regional Strategy were retained will occur in the long term** on all elements of the environment.

³ This includes consideration of the effects in the short, medium and long term permanent and temporary and positive and negative effects. Secondary, cumulative and synergistic effects are also specifically considered in Table NTS3.

The assessment has also shown that negative effects similar to those if the Regional Strategy were retained will occur in the short-long term in respect of impacts on all elements of the environment due to the quantum of housing and employment development and the expansion of freight and airport facilities in the region. However, the effects will be minimised as far as possible through the application of policies in the NPPF and other statutory duties which seek to ensure development is designed and located to minimise its environmental impact.

For the majority of policies, **it is difficult to identify clear differences between the effects of retention and revocation.** This reflects the broad strategic nature of the Regional Strategy policies and the degree to which responsibilities are already devolved to local authorities to reflect the principles in their Local Plans. It also reflects the provisions of the NPPF which mean that the basic framework for the delivery of sustainable development is in place and which are also compatible with the sustainable development principles employed in the Regional Strategy for Yorkshire and the Humber. In terms of the differences, although revocation could increase the number of additional homes delivered and thus the magnitude of environmental impact, **a locally led approach could ensure that in the long term, development planning in respect of housing and employment allocations could take account of a more detailed understanding of local environmental capacity issues** and possibly allow a more diverse and locally-specific spatial distribution. This locally-led approach could ensure that negative effects from the quantum of housing and employment development are more effectively mitigated.

In the case of revocation, it is AMEC's view that there may be more uncertainty about impacts in the short and medium term due to the transition period for those local authorities where plans are out of date or who need to establish arrangements under the duty to co-operate to deliver strategic policies and then reflect them in their adopted Local Plans. The application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.

One particular area where a short-medium term difference arises is in relation to cultural heritage and revocation of the policies related the York Green Belt. The Yorkshire and Humber Plan contained a specific action to define the boundaries of the York Green Belt to safeguard the special character and historic value of the city from the level of development proposed. In the short-medium term, revocation effectively removes the statutory basis for the York Green Belt, its general extent and purpose to prevent harm to the historic character. Given general policies in the NPPF to protect heritage assets, an individual development is unlikely to have a significant negative effect; however, the longer the period between revocation and the adoption of local plans which are consistent with national green belt policy, the greater the opportunity for the cumulative effects of the development on the Green Belt to have a significant negative effect on the special character and setting of York.

Many of the benefits of retention relate to spatial planning issues that cross local authority boundaries (e.g. green infrastructure) and require direction and co-operation from a number of stakeholders including local authorities to be realised. Therefore, in the case of revocation there is more uncertainty about benefits coming forward in the short to medium term where local authorities need to establish arrangements under the "duty to co-operate" to deliver such strategic policies and then reflect those

arrangements in their adopted Local Plans. So whilst **the duty to co-operate could well address a wide range of strategic issues**, such as the delivery of green infrastructure, it is AMEC’s opinion that **there is uncertainty as to how this might work, particularly in the short to medium term, both by topic and geographically**. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.

The plan to revoke the regional strategies is national in scope as well as applying to the eight regions. In consequence the national implications and effects of the Yorkshire and Humber Regional Strategy have also been considered in the assessment. In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.

The following table presents a summary of the environmental effects of revocation, retention and partial retention of each of the six policy areas contained in the Regional Strategy for Yorkshire and the Humber. It includes consideration of the short, medium and long term permanent and temporary, positive and negative effects. These cover a broad range of policy issues and encompass those objectives contained in the Regional Economic Strategy, namely: more business, competitive business, skilled people, good jobs, transport, infrastructure and the environment, stronger cities, towns and rural areas.

It should be noted that the effects of the recent Government housing and planning package changes have not been considered in detail in this assessment as policy detail is still being developed; however, it may prove that the increased emphasis on growth and development given by these proposals addresses some of the effects on the short and medium term arising from the uncertainties in those 15 authorities without Local Plans in conformity with the Regional Strategy.

NTS 2 Summary of the Effects of Revocation, Retention and Partial Revocation by Topic

Yorkshire and Humber Plan Policy Area	Revocation	Retention	Partial Revocation		
			Revoke quantified and spatially-specific policies ⁴	Revoke non quantitative and non-spatially specific policies	Policies with significant negative effects

⁴ The sub-area policies and policies that provide a quantum of development (e.g ENV4, ENV5, ENV6, ENV13, H1, H4, H6, E1 and E3)

Yorkshire and Humber Plan Policy Area	Revocation	Retention	Partial Revocation		
			Revoke quantified and spatially-specific policies ⁴	Revoke non quantitative and non-spatially specific policies	Policies with significant negative effects
Spatial Vision and Core Approach (YH1-YH9)	<p>Revocation of the plan will not remove the need for housing and economic development in the region.</p> <p>Effects will be dependent on the manner in which local authorities apply the requirements of the NPPF to their local context, however, as the NPPF expects them to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate significant positive effects on population, health, soil, water, air, climatic factors and material assets will result.</p> <p>There may be a delay in realising the benefits in the short and medium term due to the time required to put in place up to date Local Plans and implement the duty to co-operate; however, Local Economic Partnerships have already been established across the region to support economic growth with headline aims reflecting the locational aspects of the spatial vision and core approach.</p> <p>Potentially significant negative effect on the special character and setting of York in the short-medium term due to revocation of the action to define the boundaries of the York Green Belt.</p>	<p>In the short-medium term potentially significant negative effects would be avoided.</p> <p>In the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.</p>	Same effects as retention. ⁵	Same effects as revocation.	<p>Policy YH9 Part C only in respect of defining the York Green Belt</p> <p>In the short-medium term potentially significant negative effects would be avoided on the special character and setting of York.</p>

⁵ Since the spatial vision and core approach contains no quantum of development all policies would be retained.

Yorkshire and Humber Plan Policy Area	Revocation	Retention	Partial Revocation		
			Revoke quantified and spatially-specific policies ⁴	Revoke non quantitative and non-spatially specific policies	Policies with significant negative effects
Sub-Area Policies (LCR1&2, SY1, HE1, Y1, VTL1, C1, RR1)	<p>Revocation of the plan will not remove the need for housing and economic development in the region.</p> <p>Effects will be dependent on the manner in which local authorities apply the requirements of the NPPF to their local context, however, as the NPPF expects local authorities to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate significant positive effects on population, health, water, climatic factors and material assets will result.</p> <p>There may be a delay in realising the benefits in the short and medium term due to the time required to put in place up to date Local Plans and implement the duty to co-operate; however, Local Economic Partnerships have already been established across the region to support economic growth with headline aims reflecting the locational aspects of the spatial vision and core approach.</p> <p>Potentially significant negative effect on the special character and setting of York in the short-medium term due to revocation of the action to define the boundaries of the York Green Belt.</p>	<p>In the short-medium term potentially significant negative effects would be avoided.</p> <p>In the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.</p>	Same effects as revocation. ⁶	Same effects as retention.	<p>Policy Y1 Parts C1, C2 and Key Diagram only in respect of defining the York Green Belt</p> <p>In the short-medium term potentially significant negative effects would be avoided on the special character and setting of York.</p>
Environment (ENV1-ENV14)	<p>Revocation of the plan will not remove the need for local authorities to comply with NPPF policies and statutory duties in relation to environmental legislation, for example, removal of specific protection for the Sherwood Sandstone aquifer will be mitigated by the fact that abstraction from the aquifer will be governed by River Basin Management Planning and groundwater abstraction licences to manage any over-abstraction.</p> <p>There may be a delay in realising environmental benefits in the short to medium term due to the time required to put in place up to date Local Plans and implement the duty to co-operate; however since the NPPF includes a concise but strong policy that requires local planning</p>	<p>In the short-medium term positive effects in relation to green infrastructure are likely to be more pronounced as there will be no delay in implementation.</p> <p>Specific reference to protection of the Sherwood Sandstone aquifer, the protection of undesignated cultural heritage and landscape assets, and a desire to</p>	<p>In the short term positive effects in relation to green infrastructure are likely to be more pronounced as there will be no delay in implementation.</p> <p>Specific reference to protection of the Sherwood Sandstone aquifer, and the protection of undesignated cultural heritage and landscape assets increases</p>	Retaining the policy on renewable energy and the regional woodland target along with the minerals apportionment and waste management policy increases the positive effects of partial-retention.	None

⁶ Since although no quantum of development is specified all policies are spatially-specific to the sub-area in question.

Yorkshire and Humber Plan Policy Area	Revocation	Retention	Partial Revocation		
			Revoke quantified and spatially-specific policies ⁴	Revoke non quantitative and non-spatially specific policies	Policies with significant negative effects
	authorities to plan positively for the creation, protection, enhancement and management of networks of green infrastructure significant positive effects in terms of biodiversity and landscape are likely to occur long-term.	reduce minerals extraction in designated areas increases the positive effects of retention. Retaining the policy on renewable energy and the regional woodland target along with the minerals apportionment and waste management policy increases the positive effects of retention.	the positive effects of partial-retention.		
Economy (E1-E7)	Effects will be dependent on the manner in which local authorities apply the requirements of the NPPF to their local context, however, as the NPPF expects them to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate it is anticipated that significant positive effects on population will result in the long term. There may be a delay in realising the benefits in the short to medium term due to the time required to put in place up to date Local Plans and implement the duty to co-operate; however, Local Economic Partnerships have already been established across the region to support economic growth. Negative effects on the environment will occur in the short to long term (a similar effect to retention) due to the quantum of employment development, the use of greenfield land, natural resources and waste generation. Statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.	In the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.	In the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.	Same effects as revocation.	None
Housing (H1 – H6)	In making Local Plans local authorities must consider the delivery of the homes needed in the area. However, it will be for local authorities to establish the right level of housing provision (including affordable housing and provision for gypsies and travellers) for their area in relation to an assessment of needs thus having a	Higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the population. By	Higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the	There may be a delay in realising benefits in the short to medium term due to the time required to put in place up to date Local Plans and implement the	None

Yorkshire and Humber Plan Policy Area	Revocation	Retention	Partial Revocation		
			Revoke quantified and spatially-specific policies ⁴	Revoke non quantitative and non-spatially specific policies	Policies with significant negative effects
	<p>significant positive effect on population and health.</p> <p>There may be a delay in realising benefits in the short to medium term due to the time required to put in place up to date Local Plans and implement the duty to co-operate since the overarching policy direction, particularly in relation to transforming older industrialised parts of South Yorkshire, West Yorkshire and the Humber, will be lost.</p> <p>Negative effects on the environment will occur in the short to long term (a similar effect to retention) due to the quantum of housing development, the use of greenfield land, natural resources and waste generation. Statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.</p>	<p>setting out the overarching direction within which Local Plans should be developed retention would have significant benefits in the short-medium term. However, in the long term to 2026 (due to existing shortfalls) retention could result in an uncertain effect.</p>	<p>population, partial revocation would allow the right level of housing provision whilst retaining the benefits of policies relating to addressing social inequalities and economic disparities in the older industrialised parts of South Yorkshire, West Yorkshire and the Humber.</p>	<p>duty to co-operate since the overarching policy direction, particularly in relation to transforming older industrialised parts of South Yorkshire, West Yorkshire and the Humber, will be lost.</p> <p>Higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the population to 2026 (due to existing shortfalls) therefore partial retention could result in an uncertain effect.</p>	
Transport (T1-T9)	<p>The NPPF requires local authorities to plan for sustainable transport, combined with the duty to co-operate this will facilitate work to promote public transport and ensure a close and mutually consistent relationship between spatial and local transport plans, to deliver appropriate sustainable transport needs and have a significant positive effect on air and climatic factors through reduced emissions from car-based transport.</p> <p>Expansion of airports, freight facilities, ports and other strategic transport infrastructure development could have a negative effect. Negative effects associated with strategic transport infrastructure development may be avoided if local authorities decide not to take these forward on revocation. Statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.</p>	<p>In the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.</p>	<p>Same effects as retention.⁷</p>	<p>Same effects as revocation.</p>	<p>None</p>

⁷ Since the Regional Transport Strategy contains no quantum of development all policies would be retained.

What are the secondary, cumulative and synergistic effects of the plan to revoke the Regional Strategy for Yorkshire and the Humber?

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to (amongst others) the secondary, cumulative, synergistic effects on the environment. The following table summarises the secondary, cumulative and synergistic effects by assessment topic.

Table NTS 3 Summary of Secondary, Cumulative and Synergistic Effects

Assessment Topic	Summary Cumulative Effects
<p>Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)</p>	<p>Yorkshire and Humber's biodiversity resource could be adversely impacted by direct or secondary effects from housing development, particularly in relation to loss of Green Belt, and transport. Revocation will not affect the maintenance of favourable condition status as existing legislation protecting SAC, SPA, SSSI and protected species remains in place, strengthened by the commitments in the NPPF in relation to protecting biodiversity resources. It is therefore expected that revocation of the Regional Strategy would not change the positive direction of travel. The achievement of legally binding targets for water and air quality will also be significant contributory factors (due to secondary and synergistic effects) in improving the quality of areas important for wildlife while enhanced provisions on aspects such as the delivery and protection of green infrastructure will play an important role in increasing the overall biodiversity value. There may be gradual change to biodiversity resources over time due to factors, such as, climate change and coastal erosion. However, in the long term, revocation is likely to have a positive cumulative effect due to the protection and enhancement of green infrastructure across the region.</p>
<p>Population (including socio-economic effects and accessibility)</p>	<p>Revocation of the Yorkshire and Humber Plan will not affect the realisation of significant secondary and cumulative positive effects associated with the delivery of economic development, housing development and transport infrastructure in the region on local communities in the long term. The 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 green infrastructure etc. Inter-regional cooperation will continue in respect of regeneration and renewal resulting in secondary and cumulative benefits on population.</p>
<p>Human Health</p>	<p>Revocation will still enable secondary positive benefits on health to be delivered as local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine and deliver the socio-economic needs of their area (e.g. employment and housing quality) and protect and enhance green infrastructure. New homes are to be in locations accessible by sustainable means of transport, walking and cycling in particular are healthy activities and the NPPF is complementary to national initiatives such as the cycle to work scheme all of which will result in positive secondary effects on health.</p>
<p>Soil and Geology (including land use, important geological sites, and the contamination of soils)</p>	<p>Cumulative effects are likely to be negative (under both retention and revocation) due to the ongoing demand for development land associated with housing development, particularly affecting greenfield land in West</p>

Assessment Topic	Summary Cumulative Effects
	Yorkshire and the Leeds-Bradford corridor.
Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	Revocation is not considered to affect the need to sustainably manage water resources and improve water quality as the need will remain. Water resource management will be delivered by other policy and legislation, by a range of organisations, in order to avoid negative secondary, cumulative and synergistic effects on water resources and in relation to biodiversity sites. Thus, although housing and employment development (under retention or revocation) will increase pressure on water resources (compounded by the effects of climate change), the cumulative effect is considered to be neutral.
Air Quality	Revocation is not considered to affect the need to achieve good air quality levels across the region. Air quality management will be delivered by other policy and legislation, by a range of organisations, in order to avoid negative secondary and cumulative effects. Thus, although employment and housing development will increase the magnitude of secondary effects on air quality by virtue of increasing the amount of traffic generated (under retention or revocation), the cumulative effect is considered to be neutral as it will not alter current trends.
Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	Yorkshire and the Humber could be substantially affected by the effects of climate change (see biodiversity and water topics in particular). Revocation will not affect the direction of movement towards a low carbon economy as it will be delivered by other climate change policy and legislation, but as development will increase the magnitude of secondary environmental impacts on the climate by increasing the amount of traffic generated (under retention or revocation) associated with economic and housing development the cumulative effect of revocation on climate change is considered to be neutral.
Waste Management and Minerals	The main adverse secondary impacts on material assets are a result of development increasing demand for minerals resources and increasing the amount of waste generated. Cumulative effects are likely to be negative due to the ongoing demand for resources and waste generated under both retention and revocation. However, ensuring timely provision of appropriate waste management facilities will have significant secondary benefits on human health.
Cultural Heritage (including architectural and archaeological heritage)	Direct or secondary effects (in relation to the setting of heritage assets) could result from development under either retention or revocation. However, revocation will not affect the protection given to designated heritage assets as existing legislation protecting World Heritage Sites, listed buildings, scheduled monuments, conservation areas and registered parks and gardens remains in place, strengthened by the NPPF's commitments. Therefore, long term, revocation is likely to have a positive cumulative effect.
Landscape and Townscape	Revocation will not affect the protection given to Yorkshire and Humber's designated landscapes as existing legislation protecting National Parks and AONBs remains in place, strengthened by the NPPF's commitments. There may be gradual change to landscapes over time due to factors, such as, climate change, change in agricultural practices and economic conditions. However, long term, revocation is likely to have a positive cumulative impact due to the protection and enhancement of green infrastructure across the region.

Proposed mitigation measures

A number of mitigation measures have been identified in the detailed assessment in **Appendix D**.

Mitigation of the effects will be diverse and may need to be topic or sub-regionally specific. For example, in planning for water provision as part of new development, there may be greater reliance on Water Resource Management Plans, greater involvement of the Environment Agency at a local level and heightened co-operation between interested parties. Similarly, for issues such as biodiversity, continued co-operation and resources would be required to achieve similar commitments in relation to protecting and enhancing green infrastructure to that intended under the Yorkshire and Humber Plan.

Monitoring proposals

It is a requirement of the SEA Directive to establish how the significant effects of revoking the regional strategies will be monitored. As set out in ODPM Guidance⁸, *“it is not necessary to monitor everything or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.”*

CLG’s Business Plan⁹ under Section 5 ‘Put Communities in charge of planning’ includes specific monitoring actions for the department regarding the Local Plan making progress by local authorities and on compliance with the duty to co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised Local Plans. When reviewing the environmental effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the metrics and sources of information contained in Table NTS 4. Any resulting analysis of long term trends will be used to consider whether any further mitigation or intervention is needed for:

- The significant effects identified in the assessment that may give rise to irreversible damage where it is appropriate to implement relevant mitigating measures before such damage is caused; and
- Uncertain effects where monitoring would enable preventative or mitigating measures to be undertaken.

Taking this into account, of the 12 topics considered in this SEA, it is proposed that monitoring should focus on the following:

⁸ ODPM, September 2005: *Practical Guide to the Strategic Environmental Assessment Directive*

⁹ CLG May 2012, Business Plan 2012-2015

Table NTS 4 Proposed Monitoring Indicators and Sources of Information

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Condition of designated sites • Threatened habitats and species • Populations of countryside birds • Surface water biological indicators 	JNCC report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats Joint Nature Conservation Committee http://www.jncc.gov.uk/page-4241 http://jncc.defra.gov.uk/page-4239 http://jncc.defra.gov.uk/page-4238 http://jncc.defra.gov.uk/page-4235 http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF Defra http://www.defra.gov.uk/statistics/environment/inland-water/ The Environment Agency are responsible for monitoring water quality under the Water Framework Directive
Population	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Employment Information • Population • Housing and additional net dwellings 	Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region
Human Health	Annual (where information allows) trends in: <ul style="list-style-type: none"> • National Statistics – long term illness, etc. • Crime • Deprivation • Access to and quality of the local environment 	Office of National Statistics on health Home Office, Crime Survey for England and Wales Department for Communities and Local Government statistics: Indices of Deprivation ONS (proposed measures of wellbeing)
Soil and Geology	Annual (where information allows) trends in:	

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> Land use 	Department for Communities and Local Government statistics
Water	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> % of catchments with good ecological status Water resource availability Per capita water consumption 	<p>Environment Agency & Defra http://www.defra.gov.uk/statistics/environment/inland-water/ Yorkshire Water Yorkshire Water</p>
Air	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Number of AQMAs Number of AQMAs were exceedances occurred 	Defra
Climatic factors	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Emission of greenhouse gases Number of properties at risk of flooding 	<p>DECC Statistical Release: Local and regional CO₂ emissions EA</p>
Material Assets	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Volume of construction waste and proportions recycled Volume of hazardous waste Volume of controlled wastes and proportions recycled Volume of minerals extracted 	<p>EA EA EA Yorkshire and Humber Mineral Planning Authorities</p>
Cultural heritage, including architectural and archaeological heritage	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> % of heritage assets of different types that are at risk 	English Heritage 'Heritage at risk report'
Landscape and Townscape	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Change in AONBs (area, threats and quality) 	National Association of AONBs

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> • Changes in Conservation Areas • Percentage who are very or fairly satisfied with local area • Trend in number of vacant dwellings 	<p>English Heritage (if 2003 survey repeated)</p> <p>ONS (proposed measures of wellbeing)</p> <p>DCLG</p> <p>http://www.communities.gov.uk/documents/housing/xls/1815794.xls</p>

What were the challenges faced in completing this report?

A number of technical difficulties were incurred in carrying out the assessment. These reflect a number of factors, principally that undertaking an assessment of the effects of revocation is a new requirement and that there are some uncertainties over future effects. The environmental effects of revoking the Regional Strategy will clearly be dependent on future decisions by local authorities, individually and collectively. The uncertainty arising from local decisions has been reflected as appropriate in the assessment of the individual policies in **Appendix D** and in the consideration in the topic chapters contained in **Appendix E**.

The next steps

This Environmental Report will be presented for consultation until Monday, 26 November 2012. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the regional strategies.

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1. Introduction

1.1 The Plan to Revoke Regional Strategies

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*”. The objective was to make Local Plans, and where desired neighbourhood plans, the basis for local planning decisions.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies. It gave the Secretary of State powers to revoke in full, or in part, the existing strategies by order.

The Government’s proposal is to replace the eight regional strategies (comprising the relevant Regional Spatial Strategies and Regional Economic Strategies) outside London with a more localist planning system. Together with incentives such as the New Homes Bonus it aims to encourage local authorities and communities to realise their aspirations for housing and economic growth.

1.2 Strategic Environmental Assessment (SEA)

SEA became a statutory requirement following the adoption of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. This was transposed into UK legislation on the 20 July 2004 as Statutory Instrument No.1633 - The Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633). The objective of SEA, as defined in Directive 2001/42/EC is:

‘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 plans and programmes with a view to contributing to sustainable development’.

Throughout the course of the development of a plan or programme, the SEA should seek to identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and to propose measures to avoid, manage or mitigate any significant adverse effects and to enhance any beneficial effects.

1.2.1 Applying SEA to the Revocation of the Regional Strategies

Regional strategies are plans for the purpose of the European Directive 2001/42/EC 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 assessment. 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 2005.

As part of its stated commitment to protecting the environment, the Government decided to carry out an environmental assessment of the revocation of the existing regional strategies, on a voluntary basis. These assessments were prepared to be compliant with the procedure set out in the Strategic Environmental Directive. A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the start of the consultation on the assessments there have been a number of developments that are relevant to assessing the likely significant environmental effects of the proposal to revoke the regional strategies. These are:

- the **National Planning Policy Framework (NPPF)** was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment;
- the **planning policy for Traveller sites** was published in March 2012 (to be read in conjunction with the NPPF);
- the provisions which create a **new duty to co-operate** were commenced when the Localism Act received Royal Assent on 15 November 2011. They require Local Planning Authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.

Additionally, the Court of Justice of the European Union (CJEU) gave judgment in March 2012 on the applicability of the SEA Directive to a procedure for the total or partial revocation of a land use plan.¹⁰ It held that such a procedure in principle falls within the scope of the Directive and is subject to the rules relating to the assessment of effects on the environment as laid down by the Directive.

The public consultation on the Environmental Reports generated many helpful and informative responses. Some of these provided additional information and suggested other analysis to help improve the assessments. The Government has therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and CJEU jurisprudence, to update and build on the earlier assessments. Details of this additional analysis are given in **Section 3.1**. This Environmental Report reflects this decision and, in line with the requirements of the SEA Directive, is subject to consultation. As this is further to the consultation in 2011/2012 on the environmental assessments, the Government considers it reasonable for the consultation period for this subsequent consultation to run for eight weeks.

¹⁰ The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*

The assessment in this Environmental Report can be considered to stand alone and has been intentionally written to provide sufficient information for consultees to consider whether the likely significant environmental effects have been identified of the plan to revoke the Regional Strategy for Yorkshire and the Humber (and reasonable alternatives) without recourse to the previous Environmental Report. Any reader who has also read the previous environmental report should note that, insofar as there is any difference between the two documents, this Environmental Report is to be preferred.

All responses to this consultation will be given careful consideration alongside those received in response to the earlier consultation. The Government would particularly welcome responses on:

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

1.3 Purpose of this Report

The purpose of this Environmental Report is to:

- present relevant environmental baseline information, including a review of plans and programmes;
- identify, describe and assess the likely significant environmental effects associated with the plan to revoke the regional strategies and reasonable alternatives;
- propose measures to avoid, reduce and/or offset any potentially significant adverse effects and, where appropriate, to enhance any potential positive effects from the plan to revoke the regional strategies;
- outline and describe the measures envisaged for monitoring any significant effects identified by the Environmental Report; and
- demonstrate that the plan to revoke the regional strategies has been developed in a manner consistent with the requirements of the SEA Regulations.

1.4 Habitats Directive Assessment

The Habitats 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 interest.

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.

Where a competent authority other than the Secretary of State proposes to agree to a plan or project despite a negative assessment of the implications for a European site, they must notify the Secretary of State and they must not approve the plan or project. The Secretary of State may give directions to the competent authority in any such case prohibiting them from agreeing to the plan or project, either indefinitely or for a specified period (Regulation 62).

Given these safeguards, the Government's view is that the revocation of the regional strategies will therefore have no effects requiring assessment under the Habitats Directive.

1.5 Consultation and Stakeholder Engagement

1.5.1 Overview

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

Detailed responses to the environmental reports published in October 2011 were provided by consultees, and in the intervening period several key pieces of planning policy and legislation have been put in place. The Government has therefore decided to further consult on the environmental reports to allow the developments in policy and legislation, as well as the comments from respondents to be taken into account in the assessment of the likely significant environmental impacts of revocation of the regional strategies.

1.5.2 Scoping Consultation

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

They were consulted on the method proposed to assess the likely significant environmental effects of revoking the regional strategies which was to take as a starting point the environmental assessment components of the sustainability appraisals carried out when the regional strategies were being

prepared. For those regions which had not completed an up-to-date Regional Spatial Strategy, use was also made of the more recent appraisals of the emerging strategy. The assessments followed the format set out in Annex I of the SEA Directive, assessing impacts taking into account that Local Plans would set the framework for decisions on planning applications following the proposed revocation of the regional strategies and saved structure plan policies.

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 was 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 focused on those aspects of the plan to revoke the regional strategies which might be expected to lead to significant environmental effects.

The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. English Heritage focussed their comments on the implications for heritage of the proposed revocation. Scottish Natural Heritage considered that the implications for strategic planning for green infrastructure and the interface with the marine environment should be considered. In addition, since this is the first time an environmental assessment had been undertaken for the revocation (rather than the creation) of a plan, a draft of the previous environmental report was also sent to the statutory consultation bodies for their comments. Their comments on the previous draft reports are presented in summary in **Appendix F**, together with a response.

1.5.3 Public Consultation on the previous Environmental Reports

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

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the environmental reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government SEA Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). Seven responses dealt specifically with the environmental report for Yorkshire and the Humber - only one response was received from a local planning authority (Hull City Council) within the Yorkshire and the Humber region. A further 72 dealt solely with environmental reports for regions other than Yorkshire and the Humber. A summary of the 31

consultation responses relevant to the Yorkshire and Humber environmental report is set out at **Appendix F**.

The main issues raised by respondents on the previous environmental reports, which were relevant to Yorkshire and the Humber, are grouped into six broad themes as follows:

- The Overall Approach to SEA.
- Assessment.
- Reliance on the NPPF.
- Policy change.
- Reliance on the Duty to Co-operate.
- Individual Topics (covering Green Belt, the provision of gypsy and traveller pitches, housing supply and growth, brownfield land, cultural heritage, waste, landscape, woodland, biodiversity, green infrastructure, renewable energy, transport, water, flooding and the coast).

A high level summary of the issues raised and the response to those is set out below. A more detailed summary of the responses is presented in Appendix F.

Table 1.1 Summary of consultation responses

Issue	Summary of consultation responses to the previous Environmental Report	Response
The overall approach taken to SEA	The Environment Agency supported the broad approach to the analysis presented in the October 2011 environmental reports. Natural England recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the Yorkshire and Humber Plan on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.	Chapter 1 of the environmental report sets out how the report meets the requirements of the SEA Directive. The impacts of revoking, retaining or partially revoking the Regional Strategy for Yorkshire and the Humber have been assessed in detail in the short, medium and long term against the 12 SEA topics. This includes Cultural Heritage – including architectural and archaeological heritage.
Assessment	The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of Local Plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.	The environmental report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the Regional Strategy for Yorkshire and the Humber in the short, medium and long term against all 12 SEA topics, taking into account the content of Local Plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-technical summary is provided.
Reliance on the NPPF	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the environmental report takes account of

Issue	Summary of consultation responses to the previous Environmental Report	Response
	Framework was finalised.	the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the Yorkshire and Humber plan would weaken certain policies, particularly the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
Reliance on the Duty to Co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Government has introduced a new Duty to Co-operate and supporting regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the Local Plan independent examination. In addition the NPPF sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The NPPF also sets out the requirements for sound Local Plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.
Individual Topics	Respondents raised a number of questions about individual topics. In particular, respondents thought that the impact of the revocation of the Yorkshire and Humber Plan could impact on Green Belt, the provision of gypsy and traveller pitches, housing supply and growth, brownfield land, cultural heritage, waste, landscape, woodland, biodiversity, green infrastructure, renewable energy, transport, water, flooding and the coast.	Individual policies for the planning of individual topics is described in the environmental report, drawing on the policies set out in the NPPF.

1.6 Structure of this Report

The assessment in this Environmental Report builds on the earlier assessment that was published for consultation in October 2011 and in particular includes further work in response to consultees' comments. This includes additional work to revise and update the baseline and contextual information used in the assessment, a necessary strengthening of the evidence base used as well as providing greater detail in the assessment itself. The approach that has been undertaken is set out in **Section 3.1** with the resulting information presented in **Appendices C, D, E, G and H**. This Environmental Report is a stand-alone document and there is no requirement to refer back to the previous report on the revocation of the Yorkshire and Humber Regional Strategy published on 20th October 2011.

Table 1.2 sets out how the information requirements of Annex I of the SEA Directive are met in this Environmental Report. Reasonable alternatives are considered in Section 2 and the approach taken to the assessment is explained in Section 3. Section 4 summarises the likely significant effects of revoking the Regional Strategy for Yorkshire and the Humber along with reasonable alternatives, where identified, including any secondary, cumulative, synergistic, short, medium and long-term, permanent and

temporary, positive and negative effects. Section 5 provides a summary of the key findings along with proposed monitoring measures.

Table 1.2 SEA Directive Requirements and where they are covered in the Environmental Report

SEA Directive Requirements	Where covered in the Environmental Report?
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):</p>	
<p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes</p>	<p>Section 2 outlines the contents and main objectives of the plan.</p> <p>Section 3 presents a summary of the relationship with other relevant plans and programmes.</p> <p>Appendix E (the SEA topic information chapters) presents greater details the other plans and programmes that are relevant to the plan.</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</p>	<p>Appendix E (the SEA topic information chapters) outlines the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>
<p>c) The environmental characteristics of areas likely to be significantly affected</p>	<p>Appendix E (the SEA topic information chapters) outlines the environmental characteristics of areas likely to be significantly affected.</p>
<p>d) Any existing environmental problems which are relevant to the plan or programme 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.</p>	<p>Appendix E (the SEA topic information chapters) outlines any existing environmental problems.</p>
<p>e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation</p>	<p>Appendix E (the SEA topic information chapters) outlines the relevant environmental protection objectives.</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)</p>	<p>Appendix D, Appendix E and Section 4 outline the likely significant effects of the Plan on the SEA issues.</p>

SEA Directive Requirements	Where covered in the Environmental Report?
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Appendix E and Section 4 outline the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse effects of the plan.
h) An outline of the reasons for selecting the alternatives dealt with, and a 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;	Section 2 outlines the reasons for selecting the alternatives. Section 3 contains and a description of how the assessment was undertaken including any difficulties encountered.
i) A description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 5 presents proposals for monitoring.
j) A non-technical summary of the information provided under the above headings	A non-technical summary is provided.

2. The Plan to Revoke the Regional Strategies

2.1 Overview

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*”.¹¹ The objective was to make Local Plans, and where desired neighbourhood plans, the basis for local planning decisions. The Government’s proposal is to replace the eight regional strategies outside London with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to realise their aspirations for housing and economic growth.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies, and gave the Secretary of State powers to revoke in full or in part the existing strategies by order.

The Regional Strategy under consideration for revocation comprises the Yorkshire and Humber Plan published by the then Secretary of State in 2008 and the Regional Economic Strategy published by Yorkshire Forward in 2006.

The individual policies from the Yorkshire and Humber Plan are presented in **Appendix A** and the whole Plan can be viewed at:

<http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/goyh/plan/regplan/?a=42496>

The vision, goals and actions from the Yorkshire and Humber Regional Economic Strategy are presented in **Appendix H** and can be viewed at:

<http://www.nelincs.gov.uk/council/planning-policy/evidence-base/regional-documents/regional-economic-strategy-yorkshire-humber/>

This section sets out the key aspects of the plan to revoke the regional strategies, the implications for the Yorkshire and Humber region and the alternatives considered.

2.2 Key Aspects of the Plan to Revoke the Regional Strategies

The National Planning Policy Framework (NPPF) was published on 27 March 2012. This followed extensive consultation during 2011 and replaces government planning policy and mineral policy guidance for England. It provides ‘*a framework within which local people and their accountable councils*

¹¹ HM Government (2010), The Coalition: our programme for government

can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.' Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It does not contain waste planning policy, nationally significant infrastructure projects and Traveller policy, all of which are in separate policy documents but to be read in conjunction with the NPPF.

In the absence of the Yorkshire and Humber Plan, strategic and cross authority working will be delivered in the Yorkshire and Humber region through a variety of legislative and non-legislative means. This includes: the preparation of joint plans under the powers set out in the Planning and Compulsory Purchase Act 2004; through the new duty to co-operate under the powers set out in section 33A of the PCPA 2004 (as inserted by section 110 of the Localism Act). This combination of measures aims to ensure that strategic planning operates effectively in the absence of the regional strategies. The sections below describe some of the partnership working that is already taking place across the Yorkshire and Humber region.

2.2.1 Partnership Working on Strategic Planning Issues

The Planning and Compulsory Purchase Act 2004 provides for two or more councils to prepare joint Local Plans either through joint working under section 28¹² or through the establishment of a joint committee under section 29.

The NPPF sets out the Government's policy on strategic planning priorities, including the priorities on which authorities should work jointly. It makes clear that local planning authorities should work collaboratively to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in Local Plans, resulting in a final position where plans are in place to provide the infrastructure necessary to support current and projected future levels of development.

2.2.2 Duty to Co-operate

Section 110 of the Localism Act 2011 inserts a new section 33A into the Planning and Compulsory Purchase Act 2004: the duty to co-operate. The duty is a new requirement¹³ on local authorities and other public bodies to work together constructively, actively and on an ongoing basis in relation to

¹² Where authorities work together under section 28 they have the option of establishing a joint committee under section 101 of the Local Government Act 1972. The authorities who are party to the joint committee must also comply with the requirements of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (SI2000 No. 853) as amended by the Local Authorities (Functions and Responsibilities) (Amendment) (No.2) Regulations 2005 (SI2000 No. 714). This means that the joint committee cannot make decisions which are the responsibility of the Authority and not its executive, these must be taken by each constituent authority individually (they include decisions about the submission, adoption and withdrawal of local plans).

¹³ Through Regulations made under Section 33A of the PCPA 2004, which came into force on 6 April 2012, the duty to co-operate is extended to bodies such as the Environment Agency and Natural England.

planning for strategic, cross-boundary matters in local and marine plans. Local Plans should include strategic policies on certain issues in line with paragraph 156 of the NPPF; however, the list in 156 is not exhaustive and it is for authorities to determine whether there are additional strategic priorities in their areas and what strategic policies should cover.

The Localism Act requires authorities to demonstrate to an independent inspector how they have met the duty when their plans are submitted for examination in public. There is no prescribed way to meet the duty to co-operate, but compliance could for example be demonstrated by plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that authorities may not pass the examination process.

Over time, it is expected that the duty to co-operate will become an integral part of the preparation of sound Local Plans that are effective and deliverable in relation to strategic cross boundary matters. Ongoing engagement and joint working, for example in the form of strategic infrastructure assessments done in consultation with others, memorandums of understanding and statements of common ground should become much more common place in the evidence base demonstrating how co-operation is securing delivery of objectively assessed plan needs.

2.2.3 Local Development Orders (LDOs)

The Planning and Compulsory Purchase Act 2004 allows for the establishment of local development orders. These allow local authorities to extend permitted development rights for certain forms of development with regard to a relevant local development document. The establishment of an LDO potentially speeds up the planning process and provides greater certainty to developers. LDOs are being used extensively across enterprise zones as the main means by which to simplify the planning process. There are currently 23 LDOs in place across all enterprise zones and it is anticipated that there will be a further 19 LDOs in place this year. Where enterprise zones straddle more than one local authority area local planning authorities have been working in partnership to create a planning framework for the zone and to simplify planning.

2.2.4 Local Enterprise Partnerships

The Government has facilitated the establishment of Local Enterprise Partnerships (LEPs). These are business led locally-owned partnerships between local authorities and businesses providing strategic leadership in driving private sector growth and job creation in their area. There are 39 LEPs now in place covering the whole of the country. These are based around a locally determined economic geography which makes sense to the local business community. All are playing a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. LEPs are non-statutory and hold no statutory powers, but they are able to draw upon the powers held by their constituent public bodies.

LEPs and local planning authorities are able to work together to ensure economic activity and infrastructure delivery is co-ordinated across local authority boundaries. The duty to co-operate also requires local authorities and other public bodies to have regard to the activities of LEPs when they are preparing strategic policies in their local and marine plans and undertaking related activities. This is intended to strengthen strategic planning on economic activity and infrastructure delivery.

The Government has allocated £730m of Growing Places Fund to LEPs. The Growing Places Fund will enable targeted investment in pieces of infrastructure which unlock viable schemes that are not able to proceed because capital constraints have reduced the flow of investment in the physical infrastructure which enables development (e.g. transport, utilities and flood defence). The fund should also be used to establish revolving funds.

Beyond these broad parameters LEPs are free to decide for themselves how their allocation is best invested and where.

2.2.5 Examples of Cross-Authority Working in Yorkshire and Humber Region

Local Development Orders

To simplify the planning framework in line with the Enterprise Zone requirements, Local Development Orders (LDOs) have been introduced to enhance permitted development rights. There is an adopted LDO for Sheffield, one in Hull covering the the Port of Hull, and two in Leeds covering the Aire Valley. Three further LDOs have been submitted for Rotherham awaiting approval from the Secretary of State.

Sheffield

The Sheffield LDO covers part of the Sheffield City Region Enterprise Zone site. The site is known as Europa Link and is part of the Sheffield Business Park (the site of the former runway of Sheffield Airport) and additional land occupied by the Tinsley Bridge Group. It adjoins the already successful early phases of the Sheffield Business Park which is predominantly offices occupied by a range of world class businesses such as Fujitsu, Siemens and Stanley Tools. This LDO grants planning permission (subject to planning conditions) for specified uses in the Enterprise Zone, with the aim of promoting economic regeneration through advanced manufacturing and related technology, together with other related uses which support these industries.

Port of Hull

The Port of Hull LDO has been created to attract renewable energy associated businesses to the newly formed Humber Enterprise Zone areas in the Hull port area. Enterprise Zone status will see the creation of thousands of new jobs in the area. The Port has had a long history of development, having adapted to the changing economic demands of local, regional, national and international markets. Today, it handles a wide variety of cargo including containers, liquid bulks including oils, dry bulks, timber, steel and other metals, Ro/Ro traffic and passenger traffic. From west to east the Port of Hull comprises in-dock facilities at William Wright Dock, Albert Dock, Alexandra Dock, King George Dock and Queen Elizabeth Dock.

The Port of Hull LDO applies to sites at Alexandra Dock and Queen Elizabeth Dock. The LDO simplifies planning arrangements by granting outline planning permission for development associated with renewable and low carbon industries, such as the offshore wind energy sector subject to a number of planning conditions. Developers are still required to submit planning applications for details of appearance, landscaping, layout, and scale.

Aire Valley

The Lower Aire Valley is a major economic development opportunity for Leeds City Region. In total it extends to over 1,300 hectares and contains some 400 hectares of land available for development in the short to medium term. It is located in the south east of Leeds within the urban area and along both sides of the River Aire Corridor extending from the heart of the city centre to the M1 motorway and beyond. The unique selling point for Aire Valley Leeds remains the delivery of a sustainable new district for the city delivering growth through an additional 30-40,000 jobs and up to 10,000 new homes. This is reflected in the granting of Urban Eco Settlement status for the area by the City Region. The Enterprise Zone incorporates four major development sites within Aire Valley Leeds which front onto the new East Leeds Link Road (A63) which opened in 2009. These are the sites that are eligible for business rates relief. Together the sites provide 142 hectares of development land suitable for office, research and development, industrial and distribution uses.

The first LDO grants planning permission for the installation, alteration or replacement of the following types of solar panels on any non-domestic building within the Aire Valley Leeds area. The second permits sets out the details of extensions, alterations and changes of use that will be permitted on the Aire Valley Leeds Enterprise Zone sites and in wider industrial areas of the Aire Valley.

Local Enterprise Partnerships in Yorkshire and Humber

There are four LEPs in Yorkshire and the Humber.

The **Leeds City Region Partnership** is a public-private sector partnership working to support economic growth across a £53 billion economy. It brings together the eleven local authorities of Barnsley, Bradford, Calderdale, Craven, Harrogate, Kirklees, Leeds, Selby, Wakefield and York and North Yorkshire County Council to ensure the city region economy continues to grow.

The Leeds City Region LEP area has a workforce of 1,358,200 (representing 5.5 per cent of the national total) and 82,470 businesses. The vision of this LEP is to raise economic performance by creating a sustainable economy that balances economic growth with a high quality of life, and lowers carbon emissions - becoming the natural alternative to London for investors. Key priorities are to develop:

- a sustainable housing offer that responds to the needs of the local populations;
- a workforce that has the skills that businesses need;
- sustainable green infrastructure that supports economic development;

- the growth of a range of key economic sectors including the environmental technologies sector;
- a globally competitive economy in which businesses innovate openly, and universities operate to support a growing and evolving business base;
- a sustainable and reliable transport system requisite of a globally competitive economy; and
- an economy capable of attracting quality foreign direct investment.

The LEP is developing the Aire Valley Enterprise Zone on a 142.42ha site whose aim is to support companies investing in modern manufacturing, with a focus on sectors such as medical technology, food production and low carbon energy machinery. The LEP estimate that the Enterprise Zone will create approximately 3,780 jobs by April 2015. They have led successful Regional Growth Fund (RGF) bids working with other Partnerships: Listen Media Company Limited (Liverpool and Sheffield LEPs) and Visit England (York\North Yorkshire, Cornwall and Manchester LEPs).

The **Sheffield City Region Partnership** is a collaboration between businesses and the eight local authorities of the Sheffield City Region including Barnsley, Bassetlaw, Bolsover, Chesterfield, Doncaster, North East Derbyshire, Rotherham and Sheffield. The LEP area has a workforce of 759,300 (3 per cent of the national total) and 39,530 businesses. Its stated objective is to help determine local economic priorities and lead economic growth within the area. The vision of the Sheffield City Region Partnership is:

...“to make a greater contribution to the UK economy through a local economy less dependent on the public sector. This includes creating the conditions for businesses to grow and providing a centre for advanced manufacturing and materials and local carbon industries...”

Key priorities include:

- supporting and developing key sectors including advanced manufacturing, low carbon industries, creative and digital, and healthcare; includes establishing a national growth hub for advanced manufacturing and materials;
- creating more jobs and tackling the causes of worklessness;
- accelerating rates of business start-ups and growth;
- raising skills levels and improving educational attainment; and
- unlocking the economic potential of key development areas, including improving support for strategically important companies and potential inward investors, securing new forms of finance for businesses and infrastructure projects and developing a Digital Hub to get the best out of existing assets.

The LEP has launched the Sheffield City Region Enterprise Zone covering 145 hectares targeting six sites around the M1 owned by the private sector. The focus is to attract and accelerate investment in the

following key sectors: Modern Manufacturing, Creative and Digital Industries, Healthcare Technologies and Low Carbon and Environmental Goods and Services. They have developed successful RGF projects with other Partnerships: RoadTankers Northern Ltd (with the Humber LEP), Brunton Shaw UK's investment (with Derby Derbyshire Nottingham Nottinghamshire LEP), Narec Development Services Limited – Offshore Wind Supply Chain Innovation Package (with Manchester, Sheffield and Derby Derbyshire Nottingham Nottinghamshire LEPs and 22 other districts) and The Listen Media Company (with Liverpool and Leeds LEPs).

The LEP and Local Authorities have agreed to take a unified approach to planning across all Enterprise Zone sites. Companies thinking of investing on Sheffield City Region Enterprise Zone sites will find that Planning Authorities are working together to make their move to the City Region “as straightforward as possible”. Councils will prioritise planning applications within the Enterprise Zone and obtaining planning permission will be made quicker and easier. The Memorandum of Understanding is an agreement between the Sheffield City Region Local Enterprise Partnership, Barnsley Metropolitan Borough Council, Bolsover District Council, Chesterfield Borough Council, North East Derbyshire District Council, Rotherham Metropolitan Borough Council and Sheffield City Council (referred to as ‘Enterprise Zone Planning Authorities’).

The **Humber Partnership** is a collaboration of local business partners and East Riding, Hull, North East Lincolnshire and North Lincolnshire councils. The vision is to attract new investments, generate growth from existing businesses and focus resources for maximum impact. In particular, co-ordinate public/private sector activity targeted at renewable energy, logistics and chemicals sectors. Key priorities of the LEP include:

- Co-ordinating public and private sector activity that is targeted at growing the three key growth sectors (renewable energy, ports and logistics, and chemicals), with the aim of developing an international-scale renewable energy super cluster around the Humber.
- Leading the 16-19 and adult skills strategy, particularly in relation to the key sectors listed above, to ensure that as many of the jobs created as possible can go to local people, businesses can recruit the workforce they need to expand, the aspirations of young people are raised and graduate retention is improved.
- Taking responsibility for the “Humber Brand”, co-ordinating and promoting the offer for international trade and as a location for investment.
- Lead on international trade issues to help more companies export their goods and services.
- Leading on co-ordinating and identifying strategic transport and infrastructure priorities that will support economic growth.
- Co-ordinating activity that supports innovation and enterprise.
- Bringing together partners where appropriate to bid for public and private sector contracts and funding.

- Leading on the Enterprise Zones (as follows) that have been established in the Humber and explore any other opportunities that arise from new Government policy.

The Humber Renewable Energy Super Cluster (355 ha) is focused on securing four Original Equipment (large turbine) Manufacturers (OEMs) on north and south banks of the Humber. The Enterprise Zone has potential to deliver 12,500 jobs, creating an internationally important hub for the offshore wind energy sector. The Humber Green Port Corridor Enterprise Zone (131 ha) is focused on targeting additional OEMs. Together, both Enterprise Zones have the potential to radically restructure the Humber economy, creating up to 20,000 highly skilled jobs in one of the most deprived parts of the country and would help to ensure that the offshore wind turbine supply chain benefits are maximised in the UK. As a Centre for Offshore Renewable Engineering (CORE) the LEP are seeking to build on the Enterprise Zone offer to ensure that every business looking to invest in offshore wind is supported to do so. The LEP led a successful RGF2 bid for Humber Green Port Growth (linked to the Enterprise Zone) to develop the local supply chain for renewable energy.

The **York, North Yorkshire and East Riding Partnership** is a collaboration of local business partners and nine local authorities (Craven, East Riding of Yorkshire, Hambleton, Harrogate, Richmondshire, Ryedale, Scarborough, Selby and York) covering a large area that encompasses much of the rest of Yorkshire and the Humber. This LEP has a workforce of 543,000 (2.2 per cent of the national total) and 44,710 businesses.

The aim of the LEP is to “*make things happen*” to achieve positive outcomes that are relevant to the private sector helping businesses in York, North Yorkshire and the East Riding start up, grow and become more competitive. The priorities include:

- Agri-food.
- Tourism.
- High Speed Broadband.
- Business Support.
- Business Networks.
- Coastal Regeneration.
- Skills and Training.

The LEP is pioneering a new approach to accessing bank finance by working with the British Bankers Association to establish a Certificate of Business Growth. This will help business develop robust business plans and prove to the banks that they are ready for investment. They are ensuring that their area fully maximises the potential of high speed broadband to enable business growth and improvement. The LEP is involved in the development and management of the £3m broadband support programme being developed. A broadband demand tool is also being developed.

Other Partnership Working

In Yorkshire, a **Leeds City Region (LCR) Partnership** has been formed to cover 11 local authorities and brings together local authority leaders in a joint committee. The LCR has also been granted a consultative role over major planning applications within the eleven local authorities it covers to ensure that they are better handled and to provide strategic oversight. And indeed, the partnership intends to take “a more proactive strategic role in creating a more supportive environment for investment”.

The strategy focuses on the ‘strategic’ issues that need to be achieved across the city region and covers planning, economic development and investment priorities. The aim is to have one plan delivered through the two organisations - the LCR Partnership and the LEP.

In North Yorkshire, a joint approach to developing evidence to inform planning for strategic infrastructure priorities is underway through the **York Strategic Infrastructure Planning** work. This joint approach informs strategic infrastructure development in York and its neighbouring authorities. It builds upon existing evidence and strategies, particularly the RSS and sub-regional strategies. Although at an early stage, this evidence gathering work is being used to support the development of current Local Plan preparation but may over time, evolve to support longer term strategic planning in the area.

Environmental Partnerships in Yorkshire and the Humber

Local Nature Partnerships (LNPs) are a key initiative in the Natural Environment Paper and their importance is identified in the National Planning Policy Framework. The ambition for LNPs is that they will help their local area to manage the natural environment as a system and to embed its value in local decisions for the benefit of nature, people and the economy. To do this effectively they will need to be self-sustaining strategic partnerships of a broad range of local organisations, businesses and people with the credibility to work with and influence other local strategic decision makers. Applications to become a Government-recognised LNP opened on 2 April 2012 and closed on 6 June 2012. Fifty applications were made, including several in the York and Humber Region. The Government published a list of the first partnerships to gain LNP status in July 2012.

The Natural Environment White Paper committed Government to assist partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new **Nature Improvement Areas (NIAs)**, based on a local assessment of opportunities for restoring and connecting nature on a significant scale. The importance of NIAs is recognised in the National Planning Policy Framework and local authorities will be able to support them in their Local Plans. In February 2012 the Government announced 12 initial NIAs in England that will receive government funding. One of them is these Humberhead Levels which is part of the vast flatlands straddling the borders of Yorkshire, Lincolnshire and Nottinghamshire. The area offers the best opportunity in England to develop a major multi-functional wetland landscape in a largely unrecognised biodiversity hotspot. The NIA covers 49,700 hectares within the Humberhead Levels National Character Area. The NIA will be administered and driven by the Humberhead Levels Partnership which was established in 2001.

Waste and Minerals Partnerships in Yorkshire and the Humber

The following authorities have been working jointly to deliver their minerals and waste strategies:

- Hull City Council and the East Riding of Yorkshire Council.
- City of York & North Yorkshire Waste Partnership.
- Barnsley, Doncaster and Rotherham.

2.3 Background and Description of the Regional Strategy for Yorkshire and the Humber to be Revoked

2.3.1 Legislative Background to Regional Strategies

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.

Initially, the Regional Spatial Strategy (RSS) for each region consisted of existing regional planning guidance. 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. In revising their RSS, regional planning bodies were required to have regard to the Regional Economic Strategy (RES) for the region.

RES were introduced by the Regional Development Agencies Act 1998. Until 1 April 2010, each Regional Development Agency (RDA) was required to formulate, and keep under review, a strategy in relation to its purposes, and have regard to the strategy in exercising its functions. The purpose of RDAs included furthering the economic development and the regeneration of its area, promoting business efficiency and investment and contributing to the achievement of sustainable development where it is relevant to its area to do so.

The Local Democracy Economic Development and Construction Act 2009 introduced regional strategies (RS). These came into existence on 1 April 2010 for the eight English regions outside London. The intent was that each RS would initially consist of the existing RSS and the RES for the region but for the

responsible authority in each region to bring forward a revised RS. However no revised RS were adopted so each RS continues to consist of the existing RSS and the RES.

The Planning and Compulsory Purchase Act 2004 was amended so that local development documents were required to be in general conformity with the RS and the RS became part of the statutory development plan for the purposes of determining planning applications. For the purposes of the development plan however, the RS for a region consists of only the existing RSS and not the RES. This was originally intended to be for an interim period prior to adoption of a revised RS.

The Localism Act 2011 made significant changes to the 2009 Act repealing the requirement for there to be a RS in each region outside London and confirming that the RS for the purposes of the development plan includes only the existing RSS.

2.3.2 The Development of the Yorkshire and Humber Plan (Regional Spatial Strategy)

The Regional Strategy for Yorkshire and the Humber (known as the Yorkshire and Humber Plan) replaced the Regional Spatial Strategy issued in 2004, which was itself based on a selective review of the former regional planning guidance for Yorkshire and the Humber (RPG12, 2001). Public consultation on the Plan closed in April 2006, with approximately 320 respondents providing 3,000 comments. An examination in public was held between September and October 2006. The Secretary of State published 'proposed changes' in September 2007 which responded to the recommendations of the panel who conducted the examination in public of the submission draft of the strategy. Public consultation on these changes was held from September to December 2007. Having considered responses to that consultation, the Yorkshire and Humber Plan was published in May 2008. The chronology is set out in the box below.

Preparation of the Yorkshire and Humber Plan was informed by sustainability appraisal at both the submission draft 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 Directive. The chronology is set out in the box below.

Event	Date
Consultation on Issues and draft Project Plan	Sept 2003
Consultation on draft spatial vision with sustainability appraisal	July 2004
Sustainability appraisal scoping report published	Nov 2004
Consultation on Topic Papers	Feb-Mar 2005
Public consultation on draft regional spatial strategy and sustainability appraisal report. Preparation of draft Habitat Regulations Assessment	Jan-Apr 2006
Examination in Public	Sept-Oct 2006
Panel report published – proposed changes prepared with updated sustainability appraisal report	May-Sept 2007

Public consultation on proposed changes and updated sustainability appraisal report and Habitat Regulations Assessment	Sept-Dec 2007
Regional Spatial Strategy published with final sustainability appraisal report and adoption statement, and Habitat Regulations Assessment	May 2008

2.3.3 The Content of the Yorkshire and Humber Plan

The Yorkshire and Humber Plan covers the period from 2006 to 2026 and has the following spatial vision:

“In Yorkshire and Humber over the next 15 to 20 years there will be more sustainable patterns and forms of development, investment and activity, and a greater emphasis on matching needs with opportunities and managing the environment as a key resource.”

The Yorkshire and Humber Plan contains:

- a spatial vision and core approach;
- policies for sub-areas;
- policies related to the environment, such as, biodiversity and landscape;
- policies related to economic development;
- policies related to the scale and distribution of new housing provision; and
- a regional transport strategy.

Intended outcomes, indicators and targets are set out for each of the Yorkshire and Humber Plan policies. Further details of the individual policies are set out in **Appendix A**. The Plan’s main objectives are set out in Policy YH1 in the form of an overall approach and key spatial priorities:

- Transform economic, environmental and social conditions in Regeneration Priority Areas – the older industrialised parts of South Yorkshire, West Yorkshire and the Humber.
- Manage and spread the benefits of continued growth of the Leeds economy as a European centre of financial and business services.
- Enhance the role of Sheffield as an important business location within its wider city region.
- Optimise opportunities provided by the Humber Ports as an international trade gateway for the region and the country.
- Support Principal Towns and Local Service Centres as hubs for the rural and coastal economy and community and social infrastructure and encourage diversification of the rural economy.

- Protect and enhance the region's environmental resources including areas of international and national importance, and the character and qualities of the Region's coast and countryside including for economic and social development.
- Avoid exacerbating environmental threats to the region and reduce the region's exposure to those threats.
- Avoid increasing flood risk, and manage land and river catchments for flood mitigation, renewable energy generation, biodiversity enhancement and increased tree cover.
- Ensure that transport management and investment support and help deliver the spatial strategy.

The Yorkshire and Humber Plan sets out the need for selective reviews of Green Belt boundaries to meet development needs and protect cultural heritage, including the Green Belt around York, and the West Yorkshire Green Belt. It also requires local planning authorities to provide at least 22,260 net additional homes to the dwelling stock over the period 2004 to 2026. In summary, growth and change will be managed to achieve sustainable development and the spatial vision. Local Plans, strategies and investment decisions and programmes should aim to achieve the following outcomes:

- The long-term trend of population and investment dispersal away from the Regional and Sub Regional Cities and Towns has been reversed.
- Cities and towns have been transformed and are attractive, cohesive and safe places where people want to live, work, invest and spend time in.
- Principal Towns are fulfilling their role as focal points for rural communities.
- Urban and rural economies are more diverse and competitive, creating more and better jobs.
- Inequalities have been reduced, the health and well-being of the population has improved, and currently excluded communities and areas requiring regeneration have benefited from development and investment.
- People have better accessibility to opportunities and facilities, the use of public transport and walking and cycling has increased, and growth in traffic congestion and transport-related emissions has been addressed.
- Environmental quality has been raised, resource demands from development minimised, and the region is responding proactively to the global and local effects of climate change.
- The use of the region's land and existing social, physical and green infrastructure has been optimised.

The Yorkshire and Humber 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 (RES -see below for more details produced by Yorkshire Forward) and the Regional Housing Strategy.

2.3.4 The Content of the Yorkshire and Humber Regional Economic Strategy

The RES provides the following vision for the Yorkshire and Humber economy and covers the period up to 2016:

'to be a great place to live, work and do business, that fully benefits from a prosperous and sustainable economy'.

Three cross-cutting themes (sustainable development, diversity and leadership and ambition) underline the RES and its headline goals that cover:

- More business.
- Competitive business.
- Skilled people.
- Good jobs.
- Transport, infrastructure and the environment.
- Stronger cities, towns and rural areas.

The RES was developed with regional partners and was subject to a formal consultation and SEA process.

2.3.5 The Relationship Between the Yorkshire and Humber Plan and the Regional Economic Strategy

The Yorkshire and Humber RES complements the Yorkshire and Humber Plan (RSS). Locational priorities in the RES are in-line with RSS policies and the RSS is framed to support sustainable economic growth as set out the RES. Both:

- Use the same evidence base sharing a foundation in economic forecasts based on the Yorkshire Futures econometric model.
- Recognise and plan around the same geographic areas to address needs and realise opportunities across the whole of the region, including cities and city regions as key regional drivers, towns, market towns, more remote rural areas, and coastal areas.
- Join up housing and economic development in the same priority locations and promote housing renovation, replacement rates and design standards to meet the needs of the future, including policies to ensure development and investment benefits communities, especially in disadvantaged areas.

- Place stress on development and investment in cities and major towns with an emphasis on good accessibility by public transport in order to maximise accessibility for people and address congestion and environmental impact.
- Make the renaissance of cities and towns a key priority with an emphasis on integrating development and investment and avoiding any development that would undermine renaissance priorities.
- Recognise and address the issues facing rural areas with policies to support market towns and more remote rural areas, adopting an approach that reflects key opportunities and needs, and which is of a scale appropriate to each settlement.
- Foster the growth and expansion of businesses, stress the importance of business development particularly in priority clusters, sectors and locations that need to regenerate their economies, and emphasise the importance of key economic assets to the region's economy, including the key role of universities and other higher education institutions.
- Adopt clear transport policies that place emphasis on priorities and schemes that bring economic benefit as well as other social and environmental benefits in line with the principles of good access, minimising congestion and sustainable development.
- Include proposals to promote environmental quality in the region. This includes promotion of renewable energy, effective flood risk management, the enhancement of environmental assets, a focus on quality of place, high standards of design, green infrastructure, energy efficiency in new developments, and resource efficiency in business.

2.3.6 Structure Plans

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 relevant regional spatial strategy, or development plan documents for the relevant local authorities. Section 109(5) of the Localism Act provides for the revocation of saved structure plan policies.

No structure plan policies were saved in the Yorkshire and Humber region, as noted in **Appendix B**.

2.3.7 Local Plans

In relation to plan-making, development plan documents prepared by local authorities are required to be in general conformity with the Regional Strategy.

Regional spatial strategies form part of the statutory development plan¹⁴.

Local Development Plan Documents developed in accordance with the PCPA 2004 include Core Strategies, Area Action Plans and Site Allocation Plans. Core Strategies set out the spatial planning vision, principles and key planning policies for an area. This portfolio of documents is known collectively as the Local Development Framework. Approximately a third of local planning authorities in Yorkshire and the Humber have adopted development plan documents under the PCPA 2004.

The remaining local planning authorities in Yorkshire and the Humber, who were yet to adopt a development plan document under the PCPA 2004 have Local Plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990.

On revocation of the Regional Strategy, the statutory development plan would comprise any saved Local Plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the powers brought forward by the Localism Act. 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.

A list of Local Plans in the Yorkshire and Humber region¹⁵ and their current composition is included at **Appendix C**. There are a total of:

- 17 Local Plans adopted by May 2008;¹⁶
- Eight Core Strategies adopted shortly before or after May 2008, when the Yorkshire and Humber Plan was adopted;¹⁷
- Three Minerals and Waste Local Plans covering four authorities adopted by May 2008 (other authorities deal with minerals and waste in their Local Plan or Core Strategies);
- Two minerals and waste DPDs covering four authorities were adopted after May 2008.

¹⁴ By virtue of section 82(2) of the Local Democracy, Economic Development Act 2009 as amended by the Localism Act 2011, a Regional Strategy for the purposes of section 38(3)(a) of the Planning and Compulsory Purchase Act 2004 is to be regarded as consisting solely of the regional spatial strategy that subsisted for that region immediately before 1 April 2010.

¹⁵ There are 23 Local Planning Authorities (LPA) within the Region.

¹⁶ 14 LPAs have Local Plans adopted before May 2008. East Riding of Yorkshire have prepared four Local Plans. In 2005 York's draft Local Plan was approved by the LPA for use in development control decisions but has never been adopted. Therefore, 15 out of 23 local authorities are yet to adopt a core strategy and, for the purposes of this assessment, their current plans are not considered to reflect the RSS.

¹⁷ Core Strategies adopted shortly before or after May 2008 will have been drafted either in parallel with preparation of the Yorkshire and Humber Plan or after its publication. They will therefore be in general conformity with the Regional Strategy and, for the purposes of this assessment, can be considered up to date.

2.4 Reasonable Alternatives to the Plan to Revoke the Regional Strategies

Regional strategies set targets such as housing numbers for local authorities. In some areas this proved highly controversial, generated thousands of objections and is not consistent with the principles of localism. Government believes that democratically elected local authorities working with their local people are better placed to assess and plan for the needs of their community, and make planning decisions, rather than unelected regional bodies. The Government therefore proposes revoking the Regional Strategy for Yorkshire and the Humber.

Consideration of the reasonable alternatives to a proposed policy or plan is a fundamental aspect of policy and planning development. Providing clear, reasoned justification for selection of a preferred planning policy following assessment of the alternatives is a pre-requisite for the preferred direction to gain wider and long term support. Recording the reasons for the selection of the preferred option can also aid any subsequent review, particularly if the assumptions that underpin any alternatives change over time.

In order to meet the requirements of the SEA Directive and the relevant UK transposing regulations, the Government is also required to present specific information concerning reasonable alternatives. Article 5 (1) of the SEA Directive (2001/42/EC) 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 the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*”. Information to be provided includes “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I (h)).

The European Commission guidance on the SEA Directive discusses possible interpretations of handling ‘reasonable alternatives’ as required by Article 5(1). It states that “*The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme...*”

On this basis, the starting point for identifying alternatives to the revocation of the Yorkshire and Humber Regional Strategy has been the powers of the Secretary of State in regard to the regional strategies. As previously stated, the Secretary of State has the power to partially revoke or fully revoke the Regional Strategies by Order.

The previous Environmental Report on the proposed revocation of the Yorkshire and Humber Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the Yorkshire and Humber Regional Strategy entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F) including partial revocation. These were:

- reviewing the regional strategies;
- revoking the regional strategies but saving key policies;

- the retention of the Regional Strategy system with regional groupings of local authorities responsible for drafting them and adoption by the Secretary of State;
- maintaining the plans and revising certain policies in order to make the plans more acceptable, as well as the possibility of local authorities producing joint development plans to cover specific issues; and
- revoking certain chapters or parts of the strategies and introducing transitional arrangements.

A number of alternatives are therefore considered as follows:

- **Retention**
 - Retention of the Yorkshire and Humber Regional Strategy but not updating it in the future; or
 - Retention of the Yorkshire and Humber Regional Strategy and updating and maintaining it in the future, this would be done either by the Secretary of State; or regional groupings of local authorities followed by adoption by the Secretary of State; or by groups of local authorities working together to produce joint development plans to cover specific issues; or
- **Partial revocation of the Yorkshire and Humber Regional Strategy either by**
 - Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining the non spatial policies, ambitions and priorities; or
 - Retaining all the spatially specific policies where a quantum of development or land for development is allocated to a particular location in the region and revoking the non spatial policies, ambitions and priorities; or
 - Retention of sub-regional policies and priorities and revoking the rest of the Regional Strategy; or
 - Retention of policies, ambitions and priorities, the revocation of which may lead to likely significant negative environmental effects; or
- **Revocation** of the entire Yorkshire and Humber Regional Strategy.

Each alternative is discussed below in regard to its reasonableness.

2.4.1 Retention

Retention of the Yorkshire and Humber Regional Strategy but not updating it in the future

This option would mean that: the Yorkshire and Humber Regional Strategy was not revoked, that all the policies within the Yorkshire and Humber Plan would remain part of the development plan for the

purposes of determining planning applications and that Local Plans would continue to need to be in general conformity with the Regional Strategy but that the strategy would not be updated in the future. It is assumed that the policies, ambitions and priorities would not be revoked when the existing lifetime of the Regional Strategy was reached.

Some policies in the Yorkshire and Humber Plan are potentially in conflict with the intent of the National Planning Policy Framework (NPPF) which sets the Government's planning policies for England and how these are to be applied e.g. H1 on the provision and distribution of housing.

The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. The NPPF intends to ensure that the Local Plan is at the heart of the plan-led system and in preparing Local Plans local authorities should plan to meet objectively assessed needs for housing and other forms of development which should include collaboration with other bodies where appropriate. Since Local Plans are required to be in general conformity with the Regional Strategy, and planning decisions need to be in accordance with the Yorkshire and Humber Plan unless material considerations indicate otherwise, this also adds potential conflict with the policies set out in the NPPF.

Since there is no statutory power available for the Secretary of State to update the Yorkshire and Humber Regional Strategy, over time the strategy would become increasingly out of date. Therefore it is expected that retention of the policies, ambitions and priorities in the Yorkshire and Humber Regional Strategy, without update, could gradually lead to a decline in the positive effects that the strategy aimed to deliver and potential conflicts with policies that local communities wish to pursue will increase. Nevertheless, since the retention of the Yorkshire and Humber Regional Strategy forms an alternative approach to strategic planning across the region **it is considered to be a reasonable alternative.**

Retention, maintenance and updating of the Yorkshire and Humber Plan

This option would mean that the Yorkshire and Humber Regional Strategy was not revoked, that the Yorkshire and Humber Plan would remain part of the development plan for the purposes of determining planning applications and that Local Plans would continue to need to be in general conformity with the Regional Strategy - but that it would continue to be maintained and updated in the future. However, the Localism Act has removed the regional planning tier and revoked the power to update the existing regional strategies. This means that the Secretary of State does not have the statutory powers to maintain or update the Yorkshire and Humber Regional Strategy and therefore, **the amendment of the regional strategies by the Secretary of State is not considered to be a reasonable alternative because there is no power to do it.**

The 2004 Planning and Compulsory Purchase Act does provide for joint working by local authorities and county councils. In addition the Localism Act sets out the Duty to Co-operate, which requires local planning authorities to work together when preparing strategic cross boundary policies in their local and marine plans. This means that groups of local authorities can work together and formally adopt a statutory Local Plan covering their joint areas and could choose to work together to adopt and maintain a plan over the region. Whilst there is substantial evidence of local authorities already working at the

regional scale on specific issues of responsibility and mutual benefit (such as waste management), it seems highly unlikely that all local authorities within the region, irrespective of background, circumstance and political composition would work in unison to update the Yorkshire and Humber Regional Strategy, particularly where such a position would place them in conflict with national government policy. **In consequence, this is not considered to be a reasonable alternative.**

2.4.2 Partial Revocation of the Yorkshire and Humber Plan

Revocation of all the quantified and spatially specific policies

This option would mean that all quantified policies (such as for a renewable energy target) or policies that are spatially specific and which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. within Yorkshire and Humber Plan sub-area policies and policies for minerals, forestry and woodland, waste management facilities, employment land and job provision, housing provision and distribution, affordable housing, and pitches for gypsies and travellers) would be revoked, but the non spatial policies would be retained. This would leave the policies in place which would set out a spatial vision for the region as well as policies that encourage particular types of development or seek to protect environmental resources and services as well as seeking wider sustainability objectives. These policies would not be updated in the future as the Secretary of State no longer has the statutory powers to do this. These policies would therefore be retained but would become increasingly obsolete as local authorities in the region update their plans to reflect these issues in their own Local Plans. **This is considered to be a reasonable alternative.**

Revocation of all the non quantitative and spatially specific policies

This option for partial revocation of the Yorkshire and Humber Regional Strategy would mean that all quantitative targets (such as the one for renewable energy) or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. sub-area policies and policies for minerals, forestry and woodland, waste management facilities, employment land and job provision, housing provision and distribution, affordable housing, and pitches for gypsies and travellers) would be retained and the non-spatially specific policies, ambitions and priorities would be revoked (such as protection and enhancement of biodiversity and the historic environment).

As set out above, the policies in the Yorkshire and Humber Regional Strategy that establish a quantum of development or land for development to a particular location and/or local authority in the Yorkshire and Humber region may result in some confusion with the intent of the National Planning Policy Framework which sets the Government's planning policies for England and how these are to be applied. Regard must be had to the NPPF in the preparation of local and neighbourhood plans, and the NPPF is a material consideration in planning decisions. The NPPF intends to ensure that the Local Plan is at the heart of the plan-led system and promotes local authorities and communities to plan to meet objectively assessed needs for housing and other forms of development for their areas, and should be based on collaboration with other bodies where appropriate. Since Local Plans need to be in general conformity

with the Yorkshire and Humber Regional Strategy, and planning decisions need to be made in accordance with the Yorkshire and Humber Plan unless material considerations indicate otherwise, this could create confusion and potential conflict in the planning system.

Nevertheless, the retention of the quantified policies or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority in the region, provides an alternative approach to strategic planning, particularly where Local Plans are out of date, and do not contain up to date quantified policies such as for housing. These quantified policies could therefore be retained for a transitional period, in the short and medium term, until updated local authority plans are put in place. **This is considered to be a reasonable alternative.**

Revoking all regional policies, ambitions and priorities and retaining all sub-regional policies, ambitions and priorities

This option for partial revocation would retain the sub-regional policies, ambitions and priorities and revoke the rest of the strategy. However, as for the option above which considered retention of policies that set out a quantum of development to be delivered in a broad location or within a local planning authority area, this is in conflict with the intent of the National Planning Policy Framework. Since Local Plans need to be in general conformity with the Regional Strategy, and planning decisions need to be in accordance with the RSS (as part of the development plan), unless material considerations indicate otherwise, this creates confusion and potential conflict in the planning system.

Furthermore, it is questionable whether the sub-area policies would function correctly in the absence of regional scale policies such as on spatial planning (YH1), environmental protection, water resources and the high level apportionment policies on housing, due to the integrated nature of the Yorkshire and Humber Plan. In addition, over time the Regional Strategy policies are becoming increasingly out of date as the regional tier of planning has been removed and the regional strategies are not being kept up to date. **This is not therefore considered to be a reasonable alternative.**

Revoking all policies, ambitions and priorities except those where revocation would lead to significant negative environmental effects

The NPPF sets out national planning policies which support and protect the environment (for example: Green Belt land, meeting the challenge of climate change, flooding and coastal change and those policies conserving and enhancing the natural and historic environment, including policies to minimise impacts on biodiversity and providing net gains in biodiversity).

This option for partial revocation of the Yorkshire and Humber Regional Strategy would mean that individual policies, ambitions and/or priorities would be retained if revoking them may lead to likely significant negative environmental effects once mitigating measures have been taken into account.

This reasonable alternative would lead to the retention of individual policies in the Regional Strategy which are not likely to be in conflict with the National Planning Policy Framework and, if removed, would result in a significant environmental impact, even taking account of mitigation. This would support the

Local Plan led system and the localist approach to planning. It would not result in conflict or confusion in the planning system since the policies to be retained are likely to be consistent with those in the National Planning Policy Framework. It would be possible in the short and medium term, to retain the policies, ambitions and/or priorities for a transitional period until new Local Plans come forward to address the issue within the region. **This is considered to be a reasonable alternative.**

2.5 Summary

Following the application of the reasonableness test in compliance with Article 5(1) of the SEA Directive, the following have been taken forward for assessment within the SEA:

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

Each alternative has been assessed using the approach outlined in **Section 3**. The results of the assessment are presented in **Section 4**, with the detailed assessment contained in **Appendix D** and **Appendix E**.

3. SEA Methodology

3.1 Overview

This section sets out how the SEA has been carried out. This includes the steps in the SEA process, when it was undertaken and by whom (**Section 3.1**), the scope of the assessment and the topics considered (**Section 3.2**), the baseline and contextual information used (**Section 3.3**) and the approach taken to completing the assessment (**Section 3.4**). Technical difficulties encountered during the assessment are also summarised (**Section 3.5**).

The approach to this assessment builds on the methodology employed in the Environmental Report published in October 2011. The steps that have been undertaken to-date and their relationship to the requirements of the SEA Directive are summarised in **Table 3.1**. However, this Environmental Report is a stand-alone document and there is no requirement to refer back to the previous report on the revocation of the Yorkshire and Humber Regional Strategy published on 20th October 2011.

Table 3.1 The SEA process and key steps undertaken during the environmental assessment of the proposed revocation of the regional strategies

SEA process	Key steps in the environmental assessment of the revocation of the regional strategies
<p>Article 3 (1) requires that an environmental assessment shall be carried out for certain plans (as defined in Article 3 paragraphs 2-4) which are likely to have significant environmental effects.</p> <p>Member States are required to determine whether these plans are likely to have significant environmental effects either through case-by-case examination and/or by specifying types of plans in order to ensure that plans with likely significant effects on the environment are covered by the Directive (Article 3(5)).</p> <p>Member States must make their conclusions under Article 3(5), including the reasons for not requiring an environmental assessment, available to the public (Article 3(7)).</p>	<p>The Government announced its intention to carry out a voluntary environmental assessment of the revocation of the regional strategies in a Written Ministerial Statement on 5 April 2011. The requirements of Articles 3(5) and (7) did not therefore apply.</p>
<p>Article 5 (4) requires that 'designated environmental authorities' for strategic environmental assessment are consulted when deciding the scope and level of detail which must be included in the environmental reports.</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 define these "Consultation Bodies" for plans that relate to England as the Countryside Agency and English Nature (now amalgamated to form Natural England), the Environment Agency and</p>	<p>The Consultation Bodies in England¹⁸ were consulted on the scope and level of detail of the environmental reports on 6 May 2011, and were given 5 weeks as required by regulations to respond. The equivalent bodies in the Devolved Administrations were also consulted.</p> <p>Their comments were used as the basis for deciding the scope and level of detail of the material included in the environmental reports. Consideration was also given to more detailed textual comments</p>

¹⁸ The Environment Agency, English Heritage and Natural England

SEA process	Key steps in the environmental assessment of the revocation of the regional strategies
English Heritage.	provided by the consultation bodies.
<p>Article 5 (1) states that where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and the geographical scope of the plan, are identified, described and evaluated.</p> <p>The environmental report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail of 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 to avoid duplication.</p>	<p>An Environmental Report was prepared for each region. Each considered the likely significant effects of revoking the Regional Strategy within the context of wider reforms to the planning system. This included the publication of the NPPF, decentralising planning powers to local authorities, and introducing a Duty to Co-operate to support local authorities in both delivering for their local communities and addressing strategic cross-boundary issues.</p>
<p>Article 6 requires that the draft plan and the environmental report shall be made available to the designated consultation bodies and to the public.</p>	<p>The completed Environmental Reports were sent to the Consultation Bodies in England and the equivalent bodies in the devolved administrations and simultaneously published for public consultation on 20 October 2011. The consultation period ended on 20 January 2012. As the Environmental Reports dealt with the effects of the revocation and not the adoption of plans, there were no draft plans to consult on.</p>
<p>Article 7 sets out provisions for consulting on draft plans which are likely to have a significant effect on the environment in another member State.</p>	<p>The Government did not consult any other Member State. The revocation of the regional strategies was not considered likely to have a significant effect on the environment of any other Member State, and no other Member States indicated otherwise.</p>
<p>Article 8 states that the environmental report prepared pursuant to Article 6 and the results of any trans boundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan and before its adoption or submission to the legislative procedure.</p>	<p>A total of 103 comments were received in response to the previous consultation. Annex F provides a summary of the responses that are relevant to the revocation of the Regional Strategy for Yorkshire and the Humber. Each response has been carefully considered and as appropriate informed this updated environmental assessment.</p>

As a result of considering the responses received, the changes made to the approach to this assessment have included:

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 SEA Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the plan to revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.
- Providing additional information in the assessment of revocation and retention of each Regional Strategy policy explicitly against all 12 of the SEA Annex I(f) topics.
- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects.

- Providing additional information on likely secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects of the plan to revoke the regional strategies.
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy.
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate.
- Providing further information that includes proposals to monitor any significant effects.

This SEA of the plan to revoke the East of England Regional Strategy was undertaken in 2012 by AMEC on behalf of DCLG.

3.2 Scope of the Assessment

The scope of this assessment reflects the potential environmental effects of revoking the regional strategies. **Section 3.2.1** sets out the core topics required for consideration by the SEA Directive and their interpretation for the purposes of the assessment. **Section 3.2.2** sets out the geographic scope of the SEA.

3.2.1 Environmental Categories Included in the Scope of the Assessment

The range of potential environmental effects under consideration has been informed primarily by the SEA Directive and Regulations, using published government guidance.¹⁹ Annex I of the SEA Directive and Schedule 2 of the SEA Regulation requires that the assessment includes information on the “*likely significant effects on the environment, including on issues such as: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationship between the issues referred to*”. These environmental categories have been used throughout this report.

In the absence of detailed guidance on their content, a number of these environmental categories (e.g. population, human health and material assets) can be subject to varying interpretation. Within this report:

- ‘population’ includes information on demographics and generic social and socio-economic issues including accessibility issues;
- ‘human health’ includes information on mortality, illness and indices of perceived well-being;
- ‘material assets’ includes information on waste management and minerals.

¹⁹ Office of the Deputy Prime Minister (2005). A Practical Guide to the Strategic Environmental Assessment Directive.

Land use is not explicitly identified in the list of 12 SEA topics; however, for the purposes of this assessment and in particular given that these are assessments of strategies whose primary objectives include the determination of the location of development, it is included under the topic of soil. The soil topic has also been expanded to include consideration of geology.

Table 3.2 shows how the categories in this report reflect those in the SEA Regulations.

Table 3.2 Categories of Effects Considered by the SEA of the plan to revoke the regional strategies

Categories in the SEA Regulations	Categories used in the SEA of the revocation of regional strategies
Biodiversity, Flora and Fauna	Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)
Population	Population (including socio-economic effects and accessibility)
Human Health	Human Health
Soil	Soil and Geology (including land use, important geological sites, and the contamination of soils)
Water	Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)
Air	Air Quality
Climatic factors	Climate Change (including greenhouse gas emissions, predicted effects of climate change such as flooding and the ability to adapt)
Material assets	Material Assets (including waste management and minerals)
Cultural heritage, including architectural and archaeological heritage	Cultural Heritage (including architectural and archaeological heritage)
Landscape	Landscape and Townscape

3.2.2 Geographic Scope of the Assessment

The SEA considers the effects revocation, partial revocation or retention of the Regional Strategy for Yorkshire and the Humber. In so doing, it examines the effects of each alternative for each policy contained in the Regional Strategy. Consideration of these effects therefore occurs at a number of geographic levels, dependent on the content, intent and specificity of the individual policy. This is at one (or more) of the following levels:

- **the national level** – the cumulative assessment includes consideration of the effects of the plan to revoke all eight regional strategies across England. This draws together the effects of the individual regional assessments and provides a view at the broader geographic scale;
- **the regional level** – the assessment includes the consideration of the effects of the plan to revoke individual Regional Strategy policies that apply at a regional level e.g. policies that encourage an integrated approach to conserving and enhancing the landscape, natural environment and historic environment;

- **the sub-regional level** – the assessment includes consideration of the effects of the plan to revoke individual Regional Strategy policies that apply to an identified sub-region or area e.g. policies that seek to promote economic regeneration of a sub-region, recognised as having a specific identity or character;
- **the local level** – the assessment includes consideration of the effects of the plan to revoke Regional Strategy policies that will have a specific effect at a local planning authority level, or will affect a specific designated area or identified infrastructure project.

The range of effects considered by the assessment therefore span from the national to the local. To ensure comprehensive geographic coverage of the potential effects, contextual information has been collated at the appropriate levels; one at national level (England) and the other at the regional level that includes reference to specific local information and sites where relevant and appropriate to do so.

Notwithstanding this, the SEA is strategic, and does not assess the detailed local or site specific issues in the same degree of detail that would typically be required for an SEA of a Local Plan document (in line with Article 4(3) and 5(2) of the SEA Directive).

3.2.3 Short, Medium and Long-Term Timescales

When considering the timing of potential effects of the plan to revoke the regional strategies, the commentary classifies effects as ‘short,’ ‘medium’ or ‘long term’. This reflects an intention to capture the differences that could arise from the plan to revoke regional strategies due to timing. For example, if the plan leads to the revocation of a specific policy that does not have an immediate equivalent (such as suitable piece of legislation or an alternate national policy) to effect ongoing delivery of the policy intent, there could be transitory effects until an alternative mechanism (such as additional policy guidance) was identified and implemented. It is also consistent with the direction contained in Annex II (2) of the SEA Directive where the characteristic of the effects should have regard to ‘the probability, duration, frequency and reversibility of the effects’.

Annex 1, paragraph 214 of the NPPF identifies a 12 month implementation period in which ‘decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.’ The period began when the NPPF was published in March 2012 and will end in March 2013.

Given the time to prepare, consult and update a Local Plan, it is assumed that all local planning authorities in England will have adopted a Local Plan within 5 years of the NPPF being published. This is a pragmatic judgement (informed by the progress of local planning authorities to produce Core Strategies in compliance with the Planning and Compulsory Purchase Act 2004) and has been made solely for the purposes of this assessment.

Finally, for the purposes of this assessment, the overall duration of the Regional Strategy to be revoked provides a defined limit to the duration of the assessment (i.e. approximately out to 2021).

Using this as the basis, ‘short term’ is defined as the remaining time in the transition period (9 months or 0.75 years), ‘medium term’ as more than 0.75 and no more than 5 years and ‘long term’ as over 5 years to the end of the Regional Strategy lifetime.

It should be noted that in practice when applying the definitions of the different terms within the assessment, the boundaries between terms are more flexible than a strict reading of the definitions implies. There are for example, instances where effects in the short term extend for a limited period into

the medium term. Where this occurs, it is recorded in the assessment commentary although it will still be only assessed as short term in the assessment matrix itself (see Section 3.4 for an explanation of the approach to the assessment).

3.3 Context and Baseline

3.3.1 Review of Plans and Programmes

The SEA Regulation requires a review of the plan to revoke the regional strategies “*relationship with other relevant plans and programmes*”. One of the first steps in undertaking the SEA is to identify and review other relevant plans, programmes, policies and strategies (herein after referred to as ‘plans and programmes’) that could have an effect on the plan to revoke regional strategies. These may be plans and programmes at an international/ European, national, regional or sub-regional level, as relevant to the scope of the revocation plan. The summary within each topic section in **Appendix E** identifies the relationships between the revocation plan and these other documents; i.e. how the plan could be affected by the other plans’ and programmes’ aims, objectives and/or targets, or how it could contribute to the achievement of any environmental and sustainability objectives and targets set out in these plans and programmes.

The review of plans and programmes also helped complete the environmental baseline and help determine the key issues. The review also provided the policy context for the assessment.

3.3.2 Collecting Baseline Evidence

An essential part of the SEA process is to identify the current state of the environment and its likely evolution under a ‘business as usual’ scenario. Only with sufficient knowledge of the existing baseline conditions can the likely significant effects of the revocation plan be identified and assessed. The SEA also requires that the actual effects of implementing the revocation plan on baseline conditions are monitored.

All the environmental topics listed in the SEA Directive and Regulations have been found to be relevant for the revocation plan (see **Table 3.2**). These were consulted upon at the scoping stage and have been amended to reflect the views of the statutory consultees.

A primary source of information has been the published sustainability appraisal, completed in 2008 to accompany the consultation on the Yorkshire and Humber Plan to provide information regarding the likely evolution of the current state of the environment without the implementation of the revocation plan. However, it is recognised that such information reflects data collected a number of years past and as such has been supplemented with more recent information from a variety of sources, including (amongst others) Department for Environment, Food and Rural Affairs, Department of Energy and Climate Change, the Environment Agency, English Heritage, Natural England and the Office of National Statistics.

3.3.3 Presenting the Context and Baseline Information

Appendix E sets out the collated contextual and baseline information, on a topic-by-topic basis, for each of the 10 assessment topics (see **Table 3.2**), structured as follows:

- **introduction** - provides an overview and definition of the topic;
- **summary of international, national and regional plans and programmes** - provides an overview of the policy context in which the revocation plan sits;
- **relevant aspects of the current state of the environment at a national and regional level** - provides an overview of the baseline and the key topic specific baseline factors which will need to be considered as part of the assessment;
- **the likely evolution of these baseline conditions without the implementation of the revocation plan** - provides an overview of how the baseline is likely to change in the absence of the revocation plan, an understanding of this is key to understanding the effects of the revocation plan on the topic area;
- **the environmental characteristics of areas likely to be significantly affected;**
- **current problems in areas of particular environmental importance** (such as those designated under the Wild Birds and Habitats Directives);
- **guidance as to how the significance of potential effects has been determined;**
- **the assessment of likely significant effects arising from the revocation plan** - including information on the potential nature and scale of effects, proposed mitigation measures (where appropriate) and measures for enhancement, assumptions and uncertainties and additional information that may be required;
- **proposed mitigation measures** – including an expansion of those measures identified including more detailed commentary on, for example, greater reliance on Water Resource Management Plans and co-operation between interested parties (under the duty to co-operate) in determining appropriate quantum of development;
- **proposed measures to monitor** the effects of the revocation plan.

3.4 Approach to Assessing the Effects

3.4.1 Prediction and Evaluation of Effects

In line with the SEA Directive and taking into account ODPM (now CLG) *Practical Guide to the SEA Directive*²⁰, the assessment process seeks to *predict the significant environmental effects of the plan or programme*. This is done by identifying the likely changes to the baseline conditions as a result of the

²⁰ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online at: <http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information has not been available, the assessment has been based on professional judgement and with reference to relevant legislation, regulations and policy.

To reflect the specific nature of the plan to revoke the regional strategies, the assessment has been completed in two stages:

- **A high level (or screening) assessment** of the effects of the proposals for each Regional Strategy policy against all SEA topics to identify those where there could be a likely significant effect (using definitions as outlined in **Table 3.4**) under retention or revocation; and
- **A detailed assessment of the likely significant effects** (both positive and negative) that were identified through the high level assessment of each Regional Strategy policy, as detailed above, presented by SEA topic and considering retention, revocation and partial-revocation.

The high level assessment is presented in **Appendix D** in an assessment matrix (see **Table 3.3**) and the detailed assessment is presented in **Appendix E** at the end of each topic chapter and summarised in **Section 4, and 5** of this report.

The high level assessments record the following in the associated commentary:

- the identification and description of the potential effects;
- when the effect(s) could occur, and how long they could last (e.g. short, medium or long term);
- the assumptions and uncertainties that underpin the assessment (and any information needed to address uncertainties);
- potential avoidance or mitigation measures for any likely significant negative effects; and
- possible enhancement measures where positive effects are identified.

Table 3.3 High Level Assessment Matrix

Alternative	Biodiversity, flora and fauna			Population & human Health			Soil and Geology			Water Quality and Resources			Air Quality			Climatic Change			Material assets			Cultural Heritage			Landscape and Townscape			Commentary			
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L				

Alternative	Biodiversity, flora and fauna			Population & human Health			Soil and Geology			Water Quality and Resources			Air Quality			Climatic Change			Material assets			Cultural Heritage			Landscape and Townscape			Commentary			
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L				
Retention																															Likely Significant Effects of Retention Mitigation Measures Assumptions Uncertainty
Revocation																															Etc

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ? this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i>						
<i>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)</i>						

3.4.2 Determining Significance

Topic-specific definitions have been developed for what constitutes a significant effect, a minor effect or a neutral effect for each of the 10 environmental issues; these can be found in the relevant topic chapters in **Appendix E**. **Table 3.4** shows an example of these definitions along with the symbols used to record the effects within the assessment.

Table 3.4 Illustrative Guidance for the Assessment of Significance for Biodiversity and Nature Conservation

Effect	Description	Illustrative Guidance
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Effect	Description	Illustrative Guidance
++	Significant positive	<ul style="list-style-type: none"> Alternative would have a significant and sustained positive impact on European or national designated sites and/or protected species. (e.g. – fully supports all conservation objectives on site, long term increase in population of designated species) Alternative would have a strong positive effect on local biodiversity (e.g. – through removal of all existing disturbance/pollutant emissions, or creation of new habitats leading to long term improvement to ecosystem structure and function). Alternative will create new areas of wildlife interest with improved public access in areas where there is a high demand for access to these sites.
+	Positive	<ul style="list-style-type: none"> Alternative would have a minor positive effect on European or national designated sites and/or protected species (e.g. – supports one of the conservation objectives on site, short term increase in population of designated species). Alternative may have a positive net effect on local biodiversity (e.g. – through reduction in disturbance/pollutant emissions, or some habitat creation leading to temporary improvement to ecosystem structure and function). Alternative will enhance existing public access to areas of wildlife interest in areas where there is some demand for these sites.
0	No (neutral effects)	<ul style="list-style-type: none"> Alternative would not have any effects on European or national designated sites and/or any species (including both designated and non-designated species). Alternative would not affect public right of way or access to areas of wildlife interest.
-	Negative	<ul style="list-style-type: none"> Alternative would have minor short-term (direct or indirect) negative effects on non-designated conservation sites and species (e.g. – through a minor increase in disturbance/pollutant emissions, or some loss of habitat leading to temporary loss of ecosystem structure and function). Alternative will decrease public access to areas of wildlife interest in areas where there is some demand for these sites.
--	Significant negative	<ul style="list-style-type: none"> Alternative would have a major negative and sustained effect on European or national designated sites and/or protected species (e.g. – prevents reaching all conservation objectives on site, long term decrease in populations of designated species). These impacts could not reasonably be compensated for. Alternative would have strong negative effects on local biodiversity (e.g. – through an minor increase in disturbance/pollutant emissions, or considerable loss of habitat leading to long term loss of ecosystem structure and function).
?	Uncertain	<ul style="list-style-type: none"> From the level of information available the impact that the Alternative would have on this objective is uncertain.

3.4.3 Specific Issues Considered When Assessing the Effects of the Plan to Revoke the Regional Strategies

When considering the effects of retention of a Regional Strategy policy, we have used the prediction of effects contained in the relevant sustainability appraisal (for this report for the Yorkshire and Humber Plan) completed to accompany the Regional Strategy. Using this information does have limitations (in that the effects identified use an evidence base of varying age, are presented in differing forms and assess effects over differing timeframes) and where these occur, additional information has been identified to supplement the assessment; however, the principle remains consistent with the requirements of Article 5(3) of the SEA Directive, *‘relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision making ... may be used’*.

When assessing the effects of revocation, the following has been considered:

- **Whether the purpose, intent or specific target could be delivered by other existing legislation or government policy?** Where the answer to this question is yes, the relevant

legislation, policy or guidance has been identified, along with any relevant regionally specific evidence to substantiate the conclusion. In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the NPPF have been referenced in the individual policy assessments to provide a substantial alternative source of planning policy relevant to the Local Plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local examples of current co-operation are also cited where available. Revocation of the Regional Strategy and the reliance on the NPPF creates a situation where there will be a delay, as some authorities will need to review and update their Local Plan to reflect NPPF policies and the needs of their local communities. In these instances where there is a lack of an up to date Local Plan, it is the opinion of AMEC that the uncertainty over policy, including the quantum and preferred location of development is likely to affect whether developers submit planning applications for new development. As a result, it is expected that there will be a lessening in the short and medium term on development activity and the resulting effects occurring; although it is noted that the application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.

- **If the purpose, intent or specific target of the Regional Strategy policy is not likely to be sustained beyond revocation, the effects have been identified, described and assessed.** Where such policy changes are determined, the effects identified, described and assessed will also be proportionate to the scope of the policy considered. For example, where the Regional Strategy policy applies uniformly across the region e.g. priorities to increase more sustainable modes of transport for passengers and freight, the promotion of agri-environment schemes or the provision of regional renewable targets, such effects will be described at the regional level. However, there are Regional Strategy policies that do have a direct and explicit consequence for local authorities such as housing, infrastructure projects, pitches for gypsies and travellers, and mineral and waste. In these instances, we have also considered the implications and effects on individual Local Plans.

Considering Effects on Local Plans

Where we have identified that revocation of a Regional Strategy policy will have an effect on the environment and that this will have a consequence for Local Plan policies and/or local areas, we have examined these effects in more detail. We have compared the policies in the Yorkshire and Humber Plan on housing allocations, allocations of pitches for gypsies, travellers and showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment, and policies on the York Green Belt and the heritage environment with the equivalent policies in Local Plan and /or core strategies in the region. This analysis is set out in **Appendix C** and has then been reflected, where relevant in the assessment of individual Plan policies (**Appendix D**).

It is also noted that the plans adopted after July 2006 are also highly likely to have been subject to SEA, given that the SEA regulation came into effect in July 2004 with a two year transitional arrangement. Where SEA has been undertaken of Local Plans and the information is in the public domain, the assessments (usually presented as a combined Sustainability Appraisal and SEA) have been reviewed when relevant to provide additional information and evidence within the assessment presented in **Appendix D**. The SEA process also provides an assurance that at the point of adoption of the Local Plan the likely significant effects of the Local Plan policies have also been identified, characterised and assessed.

Considering the Effects of the Regional Economic Strategy

The vision, goals and actions of the former Regional Economic Strategy (RES) have been presented in **Appendix H**. The vision, goals and actions have been mapped onto the policies of the former Regional Spatial Strategy (RSS) for Yorkshire and the Humber. The mapping demonstrates that the RES and RSS are inextricably linked and in many instances the policies in the RSS are the same as the commitments in the RES. Where this occurs and in order to avoid duplication of assessment, the mapping demonstrates how the effects of both have been considered in detail in **Appendix D**.

3.4.4 Secondary, Cumulative and Synergistic Effects Assessment²¹

SEA also requires that secondary, cumulative and synergistic effects of the options are assessed. These terms are explained in **Table 3.5**.

Table 3.5 Definitions of Secondary, Cumulative and Synergistic Effects

Type of Effect	Definition*
Secondary (or indirect)	Effects that do not occur as a direct result of the plan to revoke the Regional Strategy, but occur at distance from the direct impacts or as a result of a complex pathway. Examples of a secondary effect of the plan to revoke could include the materials (and embedded carbon) used in any development or infrastructure project identified.
Cumulative	Effects that occur where the revocation or retention of several individual Regional Strategy policies which each may have an insignificant effect, combine to have a significant effect. Examples of a cumulative effect of the plan to revoke Regional Strategy could include the potential effects on a European designated site, where a habitat or species is vulnerable and the cumulative effects of disturbance arising from uncoordinated development occurring simultaneously in adjacent local authorities causes a significant impact. Cumulative effects could also occur across a region or across more than one region.
Synergistic	Effects that interact to produce a new total effect that could be greater than the sum of the individual effects.

*Adapted from SEA guidance, ODPM (2005)

For the assessment of secondary, cumulative and synergistic effects to be effective, they should be considered as part of each assessment, rather than to being seen as a separate assessment. For the purposes of brevity, these effects which tend to be grouped together are captured subsequently under the heading of cumulative effects.

3.4.5 Assumptions used in the Assessment

The assumptions that have been used in the assessment are as follows:

²¹ This includes consideration of the effects in the short, medium and long terms; permanent and temporary and positive and negative effects.

- **The effects and findings of the relevant Sustainability Appraisal are valid over the lifetime of the relevant Regional Strategy; however, that there may be some variation in the short term.** For example, all regional strategies contain housing allocations, quantified on an annual basis and over the lifetime of the plan at the region and local authority level. It is evident that since adoption of the regional strategies, actual housing completions per annum are below the levels expected in each strategy. In consequence, when considering the quantum of growth in the short term, based on the actual figures to date, retention will lead to a lessening of some effects (both benefits of increased housing provision and any negative effects arising from land take and loss of any natural resources); however, we have assumed that over the lifetime of the Regional Strategy that the housing policy will still be delivered and that the medium and long term effects would remain unchanged by the short term deviation. It is appreciated that whilst this appears to be reasonable assumption, it could be affected by the health of the economy or market changes. However, determining alternative credible views on the likely future outcome of regional strategies and their expectations for new development risks adding an extra layer of subjectivity to a process that is already relying heavily on judgements about future impacts in an uncertain world.
- **For revocation, the assessments anticipate that Local Plans will be put in place consistent with the principles and policies set out in the NPPF.** This includes the presumption in favour of sustainable development and the expectation that “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system” and that “the planning system should play an active role in guiding development to sustainable solutions” (NPPF, paragraph 8). These expectations are reflected in the assessment of effects at the local level. However, it will take time for Local Plans to be put in place which may result in some uncertainties over the effects of revocation in the short and medium terms. The application of the NPPF’s presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.
- **It is assumed that local authorities will continue to work together on cross boundary strategic issues.** This will be supported by the new duty to co-operate in relation to the planning of sustainable development. 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.
- For the purposes of providing a consistent interpretation of short, medium and long term, the definitions, as set out in section 3.2.3, have been applied. The definitions of short, medium and long term reflected the assumption that for the purposes of the assessment, revocation was considered to occur concurrent with when the assessment was undertaken. This minimised the need to speculate over when exactly the regional strategies could be revoked, was compatible with the Government’s policy to rapidly abolish the Regional Strategies subject to the outcome of the consultation process, enabled the assessment to optimise the use of baseline information as evidence to inform the assessment of effects and enabled the assessment to consider the effects during any transitional period. The approach was also consistent with current SEA guidance and practice.

It should be noted that the effects of the recent Government housing and planning package changes have not been considered in detail in this assessment as policy detail is still being developed; however it

may prove that the increased emphasis on growth and development given by these proposals addresses some of the effects on the short and medium term arising from the uncertainties in those 15 authorities without Local Plans in conformity with the Regional Strategy.

3.5 Technical Difficulties

3.5.1 Assessing the Effects of Revocation is a New Requirement

Until the European Court judgment²² in March 2012, the legal understanding was that SEA was applied to the preparation and modification of relevant plans and programmes. The ruling confirms the application of the SEA Directive to the revocation of land use plans. Whilst there is guidance and relatively well established processes available to assess the effects of a plan's preparations, there is no equivalent for revocation and no established practice on how to undertake such an assessment. Necessarily then, this assessment is part of a body of emerging practice and is one of the first such that is in compliance with the SEA Directive requirements in the UK.

The method adopted to assess the likely environmental effects of revoking the regional strategies has therefore had to take account of this lack of established practice. The approach taken builds on the previous voluntary approach contained in the previous assessment of the plan to revoke the regional strategies published in October 2011 as well as the comments received from consultees.

3.5.2 Ensuring Consistency

The assessment of effects, in particular of retention of the Regional Strategy has used information from the relevant sustainability appraisal of each Regional Strategy. Whilst each sustainability appraisal has been completed in a manner consistent with government guidance, they are different in approach, format and assessment of effects which has created difficulties in ensuring that the assessment of the plan to revoke regional strategies is consistent across all eight regions. For example, some appraisals have assessed the effects of each proposed policy (South East Plan, East of England Plan) whilst others present the assessment findings thematically (the North East). Furthermore, the SEA topics considered vary in depth and detail, and their assessment (through differing assessment frameworks comprising of assessment objectives which number from 14 to 25) is also markedly different. Lastly, the sustainability appraisals were completed iteratively at different times between mid 2004 and mid 2009 and so used differing baselines to provide context for the respective assessments.

3.5.3 Varying Age and Status of Regional Strategies

This is not applicable to the Yorkshire and Humber Plan as it was published in 2008 and although a review process commenced in 2009 no revisions were adopted.

²² The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*

3.5.4 Uncertainty and Future Effects

The assessments inevitably reflect the fact that until adopted Local Plans are in place there must be some uncertainty as to their likely content and effects, notwithstanding the expectation that they will be drawn up to be consistent with national policy and subject to rigorous environmental assessment through sustainability appraisal. The environmental effects of revoking the regional strategies will clearly be dependent, to a greater or lesser extent depending on the impact under consideration, on future decisions by local authorities, individually and collectively. The uncertainty arising from local decisions has been reflected as appropriate in the assessment of the individual policies in **Appendix D** and in the consideration in the topic chapters contained in **Appendix E**.

4. Assessment of Effects of Revoking the Regional Strategy for Yorkshire and the Humber and the Reasonable Alternatives

4.1 Overview

This section presents the results of the assessment which has been carried out with sub-sections dealing with the effects of revocation, retention and partial revocation. The assessment has been carried out using the methodology described in **Section 3**.

This chapter draws in particular on detailed evidence in **Appendices D** and **E**. **Appendix D** presents the details of the assessment on a policy by policy basis and **Appendix E** presents detailed comments on each SEA topic including comments on significant effects where these have been identified.

4.2 Effects of Revoking the Regional Strategy for Yorkshire and the Humber

Table 4.1 summarises the effects of revoking the Yorkshire and Humber Plan against the 12 SEA topics. As noted in section 3.4.3, the Regional Economic Strategy commitments have been mapped onto the RSS policies (**Appendix H**). Due to the intentional overlap between them, the RSS policies include those of the RES and in order to avoid duplication, the assessment summarised in Table 4.1 has focussed on the Yorkshire and Humber Plan policies.

The following key has been used in completing the assessment.

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ? this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect. The reasons for the assessment are presented in Appendix D for each policy.</i></p>						
<p>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)</p>						

Table 4.1 Summary of the Effects of Revoking the Yorkshire and Humber Regional Strategy (with reference to the Yorkshire and Humber Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L						
RS Policy YH1	Overall approach and key spatial priorities	Revocation	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy YH2	Climate change and resource use	Revocation	+	+	+	+	+	++	++	++	++	++	++	++	+	+	++	+	+	++	++	++	++	++	++	+	+	+	+	+	+	+
RS Policy YH3	Working together	Revocation	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	
RS Policy YH4	Regional cities and sub-regional cities and towns	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	?	+	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy YH5	Principal towns	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	?	+	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy YH6	Local Service centres and rural and coastal areas	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	?	+	0	?	+	0	0	0	0	0	0	0	0	0
RS Policy YH7	Location of development	Revocation	0	0	0	+	+	++	0	0	0	0	0	0	+	+	++	+	+	++	0	0	0	0	0	0	0	0	0
RS Policy YH8	Green Infrastructure	Revocation	-	?	++	0	?	++	0	?	++	-	?	++	0	?	+	-	?	++	0	0	0	0	?	++	0	?	++
RS Policy YH9	Green Belt	Revocation	-	-	-	+	+	+	-	-	-	0	0	0	0	0	0	-	-	-	0	0	0	-	?	+	-	-	-
RS Policy LCR1	Leeds City region sub area policy	Revocation	+	+	+	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy LCR2	Regionally Significant Investment Priorities for Leeds City Region	Revocation	0	0	0	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policies SY1	South Yorkshire sub area policy	Revocation	+	+	+	+	+	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy HE1	Humber Estuary sub area policy	Revocation	0	?	+	+	+	++	0	?	+	0	?	+	-	-	-	-	-	-	0	0	0	0	0	0	0	?	+
RS Policy Y1	York sub area policy	Revocation	0	?	+	0	?	++	0	0	0	0	?	+	-	-	-	-	-	-	0	0	0	-	?	+	0	?	+
RS Policy VTL1	Vales and Tees Links sub area policy	Revocation	+	+	+	+	+	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy C1	Coastal sub area policy	Revocation	0	?	++	0	?	++	0	?	+	0	?	++	-	-	-	-	-	-	0	0	0	0	?	++	0	?	++
RS Policy RR1	Remoter Rural sub area	Revocation	0	?	++	0	?	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	0	?	+	0	?	++
RS Policy ENV1	Development and flood risk	Revocation	+	+	++	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	+	+	++

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy ENV2	Water Resources	Revocation	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy ENV3	Water Quality	Revocation	+	+	++	+	+	+	0	0	0	++	++	++	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	
RS Policy ENV4	Minerals	Revocation	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+	+	+	
RS Policy ENV5	Energy	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	
RS Policy ENV6	Forestry, Trees and Woodland	Revocation	+	+	+	0	?	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	+	+	
RS Policy ENV7	Agricultural land	Revocation	+	+	+	0	?	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	
RS Policy ENV8	Biodiversity	Revocation	+	+	++	0	?	+	+	+	++	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	+	+	++	++	++	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy E1	Creating a successful and competitive regional economy	Revocation	-	-	-	0	?	++	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy E2	Town centre and major facilities	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy E3	Land and premises for economic development	Revocation	-	-	-	0	?	++	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy E4	Regional priority sectors and clusters	Revocation	-	-	-	0	?	+	-	-	-	0	0	0	-	-	-	-	-	-	0	0	0	?	?	?	-	-	-
RS Policy E5	Safeguarding employment land	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy E6	Sustainable Tourism	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy E7	Rural economy	Revocation	+	+	+	0	?	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy H1	Provision and distribution of housing	Revocation	-	-	-	?	+	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy H2	Managing and stepping up the supply and delivery of housing	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy H3	Managing the release of land in support of interventions to address failing housing market	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy H4	Affordable Housing	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy H5	Mixed development	Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy H6	Provision of sites for gypsies and travellers	Revocation	0	0	0	-	?	+	-	?	0	-	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T1	Personal travel reduction and modal shift	Revocation	0	0	0	0	?	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	
RS Policy T2	Parking	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	?	+	0	?	+	0	0	0	0	0	0	0	0	0	
RS Policy T3	Public Transport	Revocation	0	0	0	0	?	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	
RS Policy T4	Freight	Revocation	-	-	-	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	-	-	-	?	?	?	-	-	
RS Policy T5	Transport and tourism	Revocation	0	0	0	+	+	++	0	0	0	0	0	0	+	+	++	+	+	++	0	0	0	0	0	0	0	0	
RS Policy T6	Airports	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy T7	Ports and waterways	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy T8	Rural transport	Revocation	0	0	0	0	?	++	0	0	0	0	0	0	0	?	+	0	?	+	0	0	0	0	0	0	0	0	0
RS Policy T9	Transport Investment and Management Priorities	Revocation	-	-	-	0	?	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-

4.2.1 Likely Significant Effects

Revocation of the Yorkshire and Humber Plan will lead to a range of effects across the different SEA topics and over short, medium and long terms as identified in **Appendices D and E**. A summary of the likely significant effects of revocation on the six Yorkshire and Humber Plan policy areas are presented below. Where relevant, reference is also made to the Regional Economic Strategy; however, given the duplication of policies and commitments between the two documents, it was considered appropriate to present the findings of the assessment using the broader range of policy issues presented in the Yorkshire and Humber Plan. The effects described are the absolute effects that will occur if the Regional Strategy were to be revoked (i.e. they are not presented as the marginal difference between retaining and revoking the Regional Strategy).

Spatial Vision and Core Approach

Policies YH1 – YH9 set out the spatial vision and overall framework for development in the region, complementing the National Planning Policy Framework. One of the key ambitions of the Yorkshire and Humber Plan is to support sustainable growth which meets the needs of the population. The strategy seeks to bring about development which is more sustainable by applying the principles set out in an international, national and regional context, including the UK Sustainable Development Strategy (2005). In doing so, it sets the overarching framework for the remainder of the Yorkshire and Humber Plan. These policies provide the spatial basis for implementation of the RES which sets out a vision for Yorkshire and the Humber to “be a great place to live, work and do business that fully benefits from a prosperous and sustainable economy”.

The effects of revocation will be dependent on the manner in which local authorities apply the requirements of the NPPF to their local context, however, it is anticipated that significant positive effects on biodiversity, population, health, soil, water, air, climatic factors, material assets, heritage and landscape will result in the long term. This reflects in part that a presumption in favour of sustainable development is at the heart of the NPPF and is to be seen as a golden thread running through both plan making and decision taking. The principle of sustainable development which already permeates planning will continue following revocation due to the strong emphasis in the NPPF. In particular, the NPPF expects them to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate. Furthermore, statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.

Revocation of the plan will not remove the need for housing and economic development in the region and one of the core planning principles identified in the NPPF is that planning should drive and support sustainable development through positive growth. Most of the region’s Regional and Sub Regional Cities and Towns suffered from population decline during the second half of the twentieth century and this, along with significant economic change, contributed to more concentrated levels of deprivation. Many parts of the region continue to need to be restructured and the legacies left by past

industrialisation addressed. Since Local Economic Partnerships have already been established and are active across the region to support economic growth with headline aims reflecting the locational aspects of the plan's spatial vision and core approach the same significant positive effects on population should occur in the long term. However, in the short-medium term given that only 8 out of 23 authorities in the region have adopted core strategies there are likely to be some limitations on improving accessibility and reducing inequalities for currently excluded communities and areas requiring regeneration. This is because older Local Plan policies may not reflect the need to sustainably transform socio-economic conditions in parts of the region. There are also likely to be some limitations on improving air quality (and thus health) and reducing greenhouse gas emissions through increased urban density and related public transport networks since older Local Plan policies may not steer development towards the Regional and Sub-Regional Cities and Towns. Hence there may be a delay in significant positive effects being realised in respect of population, health, air and climatic factors. However the application of the NPPF's presumption in favour of sustainable development will help where plans or policies are absent, silent or out of date.

Green infrastructure is a spatial planning issue that crosses local authority boundaries and requires direction and cooperation from a number of stakeholders including local authorities. It is anticipated that with the direction provided by the NPPF significant positive effects will result in the long term. Leeds and South Yorkshire already have non-statutory green infrastructure strategies in place which were given weight in the development of core strategies due to the RSS policy. However, not all areas have such strategies in place and it would be up to Local Nature Partnerships to develop them. This may mean that in the short to medium term important green infrastructure could be lost to development, particularly given only 8 out of 23 local authorities have an up to date core strategy in place and land allocations in older Local Plan policies may not have adequately considered the green infrastructure concept and just focussed on avoiding the development of designated sites.

If the Regional Strategy were to be revoked ahead of the adoption of a sound Local Plan that provides for development needs in York in a sustainable way and in conjunction with fully defined outer and inner Green Belt boundaries, then there would also be a risk during the period between revocation and Local Plan adoption of development being approved on land which would otherwise have been incorporated into the York Green Belt. Although an individual development is unlikely to have a significant effect, given general policies in the NPPF to protect heritage assets, cumulative erosion of the Green Belt could potentially have a significant negative effect on the special character and setting of York. In the long term it is clear from their draft Core Strategy and the fact that a draft Green Belt has been in place since the 1950s that York City Council do intend to formally adopt outer and inner Green Belt boundaries and therefore effects on heritage are anticipated to be positive assuming inappropriate development has not come forward in the interim.

Sub Area Policies

Policies LCR1 – RRI set out the Yorkshire and Humber Plan sub area policies. The policies set out how the areas should develop in terms of economic development, the environment and transport, and set out strategic patterns of development, investment priorities, and priorities in terms of joined up working although no quantum of development is specified. The sub areas include:

- Leeds City Region sub area;
- South Yorkshire sub area;
- Humber Estuary sub area;
- York Area sub area;
- Vales and Tees Links sub area;
- Coast sub area; and
- Remoter Rural sub area.

Revocation of the plan will not remove the need for housing and economic development in the sub-areas and one of the core planning principles identified in the NPPF is that planning should drive and support sustainable development through positive growth. Neither does it remove the need for local authorities to co-operate in the preparation of their Local Plans, although it does give them the freedom to decide the most appropriate priorities for their local area.

In the short-medium term given that only 8 out of 23 authorities in the region have adopted core strategies and still need to put in place updated Local Plans and as LEPs and Local Nature Partnerships take time to become fully established and effective in line with the “duty to co-operate”, there are likely to be some limitations on improving accessibility and reducing inequalities for currently excluded communities and areas requiring regeneration. Older policies may not reflect the need to sustainably transform socio-economic conditions and deliver environmental gain in parts of the region.

As the NPPF expects local authorities to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate and the LEPs have been established to deliver economic aims along with the Local Nature Partnerships to deliver environmental aims it is anticipated that significant positive effects on population, health, water, climatic factors and material assets will result in the long term.

Leeds City sub area

Though few core strategies have been adopted since May 2008, the Leeds City Region partnership has already been established to support economic growth in an area equivalent to the sub-area and non-statutory Leeds City Region strategies have been developed post-RSS for housing and regeneration, transport and green infrastructure (amongst others) which strongly reflect the proposals in LCR1 and

LCR2. The realisation of significant positive effects through improved access to job opportunities will therefore occur in the short to long term.

South Yorkshire sub area

The competing requirements of different urban centres and employment zones in the South Yorkshire sub-area require strong co-ordination to deliver the spread of development and benefits and to connect where people live to places of opportunity but the Sheffield City Region partnership has already been established helping to secure funding for economic growth within the area that fell within Yorkshire and Humber but also within the East Midlands region, links to which were not brought out in the sub-area policy itself. It aims to create the conditions for businesses to grow and providing a centre for advanced manufacturing and materials and low carbon industries which should provide significant socio-economic benefits through improved access to job opportunities in the long-term.

Humber Estuary sub area

The Hull City Region is now covered by the Humber partnership helping to secure funding for economic growth. In the long term significant positive effects on population should occur as their overall aim is to ensure the area capitalises on renewable energy, creating growth and jobs in this sector and the linked sectors constituting ports and logistics and chemicals, while also contributing to a wider private sector renaissance in the Humber. The focus on the economic regeneration of the north and south banks of the Humber means that development of the Humber Ports is likely to continue but this will still need to be realised within the statutory duty on local authorities to maintain the integrity of the Humber Estuary as an internationally important biodiversity site.

York, Vales and Tees Links, Coast and Remoter Rural sub areas

Particularly towards the coast, peripherality is likely to limit external investment and in some parts of the sub-area there is currently insufficient critical mass to support services and facilities; there is therefore a fine balance to be struck in terms of ensuring sufficient development occurs to help create this whilst ensuring protection of the environment. The York, North Yorkshire and East Riding Partnership now covers the York sub-area, the Coast sub-area, Vales and Tees Links sub-area, and Remoter Rural sub-area helping to secure funding for economic growth. It aims to address a number of issues affecting these sub-areas including agriculture, tourism and coastal regeneration which should provide significant socio-economic benefits in the long-term.

Statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development. However, on revocation because the York sub-area policy includes a specific action in relation to the York Green Belt, there would be a risk during the period between revocation and Local Plan adoption of development being approved on land which would otherwise have been incorporated into the York Green Belt as discussed above.

Environment

Policies ENV1 – ENV14 set out the Yorkshire and Humber Plan policies for the natural, built and historic environments of the region and are consistent with the RES which included actions for environmental enhancement.

The NPPF places great emphasis on the environment. Contributing to the conservation and enhancement of the natural environment and reducing pollution is one of the core planning principles in the NPPF together with conserving heritage assets in a manner appropriate to their significance. Revocation of the plan will not remove the need for local authorities to comply with NPPF policies and statutory duties in relation to environmental legislation, for example, removal of specific protection for the Sherwood Sandstone aquifer will be mitigated by the fact that abstraction from the aquifer will be governed by River Basin Management Planning and groundwater abstraction licences to manage any over-abstraction. The legal requirements for local planning authorities to ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation would be unchanged by revocation.

Leeds and South Yorkshire already have non-statutory green infrastructure strategies in place which were given weight in the development of core strategies due to the RSS policy. However, not all areas have such strategies in place and it would be up to Local Nature Partnerships to develop them. In the short-medium term given that only 8 out of 23 authorities in the region have adopted core strategies and still need to put in place updated Local Plans and as Local Nature Partnerships take time to become fully established and effective there are likely to be some limitations on delivering environmental gain in parts of the region. However, as the NPPF includes a concise but strong policy that requires local planning authorities to plan positively for the creation, protection, enhancement and management of networks of green infrastructure, significant positive effects in terms of biodiversity and landscape are likely to occur long-term.

Revocation of the minerals apportionment policy might create some uncertainty if mineral planning authorities have not endorsed any apportionment figures from their Aggregates Working Party but in the medium to long-term all mineral planning authorities will need to make provision for minerals by preparing a local aggregate assessment and ensuring that a steady and adequate supply of minerals is provided in a sustainable manner to ensure significant positive effects on population.

The waste planning authorities are expected to continue to take forward their waste plans to provide land for waste management facilities that meet their need and support the sustainable management of waste in line with national and European requirements; the duty to co-operate will assist to ensure authorities work together, whilst ensuring waste is handled safely, and enabling waste to be disposed of in the nearest appropriate installation. This will have a significant positive effect on material assets in terms of waste management. Statutory duties (e.g. Environment Agency's permitting regime) will provide mitigation for the negative effects of waste development on the environment.

Economy

Policies E1 – E7 set out the Yorkshire and Humber Plan policies for economic development. The policies aim to ensure that Yorkshire and Humber contributes fully to national, regional and local prosperity and to improve the quality of life of all who live and work in the region, creating a successful and competitive regional economy. It reflects the aims of the RES which sets out a vision for Yorkshire

and the Humber to “be a great place to live, work and do business that fully benefits from a prosperous and sustainable economy”. The RSS addresses the spatial aspects complementing the actions to support businesses and promote skills in the RES. The policies should be read alongside the Regional Economic Strategy (RES). The Yorkshire and Humber Plan supports the continued growth of the region’s economy and sets out targets for job growth. The potential job growth figures are derived from Yorkshire Future’s Regional Economic Model, which also informed the RES, and assume that the regional economy will perform well, supported by economic development and regeneration interventions seeking to close the economic performance gap between the regions; achievement will depend upon macro-economic conditions and Government and regional action.

One of the core planning principles identified in the NPPF is that planning should drive and support sustainable economic development to deliver the homes, businesses, industrial units, infrastructure and thriving local places that the country needs. The NPPF states that *‘local authorities should plan proactively to meet development needs of business and support an economy fit for the 21st century’*. Long term effects will be dependent on the manner in which local authorities apply the requirements of the NPPF to their local context, however, as the NPPF expects them to plan new development, its distribution, location and design in ways which limit greenhouse gas emissions and minimise future vulnerability in a changing climate it is anticipated that significant positive effects on population and health in terms of job opportunities and other socio-economic benefits will result in the long term.

In the short-medium term, although there is generally an oversupply of employment land across the district this may not be located in areas of need, therefore, given 15 out of 23 local authorities do not have an adopted core strategy, there are likely to be some limitations on improving employment opportunities for currently excluded communities and areas requiring regeneration. In particular, there is a shortage of employment land in York whose Local Plan, although not adopted, was approved by the LPA for development control purposes in 2005. Local Economic Partnerships have already been established across the region to support economic growth, but there may be a delay in full realisation of the economic benefits as they take time to become established and local authorities put in place their new Local Plan. However the application of the NPPF’s presumption in favour of sustainable development will help where plans or policies are absent, silent or out of date.

The scale of economic development is likely to have a significant negative effect on material assets due to increased resource use and waste generation. It is also likely to require greenfield development potentially resulting in negative effects on biodiversity and landscape resources and increase the level of traffic generation with subsequent effects on air quality and climatic factors. However, negative effects can be mitigated to a degree through the application of the NPPF policies which promote the pursuit of sustainable development.

One of the key planning principles set out in the NPPF is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. However, this should still be in accordance with other policies in the NPPF which seek to minimise environmental effects. This includes minimising impacts on biodiversity and providing net gains where possible (paragraph 109), having access to high quality public transport

facilities (paragraph 35) and aiming for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37). Revocation of the Regional Strategy would remove the broad strategic locational requirements for economic and tourism related development. However, statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.

The revocation of the policies E1 to E7 and the vision, goals and actions of the RES is unlikely to affect the need for local authorities to continue to provide for growth within the region. Providing for development and employment opportunities are expected to have significant benefits to the population. Any adverse effects arising from development will be subject to the mitigation measures set out in the NPPF and the provisions in an authority's own Local Plan.

Housing

Policies H1 – H6 set out the Yorkshire and Humber Plan policies for housing provision and mix. The policies seek to increase the level of new housing including affordable housing across the region. The provision of high quality housing to meet the needs of the Region's growing population is a key priority of the Plan. Policy H6 deals specifically with the provision of pitches on a sub-regional basis for Gypsies and Travellers.

The NPPF seeks to boost the supply of housing through a variety of measures to help ensure that Local Plans meet the full, objectively assessed needs for market and affordable housing in housing market areas as far as is consistent with other policies in the NPPF. Local authorities should consider applications for housing development in the context of the presumption in favour of sustainable development. The NPPF's implementation arrangements (paragraphs 214 and 215) which are particularly relevant to housing give weight to plans adopted since 2004 even if there is a limited degree of conflict with the NPPF. The assessment has included an assessment of Local Plans in the Yorkshire and Humber region.

In making Local Plans local authorities must consider the delivery of the homes needed in the area. However, it will be for local authorities to establish the right level of housing provision (including affordable housing and provision for gypsies and travellers) for their area in relation to an assessment of needs. In areas of both high and low demand, local authorities will need to work together using the duty to co-operate as is required under the Localism Act 2011 and paragraphs 178-181 of the NPPF to ensure that housing needs are met. The assessment has identified that in the long term there will be significant positive effects on population and health arising from the revocation as a result of an increase in housing supply (above current completion rates) where more people are housed with ensuing socio-economic benefits and benefits to health.

However, given that only 8 of 23 of local authorities (about a third) in Yorkshire and the Humber have adopted core strategies shortly before or after May 2008, the changes envisaged and the benefits that will accrue from adoption of new Local Plans will take time, and the benefits may be less significant in

the short and medium term. The greatest uncertainty will be in those 15 local authorities who do not have a Local Plan that is in general conformity with the Yorkshire and Humber Plan. For those authorities without an adopted plan the RSS provided clarity on the quantum of development required, in the short to medium term they are likely to revert back to their original Local Plan whilst they develop a replacement. So the amount of development for those local authorities without up to date Local Plans is likely to be lower than if the Regional Strategy were in place and there may be issues related to improving affordability particularly in areas with a strong housing market. There is also uncertainty in those authorities who adopted a plan in conformity with the Yorkshire and Humber Plan. This is because a partial review of the Yorkshire and Humber Plan in 2009 (although not adopted) had already identified that higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the population. The application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.

In the long term, revocation could increase the number of additional homes delivered by up to about 30,000 per annum to 2026.²³ The amount of land required (including some greenfield) may increase to accommodate local need, resulting in negative effects on biodiversity and landscape resources. The scale of housing development is likely to have a significant negative effect on material assets due to increased resource use and waste generation and increase the level of traffic generation with subsequent effects on air quality and climatic factors. However, negative effects can be mitigated to a degree through the application of the NPPF policies which promote the pursuit of sustainable development. The locally-led approach could also help ensure that the negative effects are more effectively mitigated, as housing allocations could take account of a more detailed understanding of local environmental capacity issues, possibly allowing a more diverse and locally-specific spatial distribution.

One of the key planning principles set out in the NPPF is to proactively drive and support sustainable development to deliver the homes that the country needs. However, this should still be in accordance with other policies in the NPPF which seek to minimise environmental effects. This includes minimising impacts on biodiversity and providing net gains where possible (paragraph 109), having access to high quality public transport facilities (paragraph 35) and aiming for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37). Revocation of the Regional Strategy would remove the broad strategic locational requirements for housing related development. However, statutory duties on environmental protection and policies in the NPPF should provide environmental protection in relation to development.

The Government's policy on traveller sites is to read alongside the NPPF and provides the policy

²³ This figure is based on a partial review of the Yorkshire and Humber Plan that was undertaken in 2009 and is discussed further in Appendix E, Population. The partial review identified that, in addition to the RSS housing allocation, up to 30,000 new homes per annum may be required across the region to support the growth of the region's economy over the lifetime of the plan. A summary of the review work carried out is available at <http://www.yhassembly.gov.uk/dnlds/RSS%20Update%20Spatial%20Options.pdf>

framework for these sites. The assessment has revealed that under revocation there will be positive effects on population as improved provision for gypsies and travellers is secured. However, only a few adopted plans in the district have a pitch target, Hull City Council Local Plan seeks to provide 45 pitches which more than reflects the 34 RSS pitch allocation for the Humber sub-area, Leeds will provide 56 pitches out of 86 for the Leeds City Region sub-area, and Sheffield 29 out of 78 for the Sheffield City Region sub-area. However, other adopted plans only have a generic policy regarding provision or no policy at all. Therefore, in the short to medium term it is possible that removal of sub-regional targets will delay policy making and site allocations, at least in some districts. If so, this could lead to a worsening shortfall and an increase in illegal encampments and temporary planning permissions that are not optimally located.

The revocation of the policies H1 to H6 is unlikely to affect the need for local authorities to continue to provide for growth within the region. Providing for housing development is expected to have significant benefits to the population. Any adverse effects arising from development will be subject to the mitigation measures set out in the NPPF and the provisions in an authority's own Local Plan.

Regional Transport Strategy

Policies T1 – T9 set out the Regional Transport Strategy for Yorkshire and Humber. These provide the regional framework delivery of transport investment and policy priorities to support the aims of the spatial strategy. The strategy seeks to reduce the number and length of journeys by road, and improve public transport and accessibility in the region. The strategic transport priorities include those promoted in the RES:

- faster rail services between Leeds, Sheffield and Manchester;
- demand management measures on the M62;
- improved north-south rail links from the region to London;
- improved public transport access to airports;
- improved road/rail links to the Humber Ports;
- improved rail capacity into the Leeds city region;
- improved public transport solution in the Leeds and Sheffield city regions.

The NPPF recognises the important role that transport plays in facilitating sustainable development and in contributing to wider sustainability and health objectives. It encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Local authorities are encouraged to work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure to support sustainable developments. Also managing patterns of growth to make the fullest possible use of public transport, walking and cycling is one of the core planning principles identified in the NPPF. Transport networks transcend local authority boundaries and thus effective networks will require local authorities to work together to achieve sustainable approaches – the duty to

co-operate provides the mechanism for this to happen. The Highways Agency will continue to have responsibility for the motorways and trunk roads with North Yorkshire County Council and the Unitary Authorities responsible for local transport in liaison with local authorities and LEPs as appropriate.

The NPPF requires local authorities to plan for sustainable transport, combined with the duty to co-operate this will facilitate work to promote public transport and ensure a close and mutually consistent relationship between spatial and local transport plans, to deliver appropriate sustainable transport needs and have a positive effect on air and climatic factors through reduced emissions from car-based transport due to the emphasis on sustainable transport modes but depending on the ability to change travel behaviour and the demand for transport.

Negative effects associated with strategic transport infrastructure development may be avoided if local authorities decide not to take these forward on revocation. However, it is anticipated the need to construct and maintain transport infrastructure is likely to remain. This will have a significant negative effect on material assets due to increased resource use as well as negative effects on biodiversity and the landscape in terms of land take. However, negative effects can be mitigated to a degree through the application of the NPPF policies which promote the pursuit of sustainable development and statutory duties on environmental protection.

Expansion of airport facilities could have a significant negative effect on air and climate factors. Airport planning will still have to take account of relevant aspects of policy on transport at paragraphs 29 – 41 of the NPPF. The NPPF states that, when planning for airports that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs.

4.2.2 Other Effects

The effects of the revocation of the RSS have been presented in **Appendix D** and summarised above in relation to the issues identified in the EU Directive (Annex I). Where other potential effects have been identified these are referred to in **Appendix D**.

4.2.3 Proposed Mitigation Measures

A number of mitigation measures have been identified in the detailed assessment in **Appendix D**.

Mitigation of the effects will be diverse and may need to be specific sub-regionally. For example, in planning for water provision as part of new development, there may be greater reliance on Water Resource Management Plans and co-operation between interested parties in determining appropriate quantum of development. Similarly, for issues such as biodiversity, continued co-operation and resources would be required to achieve similar commitments in relation to protecting and enhancing green infrastructure to that intended under the Yorkshire and Humber Plan.

4.3 Effects of Retention of the Regional Strategy for Yorkshire and the Humber

Retention of the Yorkshire and Humber Regional Strategy will lead to a range of effects across the different SEA topics and is identified in **Appendices D and E**. A summary of the likely significant effects of revocation on the six Yorkshire and Humber Plan policy areas are presented in **Table 4.2** and commented on below. **Table 4.2** summarises the effects of retaining the Yorkshire and Humber Plan against the 12 SEA topics. As noted in section 4.2, the Regional Economic Strategy commitments have been mapped onto the RSS policies (**Appendix H**). Due to the intentional overlap between them, the RSS policies include those of the RES and in order to avoid duplication, the assessment summarised in Table 4.2 has focussed on the Yorkshire and Humber Plan policies. Please note that within this alternative, retention is defined as the retention of all the policies within the Yorkshire and Humber Plan but without their future update. Local authorities would be expected to refer to the NPPF and to place greater weight on the NPPF, as the Plan aged, as without update it would gradually lose relevance to the changing circumstances of local communities.

The following key has been used in completing the assessment.

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ? this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect. The reasons for the assessment are presented in Appendix D for each policy.</i></p>						
<p>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)</p>						

Table 4.2 Summary of the Effects of Retention of the Yorkshire and Humber Regional Strategy (with reference to the Yorkshire and Humber Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy YH1	Overall approach and key spatial priorities	Retention	+	+	+	++	++	++	+	+	+	+	+	+	++	++	++	++	++	++	+	+	+	+	+	+	+	+	+
RS Policy YH2	Climate change and resource use	Retention	+	+	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	+	+	+	+	+
RS Policy YH3	Working together	Retention	+	+	+	++	++	++	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	
RS Policy YH4	Regional cities and sub-regional cities and towns	Retention	+	+	+	+	+	+	-	-	-	0	0	0	+	+	+	+	+	0	0	0	-	-	-	+	+	+	
RS Policy YH5	Principal towns	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	0	0	0	+	+	+	0	0	0	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy YH6	Local Service centres and rural and coastal areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy YH7	Location of development	Retention	+	+	+	++	++	++	+	+	+	0	0	0	++	++	++	++	++	++	0	0	0	-	-	-	+	+	+
RS Policy YH8	Green Infrastructure	Retention	++	++	++	++	++	++	++	++	++	++	++	++	+	+	+	++	++	++	0	0	0	++	++	++	++	++	++
RS Policy YH9	Green Belt	Retention	-	-	-	+	+	+	-	-	-	0	0	0	0	0	0	-	-	-	0	0	0	+	+	+	-	-	-
RS Policy LCR1	Leeds City region sub area policy	Retention	+	+	+	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy LCR2	Regionally Significant Investment Priorities for Leeds City Region	Retention	0	0	0	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0
RS Policies SY1	South Yorkshire sub area policy	Retention	+	+	+	++	++	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy HE1	Humber Estuary sub area policy	Retention	+	+	+	++	++	++	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	0	0	0	+	+	+
RS Policy Y1	York sub area policy	Retention	+	+	+	++	++	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy VTL1	Vales and Tees Links sub area policy	Retention	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy C1	Coastal sub area policy	Retention	++	++	++	++	++	++	+	+	+	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	++	++	++
RS Policy RR1	Remoter Rural sub area	Retention	++	++	++	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	+	+	+	++	++	++
RS Policy ENV1	Development and flood risk	Retention	++	++	++	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	++	++	++
RS Policy ENV2	Water Resources	Retention	+	+	+	+	+	+	0	0	0	++	++	++	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape			
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	
RS Policy ENV3	Water Quality	Retention	++	++	++	+	+	+	0	0	0	++	++	++	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	
RS Policy ENV4	Minerals	Retention	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+	
RS Policy ENV5	Energy	Retention	+	+	+	+	+	+	0	0	0	0	0	0	+	+	++	+	+	++	+	+	+	+	+	+	+	+	+	
RS Policy ENV6	Forestry, Trees and Woodland	Retention	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	++	++	++		
RS Policy ENV7	Agricultural land	Retention	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+		
RS Policy ENV8	Biodiversity	Retention	++	++	++	+	+	+	++	++	++	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	++	++	++	
RS Policy ENV9	Historic environment	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	++	+	+	+
RS Policy ENV10	Landscape	Retention	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	++	++	++

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy ENV11	Health, recreation and sport	Retention	+	+	+	++	++	++	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV12	Waste Objectives	Retention	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	++	0	0	0	0	0	0	
RS Policy ENV13	Provision of waste management and treatment facilities	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	++	++	++	-	-	-	-	-	-	
RS Policy ENV14	Strategic locational criteria for the location of waste facilities	Retention	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
RS Policy E1	Creating a successful and competitive regional economy	Retention	-	-	-	++	++	++	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy E2	Town centre and major facilities	Retention	?	?	?	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy E3	Land and premises for economic development	Retention	-	-	-	++	++	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy E4	Regional priority sectors and clusters	Retention	-	-	-	+	+	+	-	-	-	0	0	0	-	-	-	-	-	-	-	-	-	0	0	0	?	?	?	-	-	-
RS Policy E5	Safeguarding employment land	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy E6	Sustainable Tourism	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy E7	Rural economy	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	-	-	-	+	+	+
RS Policy H1	Provision and distribution of housing	Retention	-	-	-	++	+	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy H2	Managing and stepping up the supply and delivery of housing	Retention	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy H3	Managing the release of land in support of interventions to address failing housing market	Retention	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy H4	Affordable Housing	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy H5	Mixed development	Retention	0	0	0	++	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy H6	Provision of sites for gypsies and travellers	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T1	Personal travel reduction and modal shift	Retention	0	0	0	+	+	+	+	+	+	0	0	0	++	++	++	++	++	++	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T2	Parking	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy T3	Public Transport	Retention	0	0	0	+	+	+	+	+	+	0	0	0	++	++	++	++	++	++	0	0	0	0	0	0	0	0	0
RS Policy T4	Freight	Retention	-	-	-	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy T5	Transport and tourism	Retention	0	0	0	++	++	++	0	0	0	0	0	0	++	++	++	++	++	++	0	0	0	++	++	++	0	0	0
RS Policy T6	Airports	Retention	-	-	-	+	+	+	-	-	-	-	-	-	--	--	--	--	--	--	--	--	--	?	?	?	-	-	-
RS Policy T7	Ports and waterways	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy T8	Rural transport	Retention	0	0	0	++	++	++	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T9	Transport Investment and Management Priorities	Retention	-	-	-	++	++	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-

4.3.1 Likely Significant Effects

Spatial Vision and Core Approach

The long term significant positive effects of retention on biodiversity, population, health, soil, water, air, climatic factors, material assets, heritage and landscape are similar to revocation. Differences arise in that there is greater certainty regarding the assessment and in the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation. The assessment has not identified any areas where retention of those policies which make up the Spatial Vision and Core Approach would have a significant negative effect.

Sub-Area Policies

The significant positive effects of retention on population, health, water, climatic factors and material assets are similar to revocation. Differences arise in that there is greater certainty regarding the assessment and in the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation. The assessment has not identified any areas where retention of those policies which make up the sub-area policies would have a significant negative effect.

Environment

The significant positive effects of retention on population, biodiversity, landscape and material assets are similar to revocation. Effects are likely to be more pronounced in the short-medium term as there will be no delay in implementation. For example, Leeds and South Yorkshire have non-statutory green infrastructure strategies in place which would be given weight in the development of core strategies (and development control decisions) due to the Yorkshire and Humber Plan. Specific reference to protection of the Sherwood Sandstone aquifer, the protection of undesignated cultural heritage and landscape assets, and a desire to reduce minerals extraction in designated areas increases the significant positive effects of retention in terms of effects on water, cultural heritage and landscape.

Retaining the policy containing the renewable energy targets will have a significant long term positive effect in terms of air and climate factors by providing a framework within which local authorities should consent significant additional renewable energy capacity in their district. Retaining the policy containing the woodland creation target will have a significant positive effect on biodiversity, health, air and climate factors and the landscape.

Economy

The significant positive effects of retention on population are similar to those of revocation, although there is greater certainty regarding the assessment and in the short to medium term positive effects are likely to be more pronounced as there will be no delay in implementation.

The scale of economic development is likely to have a significant negative effect on material assets due to increased resource use and waste generation. It is also likely to require greenfield development potentially resulting in negative effects on biodiversity and landscape resources and increase the level of traffic generation with subsequent effects on air quality and climatic factors. However, negative effects can be mitigated to a degree through the application of the other RSS and NPPF policies which promote sustainable development.

Housing

By setting out the overarching direction within which Local Plans should be developed, retention of the Regional Strategy would have significant benefits in the short to medium term. It provides more certainty to the 15 local authorities who have pre-2008 plans over the scale of housing development to be delivered. However, higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the population as identified by the partial review of the Yorkshire and Humber Plan. In the long term to 2026 (due to existing shortfalls in the RSS targets as discussed in Appendix E, Population) retention of the current plan could result in an uncertain effect, this may be negative if sufficient housing cannot be delivered to meet local need but is more likely to be positive given that new Local Plans should be in accordance with both the RSS and NPPF the latter seeking to significantly boost the supply of housing to meet the needs of the local population.

As with revocation, negative effects on the environment will occur in the short-long term due to the quantum of housing development. Statutory duties on environmental protection and other RSS and NPPF policies should mitigate negative effects to a degree and provide environmental protection in relation to development.

The Government's planning policy for traveller sites is to be read alongside the NPPF and provides the policy framework for these sites. The assessment has revealed that, as with housing more generally, with retention of the Yorkshire and Humber Plan there will be positive effects on population and human health as improved provision for gypsy and travellers is secured

Regional Transport Strategy

The positive effects of retention on air and climatic factors through reduced emissions from car-based transport are similar to those of revocation. In the short term, positive effects are likely to be more pronounced as there will be no delay in implementation. Retaining the guidance on transport access will have a significant positive effect on air and climate factors.

Freight facilities, airport, port and other strategic transport infrastructure development could have a negative effect; effects on material assets and in respect of airports on air and climate factors being significant. Statutory duties on environmental protection and other policies in the RSS and NPPF should provide environmental protection in relation to development.

4.3.2 Other Effects

The effects of retaining the RSS have been presented in **Appendix D** and summarised above in relation to the issues identified in the EU Directive (Annex I). Where other potential effects have been identified these are referred to in **Appendix D**.

4.4 Effects of the Partial Revocation of the Yorkshire and Humber Regional Strategy

The reasonable alternatives to revocation that have been assessed are:

- Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies; or
- Retaining for a transitional period all the quantified and spatially specific policies where a quantum of development or land for development is allocated to a particular location in the region and revoking the non spatial policies, ambitions and priorities; or
- Retention for a transitional period of policies, ambitions and priorities, the revocation of which may lead to likely significant negative environmental effects.

4.4.1 Revoking all the Quantified and Spatially Specific Policies

Table 4.3 summarises the effects of revoking only those policies that are quantified or spatially specific.

²⁴ ²⁵

The following key has been used in completing the assessment.

Score	++	+	0	-	--	?
Key:	Significant Positive effect	Minor positive effect	No overall effect	Minor negative effect	Significant negative effect	Score uncertain

NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ? this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect. The reasons for the assessment are presented in Appendix D for each policy.

S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)

²⁴ The sub-area policies and policies that provide a quantum of development (e.g ENV4, ENV5, ENV6, ENV13, H1, H4 and H6)

²⁵ Policies E1 and E3 reference figures for potential job growth in the region so are considered to provide a quantum but the policies also allow the use of more up to date local forecasts.

Table 4.3 Summary of the Effects of Partial Revocation of the Yorkshire and Humber Regional Strategy

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy LCR1	Leeds City region sub area policy	Partial Revocation	+	+	+	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy LCR2	Regionally Significant Investment Priorities for Leeds City Region	Partial Revocation	0	0	0	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	
RS Policies SY1	South Yorkshire sub area policy	Partial Revocation	+	+	+	+	+	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy HE1	Humber Estuary sub area policy	Partial Revocation	0	?	+	+	+	++	0	?	+	0	?	+	-	-	-	-	-	-	0	0	0	0	0	0	0	?	+
RS Policy Y1	York sub area policy	Partial Revocation	0	?	+	0	?	++	0	0	0	0	?	+	-	-	-	-	-	-	0	0	0	-	?	+	0	?	+
RS Policy VTL1	Vales and Tees Links sub area policy	Partial Revocation	+	+	+	+	+	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy C1	Coastal sub area policy	Partial Revocation	0	?	++	0	?	++	0	?	+	0	?	++	-	-	-	-	-	-	0	0	0	0	?	++	0	?	++

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy RR1	Remoter Rural sub area	Partial Revocation	0	?	++	0	?	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	0	?	+	0	?	++
RS Policy ENV4	Minerals	Partial Revocation	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+
RS Policy ENV5	Energy	Partial Revocation	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0
RS Policy ENV6	Forestry, Trees and Woodland	Partial Revocation	+	+	+	0	?	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV13	Provision of waste management and treatment facilities	Partial Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	++	-	-	-	-	-	-
RS Policy E1	Creating a successful and competitive regional economy	Partial Revocation	-	-	-	0	?	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy E3	Land and premises for economic development	Partial Revocation	-	-	-	0	?	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape									
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L										
RS Policy H1	Provision and distribution of housing	Partial Revocation	-	-	-	?	+	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
RS Policy H4	Affordable Hsouing	Partial Revocation	0	0	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy H6	Provision of sites for gypsies and travellers	Partial Revocation	0	0	0	-	?	+	-	?	0	-	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Likely Significant Effects

The long term significant positive effects of partial-revocation on biodiversity, population, health, soil, water, air, climatic factors, material assets, heritage and landscape are similar to retention. Effects are likely to be more pronounced in the short-medium term as there will be no delay in implementation.

Revocation of the quantified and sub-area policies will not remove the need for housing and economic development in the sub-areas and one of the core planning principles identified in the NPPF is that planning should drive and support sustainable development through positive growth. Higher rates of house building and additional gypsy and traveller pitches may be necessary over the long term to meet the needs of the population. Therefore partial revocation would allow the right level of housing and employment provision whilst retaining the benefits of policies relating to addressing social inequalities and economic disparities in the older industrialised parts of South Yorkshire, West Yorkshire and the Humber and the issues of peripherality in the coastal and rural areas of the region particularly in the short-medium term.

Negative effects on the environment will occur in the short-long term due to the quantum of housing development. Revocation of the quantified and sub-area policies could increase the number of additional homes delivered up to about 30,000 per annum to 2026.²⁶ The amount of land required (including some greenfield) may increase to accommodate local need, resulting in negative effects on biodiversity and landscape resources. Statutory duties on environmental protection and other policies in the RSS and NPPF should provide environmental protection in relation to development. The locally-led approach could also help ensure that the negative effects are more effectively mitigated, as housing and employment allocations could take account of a more detailed understanding of local environmental capacity issues, possibly allowing a more diverse and locally-specific spatial distribution. Specific reference to protection of the Sherwood Sandstone aquifer, the protection of undesignated cultural heritage and landscape assets increases the significant positive effects of partial-revocation in terms of effects on water, cultural heritage and landscape.

Retaining the guidance on transport access will have a significant positive effect on air and climate change mitigation. Freight facilities, airport, port and other strategic transport infrastructure development could have a negative effect, effects on material assets and in respect of airports on air and climate factors being significant. Statutory duties on environmental protection and other policies in the RSS and NPPF should provide environmental protection in relation to development.

4.4.2 Proposed Mitigation Measures

A number of mitigation measures have been identified in the detailed assessment in **Appendix D**.

²⁶ This figure is based on a partial review of the Yorkshire and Humber Plan that was undertaken in 2009 and is discussed further in Appendix E, Population.

Mitigation of the effects will be diverse and may need to be specific sub-regionally. For example, in planning for water provision as part of new development, there may be greater reliance on Water Resource Management Plans and co-operation between interested parties in determining appropriate quantum of development.

4.4.3 Retaining all the Quantified and Spatially Specific Policies

Table 4.4 summarises the effects of retaining only those policies that are quantified or spatially specific.

The following key has been used in completing the assessment.

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ? this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i></p> <p><i>The reasons for the assessment are presented in Appendix D for each policy.</i></p>						
<p><i>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)</i></p>						

Table 4.4 Summary of the Effects of Retaining all the Quantified and Spatially Specific Policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy LCR1	Leeds City region sub area policy	Partial Retention	+	+	+	++	++	++	-	-	-	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy LCR2	Regionally Significant Investment Priorities for Leeds City Region	Partial Retention	0	0	0	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0
RS Policies SY1	South Yorkshire sub area policy	Partial Retention	+	+	+	++	++	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy HE1	Humber Estuary sub area policy	Partial Retention	+	+	+	++	++	++	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	0	0	0	+	+	+
RS Policy Y1	York sub area policy	Partial Retention	+	+	+	++	++	++	0	0	0	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy VTL1	Vales and Tees Links sub area policy	Partial Retention	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	++	++	++	+	+	+
RS Policy C1	Coastal sub area policy	Partial Retention	++	++	++	++	++	++	+	+	+	++	++	++	-	-	-	-	-	-	0	0	0	++	++	++	++	++	++

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy RR1	Remoter Rural sub area	Partial Retention	++	++	++	++	++	++	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	++	++	+
RS Policy ENV4	Minerals	Partial Retention	+	+	+	++	++	++	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+
RS Policy ENV5	Energy	Partial Retention	+	+	+	+	+	+	0	0	0	0	0	0	+	+	++	+	+	++	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy ENV6	Forestry, Trees and Woodland	Partial Retention	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	++	++	+
RS Policy ENV13	Provision of waste management and treatment facilities	Partial Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	++	++	++	-	-	-	-	-	-
RS Policy E1	Creating a successful and competitive regional economy	Partial Retention	-	-	-	++	++	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-
RS Policy E3	Land and premises for economic development	Partial Retention	-	-	-	++	++	++	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--	--	--	?	?	?	-	-	-

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy H1	Provision and distribution of housing	Partial Retention	-	-	-	++	+	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RS Policy H4	Affordable Hsousing	Partial Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy H6	Provision of sites for gypsies and travellers	Partial Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Likely Significant Effects

With revocation of the non-quantitative and sub-area policies the spatial vision of the Regional Strategy will be lost but it is anticipated that significant positive effects on biodiversity, population, health, soil, water, air, climatic factors, material assets, heritage and landscape will still result in the long term. This reflects in part that the spatial policies reflect the spatial vision as well as a presumption in favour of sustainable development being at the heart of the NPPF and is to be seen as a golden thread running through both plan making and decision taking. The assessment has not identified any areas where retention of those policies which make up the sub-area policies would have a significant negative effect.

Retaining the policy containing the renewable energy targets will have a significant long term positive effect in terms of air and climate factors by providing a framework within which local authorities should consent significant additional renewable energy capacity in their district. Retaining the policy containing the woodland creation target will have a significant positive effect on biodiversity, health, air and climate factors and the landscape.

The scale of housing and economic development is likely to have a significant negative effect on material assets due to increased resource use and waste generation. It is also likely to require greenfield development potentially resulting in negative effects on biodiversity and landscape resources and increase the level of traffic generation with subsequent effects on air quality and climatic factors. However, negative effects can be mitigated to a degree through the application of the NPPF policies which promote sustainable development.

The retention of the quantified and sub-area policies may result in some confusion with the intent of the NPPF and how they are to be applied. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. The NPPF intends to ensure that the Local Plan is at the heart of the plan-led system and promotes local authorities and communities to plan to meet objectively assessed needs for housing and other forms of development for their areas which should include collaboration with other bodies where appropriate. Since Local Plans need to be in general conformity with the Regional Strategy, and planning decisions need to be made in line with it, this would create confusion and potential conflict in the planning system. The retention of these policies would therefore be for a transitional period until Local Plans were revised and updated .

4.4.4 Proposed Mitigation Measures

Retaining just the quantitative and spatially specific policies and revoking the rest of the Regional Strategy would remove the measures which were included in the Regional Strategy to mitigate the adverse effects of the proposed development. However, as with revocation of the whole Regional Strategy, a number of mitigation measures have been identified in the detailed assessment in **Appendix D**.

Mitigation of the effects will be diverse and may need to be specific sub-regionally. For example, for issues such as biodiversity, continued co-operation and resources could be required to achieve similar commitments to that intended under the Yorkshire and Humber Plan.

4.4.5 Retention of Policies, the Revocation of which may lead to likely Significant Negative Environmental Effects

York is one of a handful of settlements in England which has a Green Belt whose primary purpose is to preserve the setting and special character of a historic town. Of those settlements, York is unique insofar as it is the only one whose precise Green Belt boundaries have yet to be formally defined in an adopted Local Plan (other than for certain parts of its outer boundary which lie within neighbouring authorities).

In the absence of an adopted up to date York Local Plan that defines the Green Belt boundaries, retention of sections of two policies in the Yorkshire and Humber Plan, **Policy YH9 Part C and Policy Y1 Parts C1, C2 and Key Diagram in relation to the York Green Belt** is likely to maintain the significant positive effect on cultural heritage by helping to protect the special character and setting of York. This is compared to revocation, which has the potential to cause negative effects on cultural heritage in the short term, possibly becoming significant in the medium term. This is because these two sections of policy relate to a specific action to define the inner boundaries of the York Green Belt in order to safeguard the special character and historic value of the city from the level of development proposed.

The majority of land outside the built up area has been designated as draft Green Belt since the 1950s with the principle of York's Green Belt being established through a number of plans. However, the detailed inner boundaries have never been formally approved. Retention of these two sections of policy therefore has the benefit of enabling the special character and setting of York to be protected until the City of York Council are able to adopt their Local Plan and define the boundaries of the Green Belt. It ensures that the likelihood of land being designated as part of the Green Belt is considered in development control decisions in the short to medium term. Under revocation of the Regional Strategy and these specific policies there would be a risk that, during the period between revocation and Local Plan adoption, development is approved on land which would otherwise have been incorporated into the York Green Belt potentially resulting in a permanent negative effect on the special character and setting of York. Given the general policies in the NPPF to protect heritage assets, an individual development is unlikely to have a significant effect, however, the longer the period between revocation and the adoption of local plans which are consistent with national green belt policy, the greater the opportunity for the cumulative effects of development in the Green Belt to have a significant negative effect on the special character and setting of York.

In the long term it is clear from their draft Core Strategy and the fact that a draft Green Belt has been in place since the 1950s that York City Council do intend to formally adopt outer and inner Green Belt boundaries therefore the potential negative effects on heritage are considered to only occur in the short to medium term.

The above comments are only in relation to a specific action to review the inner and fully define the outer boundaries of the York Green belt to safeguard the special character and historic value of the city from the level of development proposed. Revocation of the other sections of Policy YH9 and Policy Y1 is unlikely to result in a significant negative effect. Specific consideration has been given as to the impact of the revocation of all of YH9 and Y1 in this situation. Overall, the revocation of Policy YH9 and Policy Y1 is unlikely to result in a significant negative effect. This is because the aspect of the policy likely to have negative effects relates only to York, rather than the full geographic extent of the region covered by the policy and would occur in the specific circumstances set out in the text above.

As noted above for policies H1, E1, E3, T4 and T6, there are significant negative effects predicted, however, this is the same issue for both retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the plan itself.

4.5 Secondary, Cumulative and Synergistic Effects

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to (amongst others) secondary, cumulative, synergistic effects on the environment. As a consequence, the potential for the plan for the revocation of the Yorkshire and Humber Regional Strategy to have secondary, cumulative and synergistic effects on the region and in conjunction with other regional plans has been considered as part of each assessment and a summary of those effects identified is presented in **Table 4.5** against each of the SEA topics. Where relevant, these effects are identified as being short, medium, long term, permanent and temporary, positive and negative. This assessment is relative to the legislative and policy framework that remains in place once the regional strategies are revoked.

Table 4.5 Secondary, Cumulative and Synergistic Effects of the Plan to Revoke the Yorkshire and Humber Regional Strategy

Assessment Topic	Score	Summary
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)	+	<p>Key indicators for biodiversity are the number and extent of protected areas and their condition. In particular, the Natural Environment White Paper states that 90% of priority wildlife habitats should be in recovering or favourable condition by 2020. According to the baseline figures, the 2020 target has already been achieved in the Yorkshire and Humber region as 97.7% are in favourable or recovering condition.</p> <p>This biodiversity resource could be adversely impacted by direct or secondary effects from housing development, particularly in relation to loss of Green Belt, and transport infrastructure as detailed in Appendix E, Biodiversity. In light of the level of development it proposed the Yorkshire and Humber Regional Strategy included a number of policies that provided protection and enhancement of biodiversity and nature conservation features which have been assessed in Appendix D resulting in the overall Regional Strategy having a positive cumulative effect on biodiversity.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 (as discussed in Appendix E, Population) or alter the pattern of development in this or adjacent regions and thus the magnitude of the environmental impact, for example, increasing pressure on greenfield land. Revocation does not affect the legal requirement set out in the</p>

Assessment Topic	Score	Summary
		<p>Conservation of Habitats and Species Regulations 2012 that a local planning authority must assess the implications of any plan or project likely to have an adverse effect on the integrity of a European site in accordance with the Habitats Directive. The Directive prohibits the adoption of any such plan or project unless it must be adopted for imperative reasons of overriding public interest and there are no alternative solutions. For example, given the continued application of the legal and policy protection given to European and Ramsar sites and to SSSIs and further application of agri-environment schemes it is expected that revocation of the Regional Strategy would not change the positive direction of travel.</p> <p>Achievement of legally binding targets for water and air quality will also be significant contributory factors in improving (due to secondary and synergistic effects) the quality of areas important for wildlife, while enhanced provisions on aspects, such as, the delivery and protection of green infrastructure will play an important role in increasing the overall biodiversity value of the region. Statutory and policy protection for AONBs and National Parks will continue to protect the biodiversity value with these areas, at least in so far as the planning system is concerned. However, there may be gradual change to biodiversity resources over time due to factors, such as, climate change and coastal erosion.</p> <p>Paragraph 114 of the NPPF provides for a policy on the creation, protection, enhancement and management of networks of green infrastructure. In addition, the introduction of Local Nature Partnerships announced in the Natural Environment White Paper which will complement existing local partnerships which deal with matters such as provision of green infrastructure will improve the chances of implementation. Leeds and South Yorkshire, for example, have non-statutory green infrastructure strategies which will help deliver the benefits. Therefore, in the long term, revocation is likely to have a positive cumulative effect on biodiversity due to the protection and enhancement of green infrastructure across the region.</p>
Population (including socio-economic effects and accessibility)	++	<p>The Yorkshire and Humber Regional Strategy contains a variety of policies concerning economic development, from employment land provision to housing targets. In consequence, there are a range of significant secondary and cumulative positive effects anticipated to accrue to local communities as detailed in Appendix E, Population. Revocation is unlikely to affect this long-term.</p> <p>One of the key planning principles set out in the NPPF is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Implementation will therefore result in secondary and cumulative benefits to the region's population. However, this should be in accordance with other policies in the NPPF which seek to minimise (amongst others) secondary, cumulative and synergistic environmental effects. This includes minimising impacts on biodiversity and providing net gains where possible (paragraph 109), having access to high quality public transport facilities (paragraph 35) and aiming for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37).</p> <p>Local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. The 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. This is likely to provide similar significant secondary and cumulative benefits as retention of the Regional Strategy. For example, Leeds City Region strategies have been developed post-RSS for housing and regeneration, transport and green infrastructure (amongst others) which will help deliver secondary and cumulative benefits to local communities in the area.</p> <p>It is anticipated that inter-regional cooperation will continue in respect of regeneration and renewal in the South Yorkshire sub-area and may become stronger (resulting in secondary and cumulative benefits on population) given former East Midlands local authorities now fall within the Sheffield City Region Local Economic Partnership instead of under the East Midlands Plan.</p> <p>Links to the Tees Valley (under the North East Plan) are less certain since the former North East local authorities remain in a separate LEP to those in North Yorkshire.</p>
Human Health	+	<p>National health related policies/strategies and programmes are primarily related to improving the health of populations and reducing health disparities. The disparities referred to are primarily geographic, ethnic and economic. The Yorkshire and Humber Regional Strategy established sub-area policies to address specific sub-regional issues associated with regeneration and peripherality which would have secondary health benefits through creating local employment opportunities, improving housing quality, improving local environmental quality, and seeking to afford greater access to green infrastructure.</p>

Assessment Topic	Score	Summary
		<p>Revocation will still enable positive secondary benefits to be delivered as local authorities are required to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the socio-economic needs of their area. Similarly, revocation will not remove the need for more houses within the region. Indeed it is Government policy to boost significantly the supply of affordable housing through initiatives such as the Community Infrastructure Levy and New Homes Bonus and the local retention of business rates is intended to encourage a more positive attitude to growth and allow communities to share the cumulative benefits and mitigate the negative effects of growth. New homes are to be in locations accessible by sustainable means of transport, walking and cycling in particular are healthy activities and the NPPF is complementary to national initiatives such as the cycle to work scheme resulting in positive secondary effects on health.</p>
<p>Soil and Geology (including land use, important geological sites, and the contamination of soils)</p>	-	<p>The main adverse impacts on soil are a result of development resulting in a loss of greenfield land as discussed in Appendix E. In light of the level of development it proposed, the Yorkshire and Humber Regional Strategy included a number of policies that provided protection of soils and agricultural land resources in the region, as assessed in Appendix D, in order to minimise cumulative effects.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of the environmental impact, for example, increasing pressure on greenfield land. Revocation could in theory have a cumulative effect if the alternatives lessened existing levels of protection. However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation. Policies in the NPPF seek to protect the best and most versatile land (i.e. ALC Grades 1-3a) and local planning authorities will still be able to rely on the strong policies at paragraphs 110 – 111 of the NPPF which steer development towards land with least environmental value and support effective use of previously developed land provided it is not of high environmental value. There is also the target in the Natural Environment White Paper (NEWP) that by 2030 all of England’s soils will be managed sustainably and degradation threats tackled successfully along with further research, there remains the potential for this to be addressed in the long term.</p> <p>Paragraph 114 of the NPPF provides for a policy on the creation, protection, enhancement and management of networks of green infrastructure. In addition, the introduction of Local Nature Partnerships announced in the Natural Environment White Paper which will complement existing local partnerships which deal with matters such as provision of green infrastructure will improve the chances of implementation.</p> <p>It is still likely that greenfield land will be affected particularly in West Yorkshire and the Leeds-Bradford corridor therefore cumulative effects are likely to be negative (as would have been the case with retention).</p>
<p>Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)</p>	0	<p>The main adverse impacts on water are a result of development increasing pressures on water resources (compounded by the effects of climate change) and increasing the amount of wastewater to be disposed of. In light of the level of development it proposed the Yorkshire and Humber Regional Strategy included a number of policies that provided protection of water resources in the region, which have been assessed in Appendix D, in order to minimise the cumulative effect.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of cumulative environmental impact, for example, increasing pressure on the Sherwood Sandstone aquifer. However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation by a range of organisations therefore the cumulative effect is considered to be neutral.</p> <p>Negative secondary, cumulative and synergistic effects will be avoided by the fact that abstraction from the aquifer will be governed by the River Basin Management Plan, Catchment Abstraction Management Strategies (CAMS) and groundwater abstraction licences to manage any over-abstraction. The Environment Agency will continue to work with OFWAT, the water companies and other partners including the local authorities through River Basin Management Planning and CAMS to ensure the timely provision of the appropriate additional infrastructure for water supply to cater for the levels of development in the area in line with their water resource plans required under the Water Resources Management Plan Regulations. In managing water resources secondary, cumulative and synergistic effects on biodiversity sites will need to be taken into account.</p>

Assessment Topic	Score	Summary
Air Quality	0	<p>The main concern in relation to air quality is the level of growth of transport linked to the anticipated level of growth in homes and employment, as well as development of the Humber ports and the region's airports.</p> <p>In light of the level of development it proposed the Yorkshire and Humber Regional Strategy included a number of policies that sought to address transport growth and to achieve more sustainable transport modes such as increased use of public transport, walking and cycling to minimise secondary and cumulative effects. However, much still depended on a number of factors including whether the population change its behaviour, pricing policy on public transport, technological advances in engine efficiency and emission standards etc.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of secondary effects on air quality by virtue of increasing the amount of traffic generated. However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation therefore the cumulative effect of revocation on air quality is considered to be neutral.</p> <p>Negative secondary and cumulative effects on current levels of air quality will be avoided by the legal requirement to achieve the air quality standards set by European Directives, underpinned by national and locally derived solutions (for example, the Action Plans for Air Quality Management Areas) and this is reflected in paragraph 124 of the NPPF which states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</p>
Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	0	<p>Yorkshire and Humber could be substantially affected by the effects of climate change (see biodiversity and water topics in particular).</p> <p>There are two key aspects to climate change considered in this assessment. The first is the extent to which the region contributes to global emissions of greenhouse gases. Growth of housing, transport movement, waste generation and energy use are areas where a secondary effect in terms of increasing carbon dioxide emissions could be seen. In light of the level of development it proposed, the Yorkshire and Humber Regional Strategy included a number of policies that sought to address transport growth and to achieve more sustainable transport modes and renewable energy targets which would help to reduce the region's contribution to climate change. The second is the extent to which planning policy facilitates adaption and mitigation of the impacts of climate change and the Regional Strategy included a number of policies relating to avoidance of development in the floodplain, creation of green infrastructure etc.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of cumulative environmental impact on climate change by virtue of increasing the amount of traffic generated. However, revocation is not considered to affect the policy intent (to move towards a low carbon economy) as it will be delivered by other policy and legislation therefore the cumulative effect of revocation on climate change is considered to be neutral.</p> <p>One of the 12 core principles of planning set out in paragraph 17 of the NPPF is to support the transition to a low carbon future, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources, for example, renewable energy development. Similarly, paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change in line with the provisions of the Climate Change Act 2008. The NPPF seeks to support the move to a low carbon future, by stating that local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions; actively support energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Specifically, local planning authorities are expected to identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supplies resulting in secondary benefits on the climate. From October 2012, the Green Deal will also improve the energy efficiency of the existing housing stock and supporting the drive to lower carbon emissions from households. There is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 and the UK Renewable Energy Strategy 2009 set out the path to meet it.</p>

Assessment Topic	Score	Summary
		Following revocation of regional strategies, local authorities will be 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 co-operate 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 duty to co-operate, 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. Shoreline Management Plans should continue to inform the evidence base for planning in coastal areas (paragraph 168). The prediction of future impacts should include the longer term nature and inherent uncertainty of coastal processes (including coastal landslip), and take account of climate change.
Material assets (Waste Management and Minerals)	-	<p>The main adverse secondary impacts on material assets are a result of development increasing demand for minerals resources and increasing the amount of waste generated as discussed in Appendix E, Material Assets. In light of the level of development it proposed, the Yorkshire and Humber Regional Strategy included a number of policies that allowed for minerals and waste planning in the region as assessed in Appendix D.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of the cumulative environmental impact, for example, increasing demand for construction material. Revocation could in theory have a cumulative effect if the alternatives lessened existing levels of protection. However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation. The minerals and waste planning authorities are expected to continue to take forward their minerals and waste plans (i) to make provision for minerals - under paragraph 145 of the NPPF – by preparing a local aggregate assessment based on average sales taking account of secondary, recycled and marine sources and (ii) provide land for waste management facilities, to support the sustainable management of waste in line with national and European requirements. Since no waste planning authority is likely to be totally self-sufficient in waste management, the duty to co-operate will ensure that the authorities work together to ensure the environmentally sound management of waste. The duty to co-operate and input from the Aggregate Working Parties will also ensure that a steady and adequate supply of minerals are provided in a sustainable manner.</p> <p>Policies in the NPPF seek to protect the best and most versatile land (i.e. ALC Grades 1-3a) and local planning authorities will still be able to rely on the strong policies at paragraphs 110 – 111 of the NPPF which steer development towards land with least environmental value and support effective use of previously developed land provided it is not of high environmental value. There is also the target in the Natural Environment White Paper (NEWP) that by 2030 all of England's soils will be managed sustainably and degradation threats tackled successfully along with further research, there remains the potential for this to be addressed in the long term.</p> <p>It is still likely that demand for minerals resources and the amount of waste generated will increase by virtue of the level of development therefore cumulative effects are likely to be negative (as would have been the case with retention). However, ensuring timely provision of appropriate waste management facilities will have significant secondary benefits on human health.</p>
Cultural Heritage (including architectural and archaeological heritage)	+	<p>Currently 21 per cent of monuments within Yorkshire and Humber are at risk, the highest proportion of any region in the country. In addition, in 2011, 4.2 per cent of high grade (grade I and II*) listed buildings were at risk, although this represents a decrease from 7.1 per cent in 1999.</p> <p>This heritage resource could be adversely impacted by direct effects or secondary effects (in relation to the setting of heritage assets) from development. In light of the level of development it proposed the Yorkshire and Humber Regional Strategy included a number of policies that provided protection and enhancement of cultural heritage features, as assessed in Appendix D, resulting in the overall Regional Strategy having a positive cumulative effect on cultural heritage.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of the environmental impact, for example, increasing pressure for development in York. Revocation could in theory have a cumulative effect if the alternatives lessened existing levels of protection. However, the NPPF together with legislation on cultural heritage provide a strong framework to maintain the current high level for protecting the existing heritage resource. For</p>

Assessment Topic	Score	Summary					
		<p>example, given the continued application of the legal and policy protection given to Scheduled Monuments, registered parks and gardens and listed buildings it is expected that revocation of the Regional Strategy would not change the positive direction of travel.</p> <p>Paragraphs 126 - 141 of the NPPF set out strong national policy on conserving and enhancing the historic environment. It states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.</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. Therefore, in the long term, revocation is likely to have a positive cumulative effect on heritage.</p>					
Landscape and Townscape	+	<p>Yorkshire and Humber is home to several landscapes of national importance and the need to protect these designations was highlighted through a number of policies in the Yorkshire and Humber Regional Strategy, as assessed in Appendix D, resulting in the overall Regional Strategy having a positive cumulative effect on landscape.</p> <p>Revocation could increase the number of additional homes delivered up to about 30,000 per annum to 2026 or alter the pattern of development in this or adjacent regions and thus the magnitude of the environmental impact, for example, increasing pressure for development in or adjacent to the National Park. Following revocation, national legislation will help protect nationally designated landscapes from pressures associated with development. Furthermore paragraph 115 of the NPPF states: <i>Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.</i> Therefore the North York Moors and Yorkshire Dales National Parks, the five AONBs in the region and the expanse of Heritage Coast will remain protected following revocation. However, there may be gradual change to landscapes over time due to factors, such as, climate change, change in agricultural practices and economic conditions.</p> <p>The NPPF also maintains the policy previously contained in PPS7 that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged (paragraph 113) while landscape character assessments should be prepared where appropriate (paragraph 170). Furthermore, Paragraph 114 of the NPPF provides for a policy on the creation, protection, enhancement and management of networks of green infrastructure. In addition, the introduction of Local Nature Partnerships announced in the Natural Environment White Paper which will complement existing local partnerships which deal with matters such as provision of green infrastructure will improve the chances of implementation. Leeds and South Yorkshire, for example, have non-statutory green infrastructure strategies which will help deliver the benefits. Therefore, in the long term, revocation is likely to have a positive cumulative effect on landscape due to the protection and enhancement of green infrastructure across the region.</p>					
Score Key:	Significant Positive ++	Positive +	No significant effects 0	Negative -	Significant negative --	Uncertain?	No relationship n/a

The plan to revoke the regional strategies is however national in scope as well as applying to the eight regions. In consequence the wider implications and effects of the plan have also been considered.

A key principle of regional planning was to seek to provide consistency and efficiency in the provision of housing, employment and associated infrastructure, along with the protection and enhancement of environmental resources. Notwithstanding counter arguments as to the effectiveness with which a Regional Strategy might be implemented, their revocation raises issues as to the impacts and unintended consequences of their replacement through a localised approach.

In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to co-operate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This could create disparities which are difficult to reconcile without significant interventions. However, under revocation there is also the opportunity for adjacent authorities in previously different regions to explore joint working which may help address some of the potential issues that could arise.

At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution. Macro-scale trends such as the decentralisation of population from urban areas are arguably more difficult to address through local initiatives, as is regeneration which might be more efficiently tackled through regional-scale policy. National transport policies such as HS2 and other measures to improve the effectiveness of national transport networks and the ease of accessibility between regions will become increasingly important to counter such potential effects.

If an effect of abolition is inter-regional differences then environmental effects could be exacerbated in some areas. For particular regions, this could be critical for resources such as water which, whilst addressed through mechanisms such as Water Resource Management Plans and the Environment Agency River Basin Management Plans, could be affected by absence of the strategic overview of regional planning which would seek to balance regional environmental capacity and the need for growth.

For the protection and enhancement of environmental resources more generally, the cumulative effects of the absence of regional policy frameworks and associated resources is harder to determine over the longer term. Whether regional strategies specifically relating to biodiversity and landscape resources, for example, can adequately realise their potential in the absence of a unifying policy framework is uncertain. Here, the cumulative impacts could be associated with increasingly lost opportunities to plan strategically for these interests.

The provision of renewable energy has been an issue which regional planning arguably seemed to be particularly fitted to help guide. Development of strategic renewable energy-generating capacity, whilst to some extent modified through co-operation, could over the longer term lead to sub-optimal provision as localised interests perhaps come to the fore, and issues over the equity of provision and national interests are increasingly difficult to reconcile. As with the enhancement of natural resources, this could present a lost opportunity, only recognised over the longer term.

4.6 In summary

For the majority of policies, it is difficult to identify clear differences between the effects of retention and revocation given the strategic nature of the Regional Strategy policies and the degree to which they already devolved responsibility to local authorities. The provisions of the NPPF means that a basic

framework for the delivery of sustainable development is in place which is compatible with the principles employed in the Regional Strategy. Local Plans can therefore readily deliver the aspirations and proposals of the Regional Strategy, using additional mechanisms such as the duty to co-operate.

The assessment of the revocation of the Regional Strategy has shown that **significant positive effects** similar to those if the Regional Strategy were retained will occur in the in the long term on all elements of the environment.

The assessment has also shown that negative effects similar to those if the Regional Strategy were retained will occur in the short-long term in respect of impacts on all elements of the environment due to the quantum of housing and employment development and the expansion of freight and airport facilities in the region. However, the effects will be minimised as far as possible through the application of policies in the NPPF and other statutory duties which are designed to ensure development is designed and located to minimise its environmental impact.

In terms of the differences, although revocation could increase the number of additional homes delivered and thus the magnitude of environmental impact, a locally led approach could ensure that in the long term development planning in respect of housing and employment allocations takes account of a more detailed understanding of local environmental capacity issues and possibly allow a more diverse and locally-specific spatial distribution. This locally-led approach could ensure that negative effects from the quantum of housing and employment development are more effectively mitigated.

One particular area where a short-medium term difference arises is in relation to cultural heritage and revocation of the policies related to the York Green Belt. The Yorkshire and Humber Plan contained a specific action to define the boundaries of the York Green Belt to safeguard the special character and historic value of the city from the level of development proposed. In the short-medium term revocation effectively removes the statutory basis for the York Green Belt, its general extent and purpose to prevent harm to the historic character. Given general policies in the NPPF to protect heritage assets, an individual development is unlikely to have a significant negative effect; however, the longer the period between revocation and the adoption of local plans which are consistent with national green belt policy, the greater the opportunity for the cumulative effects of the development on the Green Belt to have a significant negative effect on the special character and setting of York.

Many of the benefits of retention relate to spatial planning issues that cross local authority boundaries (e.g. green infrastructure) and require direction and co-operation from a number of stakeholders including local authorities to be realised. Therefore, in the case of revocation there is more uncertainty about benefits coming forward in the short to medium term where local authorities need to establish arrangements under the “duty to co-operate” to deliver such strategic policies and then reflect those arrangements in their adopted Local Plans. This may occur where plans are out of date or due to the transition period for those authorities who need to establish the arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in an adopted plan. So, whilst the duty to co-operate could well address a wide range of strategic issues, such as the delivery of green infrastructure, it is AMEC’s opinion that there is uncertainty as to how this might work, particularly in the

short to medium term, both by topic and geographically. For example, securing agreement on housing and employment levels and distribution could be easier (although not universally so) at sub-regional scale than might strategic infrastructure provision on the same or wider scale. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, could be ignored or their potential not realised.

More widely, and over the longer term, it is AMEC's view that inter- and intra-regional differences could be magnified as a result of the sum of local decisions which reflect strongly varying circumstances such as housing demand.

Mitigation of the effects of revocation is likely to be diverse and perhaps sub-regionally specific. For example, in planning for water provision as part of new development, there is likely to be greater reliance on Water Resource Management Plans and co-operation between interested parties.

5. Conclusions and Key Findings

5.1 What are the Environmental Effects of Revocation of the Yorkshire and Humber Regional Strategy?

The assessment has identified that the revocation of the Regional Strategy for Yorkshire and the Humber will be likely to result in a range of environmental effects across all of the topics identified in the SEA Directive.

The overall vision of the Yorkshire and Humber Plan is to promote sustainable development with an increased focus on needs and opportunities. This includes managing the environment as a key resource and responding to market forces to: reverse the long-term trend of population and investment dispersal away from cities and towns, diversify urban and rural economies and ensuring competitiveness, reducing inequalities and improving the health and well-being of its people. This means meeting housing needs by developing sustainable inclusive communities whilst at the same time reducing the impact on the environment through savings in energy and water use and strengthening the stock of regional environmental assets. The policies in the Yorkshire and Humber RES are complementary to this vision although more focussed on economic development.

With the revocation of the Regional Strategy, local authorities and others will need to prepare and implement their Local Plans and other planning policy documents and to take planning decisions having due regard to the NPPF. The assessment of the revocation of the plan has shown that there will be significant positive effects, similar to those if the Yorkshire and Humber Plan were retained, in the long term. This reflects the fact that in some areas, such as provision for local employment and housing needs whilst protecting and enhancing environmental capital, the intent will be continued through other government policy, notably the NPPF. In some areas of policy the NPPF strengthens previous Regional Strategy commitments.

The revocation of the Yorkshire and Humber Regional Strategy removes a number of quantitative based policies such as housing where specific dwelling allocations are made to individual local authorities. In the absence of this regional context it will be the responsibility of local authorities to work together under the duty to co-operate to best meet the needs of their areas in the most appropriate way having regard to the NPPF and where appropriate other policy and legislation. The duty to co-operate will require new ways of working for local authorities and this may lead to some delay in putting in place Local Plans and other planning policy or in establishing what the development needs are of their area having regard to the needs of others areas as well. The net effect of this may be a slowing down of housing, employment and transport development in the short and medium term as the new approaches are implemented. The application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date. However, it is AMEC's view that some issues such as renewable energy, biodiversity enhancement or landscape

conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.

The assessment of revocation of the Regional Strategy has shown that there will also be negative effects on soil, water, air, climate and material assets similar to those if the Regional Strategy were retained. These impacts will occur due to the quantum of housing development, the quantum of employment development and the expansion of freight, airport facilities, ports and transport infrastructure development in the region. The effects are likely to be minimised as far as possible through the application of the NPPF and statutory duties designed to ensure environmental impacts are minimised through design and location selection.

One particular area where a short-medium term difference arises is in relation to cultural heritage and revocation of the policies related the York Green Belt. The Yorkshire and Humber Plan contained a specific action to define the boundaries of the York Green Belt to safeguard the special character and historic value of the city from the level of development proposed. In the short-medium term revocation effectively removes the statutory basis for the York Green Belt, its general extent and purpose to prevent harm to the historic character. Although an individual development is unlikely to have a significant negative effect, given general policies in the NPPF to protect heritage assets, cumulative erosion of the Green Belt could potentially have a significant negative effect on the special character and setting of York.

The assessment has also considered the reasonable alternative of retaining the Yorkshire and Humber Regional Strategy. This has resulted in the identification of environmental effects similar to that of revocation over the long term, although there would be important differences in those effects in the short and medium term, as noted above.

5.2 Proposals for Monitoring

It is a requirement of the SEA Directive to establish how the significant effects of revoking the Regional Strategy will be monitored. Article 10(2) of the SEA Directive specifically states that, where appropriate, existing monitoring arrangements may be used to assess the success of the appropriate plan in achieving its objectives. It does not require that targets be developed for the SEA itself.

CLG's Business Plan²⁷ under section 5 'Put Communities in charge of planning' includes specific monitoring actions for the department regarding the Local Plan making progress by authorities and on compliance with the duty to co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised Local Plans. When reviewing the effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the following metrics and sources of information contained in **Table 5.1**. The proposed indicators reflect those identified in the course of the gathering the evidence for this assessment, namely the review of plans, strategies and programmes and

²⁷ CLG May 2012, Business Plan 2012-2015

collation of baseline information. They are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

Any resulting analysis of long term trends in the indicators will be used to consider whether any further mitigation or intervention is needed for the two categories identified in the SEA Directive, namely:

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

Based on the findings of this assessment, the effects that should therefore be monitored include:

- Significant effects on air (RS Policy T6);
- Significant effects on climatic factors (RS Policy T6);
- Significant effects on material assets (RS Policy E1, E3, H1, T6);
- Significant effects on cultural heritage in York (RS Policy YH9 and Y1);

Monitoring measures have also been proposed where there have been uncertain effects identified in the short-long term and these include:

- Uncertain effects on biodiversity (RS Policy YH8, HE1, Y1, C1, RR1);
- Uncertain effects on population and human health (RS Policy YH4, YH5, YH6, YH8, Y1, C1, RR1, ENV6, ENV7, ENV8, ENV9, ENV10, E1, E3, E4, E5, E6, E7, H1, H2, H3, H4, H5, H6, T1, T5, T8 and T9);
- Uncertain effects on soil (RS Policy YH8, HE1, C1, ENV6, H6);
- Uncertain effects on water (RS Policy YH8, HE1, Y1, C1, H6);
- Uncertain effects on air (RS Policy YH4, YH5, YH6, YH8, T1, T2, T8);
- Uncertain effects on climatic factors (RS Policy YH4, YH5, YH6, YH8, T1, T2, T8);
- Uncertain effects on cultural heritage (RS Policy YH8, YH9, Y1, C1, RR1, ENV9, ENV10, E1, E3, E4, H1, T4, T6, T7 and T9);
- Uncertain effects on landscape (RS Policy YH8, HE1, Y1, C1, RR1, ENV9, ENV10).

Taking this into account, of the 12 topics considered in this SEA, it is proposed that monitoring should focus on the following indicators and sources of information, as set out in **Table 5.1**.

Table 5.1 Potential Environmental Monitoring Indicators

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Condition of designated sites • Threatened habitats and species • Populations of countryside birds • Surface water biological indicators 	JNCC report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats Joint Nature Conservation Committee http://www.jncc.gov.uk/page-4241 http://jncc.defra.gov.uk/page-4239 http://jncc.defra.gov.uk/page-4238 http://jncc.defra.gov.uk/page-4235 http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF Defra http://www.defra.gov.uk/statistics/environment/inland-water/ The Environment Agency are responsible for monitoring water quality under the Water Framework Directive
Population	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Employment Information • Population • Housing and additional net dwellings 	Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region
Human Health	Annual (where information allows) trends in: <ul style="list-style-type: none"> • National Statistics – Long term illness, etc. • Crime • Deprivation • Access to and quality of the local environment 	Office of National Statistics on health Home Office, Crime Survey for England and Wales Department for Communities and Local Government statistics: Indices of Deprivation ONS (proposed measures of wellbeing)
Soil and Geology	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Land use 	Department for Communities and Local Government statistics

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
Water	Annual (where information allows) trends in: <ul style="list-style-type: none"> • % of catchments with good ecological status • Water resource availability • Per capita water consumption 	Environment Agency & Defra http://www.defra.gov.uk/statistics/environment/inland-water/ Anglian Water Anglian Water
Air	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Number of AQMAs • Number of AQMAs were exceedances occurred. 	Defra
Climatic factors	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Emission of greenhouse gases • Number of properties at risk of flooding 	DECC Statistical Release: Local and regional CO2 emissions EA
Material Assets	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Volume of construction waste and proportions recycled • Volume of hazardous waste • Volume of controlled wastes and proportions recycled • Volume of minerals extracted 	EA EA EA Yorkshire and Humber Mineral Planning Authorities
Cultural heritage, including architectural and archaeological heritage	Annual (where information allows) trends in: <ul style="list-style-type: none"> • % of heritage assets of different types that are at risk 	English Heritage 'Heritage at risk report'
Landscape and Townscape	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Change in AONBs (area, threats and quality) • Changes in Conservation Areas • Percentage who are very or fairly 	National Association of AONBs English Heritage (if 2003 survey repeated)

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	satisfied with local area <ul style="list-style-type: none"> Trend in number of vacant dwellings 	ONS (proposed measures of wellbeing) DCLG http://www.communities.gov.uk/documents/housing/xls/1815794.xls

5.3 Quality Assurance

The Government's Guidance on SEA contains a quality assurance checklist to help ensure that the requirements of the SEA Directive are met. Those relevant to this stage have been highlighted below.

Table 5.2 Quality Assurance

Objectives and Context	
The plan's purpose and objectives are made clear.	Presented in Section 2 .
Environmental issues, including international and EC objectives, are considered in developing objectives and targets.	International and European objectives and targets are identified in Appendix E .
SEA objectives are clearly set out and linked to indicators and targets where appropriate.	Section 3.1 presents the SEA Topics and Table 5.1 links these to indicators.
Links to other related plans, programmes and policies are identified and explained.	Appendix E identifies relevant plans, programmes and policies.
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	The Consultation Bodies in England ²⁸ were consulted on the scope and level of detail of the environmental reports on 6 May 2011 for five weeks. The equivalent bodies in the Devolved Administrations were also consulted on the reports for regions on their boundaries. Their comments were used as the basis for deciding the scope and level of detail of the material included in the environmental reports. Consideration was also given to more detailed textual comments provided by the consultation bodies. Section 1.5.2 presents information on scoping consultation.
The SEA focuses on significant issues.	Section 3.2 sets out the scope of the assessment. These issues reflect the views of the scoping consultees as detailed in Section 1.5.2 . The significant issues are identified in Appendix E for each of the 12 SEA topics.

²⁸ The Environment Agency, English Heritage and Natural England

Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Section 3.5 identifies the technical difficulties encountered in completing this report.
Reasons are given for eliminating issues from further consideration.	No issues were eliminated from further consideration.
Alternatives	
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Alternatives were identified in Section 2.4 .
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Alternatives were identified in Section 2.4 .
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	Refer to Section 4, 5 and Appendix D and E .
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Refer to Section 2.4 .
Reasons are given for selection or elimination of alternatives.	These are presented in Sections 2.4 and 5 .
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Refer to Appendix E where baseline information is provided for each SEA topic considered.
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practical.	Refer to Appendix C, D and E
Difficulties such as deficiencies in information or methods are explained.	These are stated throughout the report where appropriate.
Prediction and Evaluation of Significant Environmental Effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape) as relevant; other likely environmental effects are also covered as appropriate.	These are set out in Appendix D and E and summarised in Section 4 and 5 .
Both positive and negative effects are considered, and the duration of effects (short, medium, or long term) is addressed.	These are set out in Appendix D and E and summarised in Section 4 and 5 .
Likely secondary, cumulative and synergistic effects are identified where practicable.	These are set out in Appendix D and E and summarised in Section 4 .
Inter-relationships between effects are considered where practicable.	These are set out in Appendix D and E and summarised in Section 4 and 5 .
The prediction and evaluation of effects makes use of relevant accepted standards, regulations and thresholds.	Refer to individual topic chapters in Appendix E and Section 3.4.2 .
Methods used to evaluate the effects are described.	These are described in Section 3.4 .

Mitigation Measures

Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These are set out in Appendix D and E and summarised in Section 4 and 5 .
Issues to be taken into account in project consents are identified.	If relevant, these are set out in Appendix D and E and summarised in Section 4 and 5 .

Environmental Report

Is clear and concise in its layout and presentation.	The layout of the Environmental Report is set out in Section 1.6 . The structure was subject to early consultation and review as part of scoping.
Uses simple, clear language and avoids or explains technical terms.	The Environmental Report has been written in plain English as far as the technical nature of the report allows.
Uses maps and other illustrations where appropriate.	Figures and tables have been used throughout the SEA Report and in Appendix E where appropriate.
Explains the methodology used.	This is presented in Section 3 .
Explains who was consulted and what methods of consultation were used.	This is covered in Section 1.5 .
Identifies sources of information, including expert judgement and matters of opinion.	References to information sources are provided throughout the report and Appendix E where appropriate.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	An NTS is provided as a stand alone document to the Environmental Report.

Consultation

The SEA is consulted on as an integral part of the plan-making process.	<p>The completed previous Environmental Reports were sent to the Consultation Bodies in England and the equivalent bodies in the devolved administrations and simultaneously published for public consultation on 20 October 2011. The consultation period ended on 20 January 2012. As the Environmental Reports dealt with the effects of the revocation and not the adoption of plans, there were no draft plans to consult on.</p> <p>This Environmental Report will be published for consultation in summer 2012.</p>
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate timeframes to express their opinions on the draft plan and Environmental Report.	<p>The completed Environmental Reports were sent to the Consultation Bodies in England and the equivalent bodies in the devolved administrations and simultaneously published for public consultation on 20 October 2011.</p> <p>This Environmental Report will be published for consultation in summer 2012.</p>

Decision-making and Information on the Decision

The Environmental Report and the opinions of those consulted are taken into account in finalising and adopting the plan or	This will be included in the Post Adoption Statement (to be issued following consultation).
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programme.	
An explanation is given of how they have been taken into account.	This will be included in the Post Adoption Statement (to be issued following consultation).
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	This will be included in the Post Adoption Statement (to be issued following consultation).
Monitoring Measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	These are presented in Section 5.2 .
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	Details of this are provided in Section 5.2 .
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect).	Details of this are provided in Section 5.2 .
Proposals are made for action in response to significant adverse effects.	This will be set out in the Post Adoption Statement (to be published following consultation).

5.4 Next Steps

This Environmental Report will be presented for consultation until 26 November 2012. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the regional strategies.

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