



Department for  
Communities and  
Local Government

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

Post Adoption Statement

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Any enquiries regarding this document/publication should be sent to us at:

Department for Communities and Local Government  
Eland House  
Bressenden Place  
London  
SW1E 5DU  
Telephone: 030 3444 0000

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## **Summary of Key Facts**

<b>Name of Responsible authority:</b>	Department for Communities and Local Government
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<b>Date of revocation:</b>	22 <sup>nd</sup> February 2013
<b>Address where documents can be consulted:</b>	Eland House, Bressenden Place London SW1E 5DU

# Contents

<b>Summary of Key Facts .....</b>	<b>1</b>
<b>Contents .....</b>	<b>2</b>
<b>Preface.....</b>	<b>3</b>
<b>1. Introduction .....</b>	<b>4</b>
<b>1.1 Regional Strategies.....</b>	<b>4</b>
<b>1.2 The Plan to Revoke the Yorkshire and Humber Regional Strategy .</b>	<b>5</b>
<b>1.3 Applying Strategic Environmental Assessment to the Revocation     of the Regional Strategies .....</b>	<b>8</b>
<b>1.4 Purpose of the Post Adoption Statement.....</b>	<b>9</b>
<b>2. How environmental considerations have been integrated into the plan .....</b>	<b>10</b>
<b>2.1 Environmental Considerations in the Plan to Revoke the Yorkshire     and Humber Regional Strategy.....</b>	<b>10</b>
<b>2.2 Environmental Considerations in the Strategic Environmental     Assessment .....</b>	<b>11</b>
<b>3. How the Environmental Reports have been taken into account.....</b>	<b>15</b>
<b>4. How consultation on the Environmental Reports has been taken into account .....</b>	<b>31</b>
<b>4.1 Overview .....</b>	<b>31</b>
<b>4.2 Scoping Consultation .....</b>	<b>31</b>
<b>4.3 Public Consultation on the Initial Environmental Report .....</b>	<b>32</b>
<b>4.4 The Updated Environmental Report .....</b>	<b>36</b>
<b>5. Reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.....</b>	<b>49</b>
<b>5.1 Policy Background.....</b>	<b>49</b>
<b>5.2 The Reasonable Alternatives .....</b>	<b>51</b>
<b>5.3 The Reasons for Choosing the Plan to Revoke the Yorkshire and     Humber Regional Strategy in light of the other Reasonable     Alternatives dealt with .....</b>	<b>52</b>
<b>6. The measures decided concerning monitoring .....</b>	<b>58</b>
<b>ANNEX A - Consultation and Partner Engagement – Initial Environmental Report .....</b>	<b>59</b>
<b>ANNEX B - Consultation and Partner Engagement – Updated Environmental Report .....</b>	<b>140</b>
<b>ANNEX C – Monitoring Indicators .....</b>	<b>189</b>

# Preface

This document is the Post Adoption Statement for the plan to revoke the Regional Strategy for Yorkshire and Humber (“the Plan to Revoke”). The Post Adoption Statement is a requirement<sup>1</sup> of the Strategic Environmental Assessment process to which the Plan to Revoke has been subject. Strategic Environmental Assessment is an assessment process that supports decision making by identifying, characterising and evaluating the likely significant effects of a plan or programme on the environment and determining how any adverse effects may be mitigated or where any beneficial effects may be enhanced.

The Regional Strategy for Yorkshire and Humber comprises the regional spatial strategy for the region (published by the Secretary of State in May 2008 as the Yorkshire and Humber Plan Regional Spatial Strategy to 2026) and the regional economic strategy for the region (published by Yorkshire Forward in 2006 as the Regional Economic Strategy for Yorkshire & Humber 2006-2015).

The Post Adoption Statement sets out information about the plan as adopted, which is the Plan to Revoke the Regional Strategy for Yorkshire and Humber with modifications to retain certain policies which relate to the Green Belt around the City of York (“the York Green Belt Policies”).

The Post Adoption Statement is being published in parallel with the laying of The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013 (S.I. 2013/117), which will come into force on 22 February 2013.

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

# Chapter 1

## Introduction

### 1.1 Regional Strategies

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

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

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

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

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

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

On revocation of the Yorkshire and Humber 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 Planning and Compulsory Purchase Act 2004, inserted by the Localism Act.

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

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

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

## 1.2 The Plan to Revoke the Yorkshire and Humber Regional Strategy

The Yorkshire and Humber Regional Strategy combines the regional spatial strategy for the region and the regional economic strategy for the region. .

The regional spatial strategy (published as the Yorkshire and Humber Plan Regional Spatial Strategy to 2026 in May 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 seeks 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 provide an increased focus on needs and opportunities. It 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 per annum over the period 2008 to 2026.

The regional economic strategy (published as the Regional Economic Strategy for Yorkshire and Humber 2006-2015 in 2006), was produced by Yorkshire Forward, the Yorkshire and Humber Regional Development Agency, in compliance with Section 7 of the Regional Development Agencies Act 1998. It 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 Strategy 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.

Revocation of the Yorkshire and Humber Regional Strategy would leave the statutory development plan as comprising of any saved local plan policies and adopted development plan documents. Approximately one third the 23 local planning authorities in Yorkshire and Humber have adopted development plan documents under the Planning and Compulsory Purchase Act 2004. The remaining 15 local planning authorities in Yorkshire and Humber, who were yet to adopt a development plan document under the Planning and Compulsory Purchase Act 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990. These authorities are more likely to be affected by the revocation of the Regional Strategy as some, if not all, will need to review and update their local plan to reflect National Planning Policy Framework policies and the objectively assessed needs of the local community.

Once the regional strategy is revoked, or partially revoked, local councils should, in line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, and in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, approve

development that accords with the local plan unless material considerations indicate otherwise. Where that plan is out of date, councils must, unless material considerations indicate otherwise, grant planning permission for development that is sustainable without delay. Out of date local plans will leave councils vulnerable to speculative development; the Government is encouraging local councils to put in place local plans as soon as possible. If any of the regional strategy policies are saved (see Chapter 5 of this Post Adoption Statement) these policies would continue to form part of the local development plan for relevant local authorities.

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

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

- The **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.
- 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.
- The **Humberhead Levels Partnership** was established in 2001. The Humberhead Levels 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 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; and Barnsley, Doncaster and Rotherham Councils.

In addition, there are non-statutory Local Enterprise Partnerships (of which there are four in the region). The combination of long standing and more

recent formal and informal measures will ensure that strategic planning continues to operate effectively in the absence of the Regional Strategies.

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

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

As part of its stated commitment to protecting the environment, the Government initially carried out environmental assessments of the revocation of the Regional Strategies. These initial assessments were undertaken to be compliant with the procedure set out in the Strategic Environmental Assessment Directive (2001/42/EC). A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework and a planning policy on Travellers sites, and has commenced the duty to co-operate provided for in the Localism Act. In addition, in a judgement by the Court of Justice of the European Union,<sup>2</sup> the Court held that ‘...in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment’. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent case law, to update and build on the assessments which were described in the previous Environmental Reports.

AMEC Environment and Infrastructure Ltd were commissioned to carry out the further assessment and to prepare updated Environmental Reports. A public consultation exercise undertaken on the updated Environmental Report for Yorkshire and the Humber ran from 28 September 2012 until 26 November 2012. Updating of, and consultation on, the Environmental Reports for the other seven regions has been staggered. The Yorkshire and Humber Regional Strategy is the second of the eight to have completed consultation on the Environmental Report. This has enabled the Secretary of State to understand the environmental effects of revoking the Regional Strategy and reasonable alternatives to revocation, including partial revocation, to consider

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<sup>2</sup> The judgment in Case C-567/10 Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale.

the views of the statutory bodies and the public who responded to two public consultations.

In accordance with Article 8 of the Strategic Environmental Assessment Directive, the Government has taken into account findings of the two Environmental Reports (on the revocation of the Regional Strategy and the reasonable alternatives assessed as part of that process) and the consultation responses to those reports in coming to its decision to partially revoke the Regional Strategy.

## 1.4 Purpose of the Post Adoption Statement

Article 9 of the Strategic Environmental Assessment Directive requires that when a plan or programme is adopted (in this case, the Plan to Revoke the Regional Strategy, modified to retain the York Green Belt Policies as set out in Chapter 5), the consultation bodies, the public and any other Member States consulted on the Environmental Report are informed and the following specific information is made available:

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

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

# Chapter 2

## **How environmental considerations have been integrated into the plan**

### 2.1 Environmental Considerations in the Plan to Revoke the Yorkshire and Humber Regional Strategy

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

During its development, the National Planning Policy Framework was also subject to consultation, with many of the responses focusing on aspects of environmental protection and enhancement.

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

The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan

led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues.

## 2.2 Environmental Considerations in the Strategic Environmental Assessment

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

- The decline of the region's biodiversity resource in the last four decades of the 20th century has been more severe than that experienced nationally with current pressures relating to increased housing development, recreation and tourism. There have been limited signs of recovery recently (e.g. salmon returning to the River Aire and Yorkshire Ouse and 97.7% of Sites of Special Scientific Interest are in favourable or unfavourable but recovering condition). However, climate change presents a further set of challenges, such as the need to address the loss of upland habitats, wetlands, isolated habitats and coastal habitats.
- Between 2008 and 2033, the population of Yorkshire and Humber is expected to increase from 5,217,500 to 6,296,000. Housing growth along with the limited availability of brownfield resource in some local authorities will necessitate the release of greenfield sites for development. Over two thirds of the population live in West or South Yorkshire with the majority of people living in the cities of Leeds, Sheffield and Bradford. Each area has its own issues and opportunities. The largest concentrations of deprived areas in the region are within the urban areas of Hull, Bradford, Doncaster, Sheffield and Barnsley and, in addition to an ageing population, trends suggest a future with more ill health.
- 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.
- Livestock farming in the uplands and arable farming in the lowlands have long been the dominant land uses in Yorkshire and the Humber. About 10 per cent of the region is covered by excellent or very good quality agricultural land, in the east of the region this best and most versatile agricultural land is under pressure from increased housing

development. In urban areas there is a legacy of contaminated land from past industrial activities which requires remediation.

- In Yorkshire and Humber there is currently sufficient water to meet needs and protect the environment, but water resources are under pressure as a result of population growth and climate change. 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.
- On average the current trend is for improving air quality in the region. 15 local authorities in Yorkshire and Humber have designated Air Quality Management Areas predominantly situated around motorways and A roads.
- Growth of housing, increased transport movement, waste generation and energy use would also contribute to an increase in carbon dioxide emissions of 8.7 million tonnes per year between 2008 and 2026 based on current resource use.
- 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.
- 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, with local authorities in the region recycling 37% of household waste during the 2009/10 period with a target of 50% by 2021. There are over 100 sites producing primary aggregate in Yorkshire and Humber region, it is expected the production of minerals from the National Parks will gradually reduce over time.
- 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. 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.
- 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. Pressure on the landscape includes change to agricultural practices (e.g. intensification of farming), the impact of built development, roads and services infrastructure, and other human activity such as recreation. 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.

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

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

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

All the environmental topics listed in the Strategic Environmental Assessment Directive and the Environmental Assessment of Plans and Programmes Regulations 2004 were found to be relevant for the assessment of the revocation plan.

In line with the requirements of the Directive and Regulations and the guidance in the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the Strategic Environmental Assessment Directive, the assessment process predicted the significant environmental effects of the Plan to Revoke the Yorkshire and Humber Regional Strategy against all of the topic areas listed in **Table 2.1**. This was done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative).

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

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

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

Both Environmental Reports (issued in October 2011 and in September 2012) documented the findings of the assessment, outlining where any likely significant effects were identified and proposing, where appropriate, mitigation measures. These findings have then been taken into account during the preparation of the Plan to Revoke and before the final decision was taken to adopt the Plan, with modifications to retain certain policies which relate to the Green Belt around the City of York (“the York Green Belt Policies”).

# Chapter 3

## How the Environmental Reports have been taken into account

The Environmental Reports and Plan to Revoke the Yorkshire and Humber Regional Strategy have developed in tandem. **Table 3.1** details key stages of the Strategic Environmental Assessment and its relationship with the development of the Plan to Revoke the Regional Strategy.

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

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

<b>Strategic Environmental Assessment</b>	<b>Plan to Revoke</b>	<b>Relationship</b>
adopted resulting in assumptions over the final contents of the National Planning Policy Framework and its influence.	updated Environmental Report takes account of the policies set out in the Framework.	documented in the updated Environmental Report (published in September 2012).
Initial assessment of the impact of the duty to co-operate took place prior to the commencement of the new duty and required outline of assumptions with regard to operation.	The provisions which create a new duty to co-operate were commenced when the Localism Act received Royal Assent on the 15th November 2011. They require local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.	Commencement of the duty to co-operate provided greater certainty to the assessment, reflected in updated assessment, documented in the updated Environmental Report (published in September 2012).
Assessment considered the effects of revocation on local planning authorities and provided analysis of local plans highlighting where plans were out of date or silent on key planning policy matters.	The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'.	The Strategic Environmental Assessment provided up to date summary of current position on the adoption and status of local plans, with indication of the number of authorities who needed to take action within each region regarding the revision and update of local plan policies.
<b>Reporting</b>		
The key findings of the Environmental Report are presented along with the Government's responses in Table 3.2 below. The extent to which the findings have informed the plan as adopted is detailed in Chapter 5 of this Post Adoption Statement.		
<b>Consultation</b>		

Strategic Environmental Assessment	Plan to Revoke	Relationship
<p>The consultation responses to the consultation on the initial and updated Environmental Reports are presented along with the Government's responses in Tables 4.1 and 4.2 in Chapter 4. The extent to which the consultation has informed the plan as adopted is detailed in Chapter 5 of this Post Adoption Statement.</p>		
Monitoring		
Proposals for monitoring	<p>Section 5 'Put Communities in charge of planning' of the Department for Communities and Local Government business plan 2012 – 2015 includes specific monitoring actions for the Department regarding the local plan making progress by authorities and on compliance with the duty to co-operate.</p>	<p>The Department for Communities and Local Government is able to jointly meet requirements for monitoring environmental effects of the implementation of the Plan to Revoke with business plan commitments and by undertaking periodic review of data for specific monitoring information.</p>

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

**Table 3.2 Key findings of the Environmental Report**

No	Key Environmental Report findings	Response
1.	<p>Significant positive environmental effects, similar to those if the Regional Strategy were retained, will occur from revocation of the Yorkshire and Humber Regional Strategy in the long term on all elements of the environment.</p>	<p>The Government notes the findings of the updated Environmental Report and considers that the Plan to Revoke is largely positive in its effect although it is acknowledged that these effects are largely similar to those of retention.</p>

No	Key Environmental Report findings	Response
2.	<p>Negative effects, similar to those if the Regional Strategy were retained, will occur from revocation of the Yorkshire and Humber Regional Strategy in the short-long term in respect of impacts on all elements of the environment due to the amount of housing and employment development and the expansion of freight and airport facilities in the region.</p>	<p>The Government notes the findings of the updated Environmental Report and that similar negative impacts on the environment due to retention or revocation of the Yorkshire and Humber Regional Strategy could occur due to development pressure created by growth. The Government considers that these potentially negative impacts on the environment can be positively addressed by authorities, including local planning authorities, working collaboratively through the duty to co-operate within the policy context set by the National Planning Policy Framework.</p>
3.	<p>In the case of revocation, there may be more uncertainty about the nature and scale of positive and negative impacts on the Strategic Environmental Assessment topics in the short and medium term. This is due to the transition period for those local authorities whose local plans do not reflect the objectively assessed and up to date needs of their local community or who need to define and agree areas of cooperation and reflect strategic policies in their adopted Local Plans.</p>	<p>The Government notes the findings of the updated Environmental Report on the progress of plan-making in Yorkshire and Humber. In noting the findings of the updated Environmental Report, the Government considers uncertainty of impacts until plans are in place are mitigated by measures outside the Plan to Revoke.</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five-year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision maker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption in favour of sustainable development is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking. From the end of March 2013 transitional arrangements on the implementation of the National Planning Policy Framework will</p>

No	Key Environmental Report findings	Response
		<p>cease to apply. From April 2013, in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p> <p>Delivery of local plans is increasing: 35% of local planning authorities across the Yorkshire and Humber region now have a post 2004 local plan adopted, and overall 68% of local planning authorities in England now have a published local plan.</p> <p>There is a package of advice and support being offered to all councils, from the Local Government Association, the Planning Inspectorate and the Department, to support councils to get Local Plans updated or in place. The Planning Inspectorate is working in particular with local authorities with published plans about to be examined, and the Local Government Association's Planning Advisory Service is offering support to councils working towards plan publication. The Inspectorate continues to work quickly to examine plans already submitted, and the focus now is on maintaining a strong pipeline of plans coming through for examination.</p> <p>Furthermore, the Government has already introduced, or is introducing, a range of measures to make the planning system work more effectively and efficiently. These measures are designed to create the conditions that support local economic growth, increase building and remove barriers that stop local businesses creating jobs. Specific measures build on the measures in the Localism Act and the introduction of the National Planning Policy Framework and include:</p> <ul style="list-style-type: none"> <li>- proposals to extend permitted development rights for a trial period of 3 years;</li> </ul>

No	Key Environmental Report findings	Response
		<ul style="list-style-type: none"> <li>- instructing the Planning Inspectorate to respond quickly to all major economic and housing-related appeals;</li> <li>- proposals to speed up the process for determining planning appeals;</li> <li>- giving developers extra time to get their sites up and running before planning permission expires; and</li> <li>- through the Growth and Infrastructure Bill, giving new powers to the Planning Inspectorate to take over the role of making planning decisions in an area if the local authority has a record of consistently slow or poor quality decisions.</li> </ul> <p>In conclusion, the Government considers that any uncertainty of impacts until local plans are in place are mitigated by measures outside the Plan to Revoke the Yorkshire and Humber Regional Strategy.</p> <p>Implementation of the Plan to Revoke, modified to retain the York Green Belt Policies, will remove any uncertainty about the regional policy framework and the status of the Regional Strategy and potential uncertainties and delays to Local Plan-making.</p>
4.	<p>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. 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 on the</p>	<p>The City of York is not covered by an adopted local plan. Consequently the regional strategy is the only part of the development plan for York that confirms the existence of a Green Belt, and it includes policy requiring detailed boundaries to be defined in the local plan. Revocation would in effect remove the Green Belt protection, because there is a legal requirement to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.</p> <p>York is one of a handful of settlements in England which has a Green Belt whose primary purpose is to preserve the setting</p>

No	Key Environmental Report findings	Response
	<p>Green Belt to have a significant negative effect on the special character and setting of York.</p>	<p>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).</p> <p>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, first sentence of Policy YH9 Part C and Policy Y1 Parts C1, C2 and parts of the Key Diagram which illustrate the general extent of the Green Belt around York and the indicative boundary of the inner Green Belt around the conurbation of York 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.</p> <p>The updated Environmental Report concludes that there would be a risk during the period between revocation and the City Council adopting a local plan of development being approved on land that would otherwise be in the York Green Belt - with potentially cumulative significant adverse impacts on the special character and setting of the historic city.</p> <p>In light of the findings of the updated Environmental Report and the consultation responses the Government has decided to retain certain policies in the Yorkshire and Humber Plan which relate to the Green Belt around the City of York ("the York Green Belt Policies"). These are: the title and first</p>

No	Key Environmental Report findings	Response
		<p>sentence of part C of policy YH9: Green belts, the title, opening line and parts C1 and C2 of policy Y1: York Sub-Area Policy and parts of the Key Diagram which illustrate the general extent of the Green belt around York and the indicative boundary of the inner Green belt around the conurbation of York. The reasoning for this is set out in more detail in Chapter 5 of this Post Adoption Statement.</p>
5.	<p>In the case of revocation, there is uncertainty about the potential benefits relating to spatial planning issues that extend beyond local authority boundaries coming forward, particularly in the short to medium term, since local authorities need to define and agree areas of cooperation and reflect strategic policies in their adopted Local Plans.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that the uncertain nature of the effects are mitigated by measures outside the Plan to Revoke.</p> <p>The statutory duty to co-operate requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues, including those set out in paragraph 156 of the National Planning Policy Framework (homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure such as green infrastructure and for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including</p>

No	Key Environmental Report findings	Response
		<p>landscape) and taking account of paragraph 160 which states that local planning authorities should have a clear understanding of business needs and economic markets operating in and across their local areas. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the duty to co-operate in preparing the development plan.</p>
6.	<p>The duty to co-operate could well address a wide range of strategic issues for example green infrastructure, but 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, could be ignored or their potential not realised.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the plan to revoke.</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty to co-operate requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The National Planning Policy Framework makes clear cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156. These matters include climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape features. The duty to co-operate not only means that authorities are required to work collaboratively when developing their Local Plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>The National Planning Policy Framework sets out a set of core land use planning principles which should underpin both plan-making and decision taking, including</p>

No	Key Environmental Report findings	Response
		<p>encouraging the use of renewable resources. To be found sound, Local Plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework's policies and the statutory duty to co-operate. These include the requirements for local authorities to have a positive strategy to promote energy from renewable sources; design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily; approve applications for renewable energy if the impacts are (or can be made acceptable); and co-operate to deliver strategic outcomes which include mitigating climate change. The National Planning Policy Framework's proactive, plan-led approach sits within a wider set of requirements and policy initiatives to deliver renewable energy. These include the UK's legally binding target that by 2020 15% of energy should come from renewable energy. Additionally, there is a specific duty on local planning authorities to ensure their local plan includes policies designed to mitigate climate change. The National Planning Policy Framework also makes clear that, to minimise impacts on biodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority boundaries.</p> <p>Existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Floods and Water Management Act 2010 – which includes a duty to co-operate) remains. Local Planning Authorities are required by the National Planning Policy Framework to undertake a Strategic Flood Risk Assessment, preferably at a catchments level through joint co-operation.</p> <p>Six Energy National Policy Statements (including one on nationally significant renewable energy infrastructure) set out the need for certain infrastructure and policies</p>

No	Key Environmental Report findings	Response
		<p>against which applications for development consent for energy projects will be considered. These documents include the requirements for applicants to address economic, social and environmental impacts of a scheme; they also enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted.</p> <p>Existing policy arrangements are also in place on a number of issues, for example a number of waste authorities are working together to plan strategically for waste management.</p> <p>Nature Improvement Areas provide cross-boundary projects where partners work to improve biodiversity and can also be expected to contribute significantly to landscape conservation. There are two Nature Improvement Areas located in Yorkshire and Humber: the Dearne Valley Green Heart and the Humberhead Levels.</p> <p>Reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live is part of the Government's broader approach set out in, for example, 'Enabling the transition to a green economy', and the Government's 'Biodiversity 2020' strategy. Strategic partnerships, including Local Nature Partnerships, Climate Local, and the new arrangements for Lead Local Flood Authorities, are examples of how co-operation is already a key part of the wider framework addressing the issues raised.</p>
7.	<p>In respect of setting local housing targets, over the medium and longer term, the wider effects of revocation could yield increasing differences between regions with growth concentrated in those areas of greatest demand with</p>	<p>The Government notes the finding of the updated Environmental Report.</p> <p>When local planning authorities prepare the housing numbers to go into their local plans they will do so within the planning policy context set out in Paragraph 47 of the National Planning Policy Framework which asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and</p>

No	Key Environmental Report findings	Response
	<p>consequential effects for infrastructure and environmental assets, for example, the effects of land take and disturbance on biodiversity and increased demand for travel and water resources.</p> <p>In the long term, revocation could increase the number of net additional homes delivered by up to about 30,000 per annum to 2026. 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.</p>	<p>affordable housing in the housing market area, as far as is consistent with policies set out in the National Planning Policy Framework. They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross-administrative boundaries. Housing numbers set out in local plans will have been subject along with the rest of the content of the local plan to the Sustainability Appraisal and a Strategic Environmental Assessment. The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. These matters include homes, infrastructure to support growth, climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape features. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty to co-operate requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The duty to co-operate not only means that authorities are required to work collaboratively when developing their</p>

No	Key Environmental Report findings	Response
		<p>Local Plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>Local planning authorities are expected to work collaboratively through the duty to co-operate to set their local housing numbers and consider how to mitigate the potential impact of growth on infrastructure and their environmental assets.</p> <p>The figure of a net additional 30,000 homes per annum to 2026 does not come from the Yorkshire and Humber Regional Spatial Strategy (May 2008), but from a planned revision to the regional strategy which had reached the publication of the Project Plan stage in November 2009. In the absence of the regional strategy local authorities will not have to draft their local plans to be in general conformity with the regional strategy. But they may wish to draw upon the evidence base which informed the then regional assembly's figure of additional 30,000 homes per annum to 2026, which was informed by data provided by the former National Housing and Planning Unit.</p>
8.	<p>Local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the housing and regeneration needs of their areas.</p> <p>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-</p>	<p>The Government notes the finding of the updated Environmental Report and judgements made on the potential wider effects. The Government have introduced broader policy measures outside of the Plan to Revoke, for example, the New Homes Bonus is designed to ensure that communities which are growing can mitigate the strain of increased housing and respond to community ambitions, for example by providing local services, unlocking infrastructure and community facilities. This is in the context of broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>Regional Strategies set housing targets on</p>

No	Key Environmental Report findings	Response
	<p>operating authorities. This may create greater socio-economic disparities, reflected in the Strategic Environmental Assessment as effects on the population and health topics, which are difficult to reconcile without significant intervention.</p>	<p>the basis that these would be incorporated into plans by local authorities, and that the market would deliver them.</p> <p>The National Planning Policy Framework instead asks authorities to use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (such as the protections on Green Belt, high grade agricultural land, Areas of Outstanding Natural Beauty etc.). They should prepare Strategic Housing Market Assessment to assess this need, working with neighbouring authorities where housing market areas cross-administrative boundaries.</p> <p>They should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The practice guidance on Strategic Housing Land Availability Assessment states that the study area should preferably be a sub regional housing market area, but may be a local planning authority area, where necessary.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which includes strategic policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>The Government continues to monitor housing supply across England at local authority level.</p> <p>Wider policy is in place, in addition to the</p>

No	Key Environmental Report findings	Response
		<p>National Planning Policy Framework, which directs significant development towards the most sustainable locations. For example, developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure than the system of planning obligations where lengthy negotiations often create severe delays.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources, such as:</p> <ul style="list-style-type: none"> <li>- existing legislation concerning environmental protection (such as the European Habitats Directive (92/43/EEC), Conservation (Natural Habitats) Regulations 1994, Water Framework Directive (2000/60/EC), The Water Directive (Water Framework Directive) (England and Wales) Regulations 2003, the Flood and Water Management Act 2010);</li> <li>- existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 and 11, and Planning Policy Statement 10: Waste Management);</li> <li>- other government policy (such as that articulated in the Natural Environment White Paper); and</li> <li>- actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003</li> </ul>

No	Key Environmental Report findings	Response
		concerning water resource management planning.
9.	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 (with differential effects on the SEA topics population and human health in regions arising from the differing viability of (affordable) housing, employment opportunities and transport infrastructure) and reliance on other policy instruments for their resolution.	<p>The Government notes the findings of the updated Environmental Report. The Government considers that there are other, broader drivers of spatial change. For instance, there are four Local Enterprise Partnerships in Yorkshire and Humber whose remit is to drive growth across their area making the most of its inherent strengths. These cover: York and North Yorkshire; Sheffield City Region; Leeds City Region; and Humber.</p> <p>We note the judgement that there could be a reliance on other policy instruments. The Local Growth White Paper 2010, "Realising Every Place's Potential" established the Government's position on regional economic circumstances and set the framework for the ongoing activity of Local Enterprise Partnerships and investments such as the Growing Places Fund and the Regional Growth Fund.</p>

# Chapter 4

## **How consultation on the Environmental Reports has been taken into account**

### 4.1 Overview

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

Detailed responses to the initial Environmental Report on the revocation of the Yorkshire and Humber Regional Strategy, published in October 2011, were provided by consultees and summarised in the updated Environmental Report, published in September 2012.

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

### 4.2 Scoping Consultation

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

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

**Annex A** provides more detailed information on the responses to the scoping consultation and the Government response (which has been updated for inclusion in this Post Adoption Statement).

## 4.3 Public Consultation on the Initial Environmental Report

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

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the Environmental Reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government Strategic Environmental Assessment Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). Seven responses dealt specifically with the Environmental Report for the Yorkshire and Humber - only one response was received from a local planning authority within the Yorkshire and Humber. A further 72 dealt solely with Environmental Reports for regions other than the Yorkshire and Humber. A summary of the 31 consultation responses relevant to the Yorkshire and Humber Environmental Report is set out at Appendix F of the updated Environmental Report.

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

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

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The overall approach taken to	The Environment Agency supported the broad approach to the analysis presented in the	Chapter 1 of the updated Environmental Report set out how it met the

<b>Issue</b>	<b>Summary of consultation responses to the October 2011 Environmental Report</b>	<b>Response</b>
Strategic Environmental Assessment	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.	requirements of the SEA Directive. The impacts of revoking, retaining or partially revoking the Regional Strategy for Yorkshire and the Humber were assessed in detail in the short, medium and long term against the 12 SEA topics. This included 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 updated Environmental Report updated the baseline evidence and provided 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 were proposed where significant impacts were predicted. Arrangements for monitoring possible effects were set out and a non-technical summary was provided.

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
Reliance on the National Planning Policy Framework	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the updated Environmental Report took account of 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

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
		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 allocations, heritage, waste management, biodiversity, renewable energy, transport, water, Brownfield land, the coast, flooding, trees and woodland, green infrastructure, landscape,	The updated Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised by consultees. Individual policies for the planning of individual topics are described in the updated Environmental Report, drawing on the policies set out in the NPPF.

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

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 Strategic Environmental Assessment Directive Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the Plan to Revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.

- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the Strategic Environmental Assessment Directive 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.

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

## 4.4 The Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the Yorkshire and Humber Regional Strategy ran from 28 September 2012 until 26 November 2012.

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

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for 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.

In addition, the Government stated that they wanted to consider carefully the adverse impacts on the York Green Belt identified in the updated Environmental Report; and would welcome views on these aspects, any suggestions for mitigation and in particular on the reasonable alternative of retaining the York Green Belt policies until York City Council have adopted a local plan which give effect to these policies

In total 26 written responses were received summarised by interest group:

- Six Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- Six Local planning authorities (North Yorkshire County Councils, Rotherham Metropolitan Borough Council, North Yorks Moors and Yorkshire Dales National Parks, Hull City Council, City of York Council);
- Three Parish Councils (Fulford Parish Council, Strensall with Towthorpe Parish Council, Yorkshire Local Councils Association);
- Five NGOs and local pressure groups (Friends of the Earth, The Theatres Trust, The Wildlife Trusts Yorkshire and Sheffield & Rotherham, Town and Country Planning Association, Heslington Village Trust);
- Two industry representative (EdF Energy and Renewables UK);
- Two developers and planning consultants (Jennifer Hubbard (Planning Consultants), Persimmon Homes); and
- Two individuals and MPs (Richard Frost, Julian Sturdy MP for York Outer).

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



Issue	Summary of consultation responses to the updated Environmental Report	Response
<b>Additional information</b>	<b>North Yorkshire County Council</b> noted the baseline evidence underpinning the environmental assessment did not have direct regard to the North Yorkshire Minerals Local Plan Saved Policies (2008) and Waste Local Plan Saved Policies (2009).	These documents were considered in the assessment. They are listed in Appendix C and in Appendix E on page 222 of the updated Environmental Report under additional considerations. It is acknowledged that North Yorkshire County Council have two Local Plans in place which deal with Minerals and Waste.
<b>Likely significant effects</b>	<b>Natural England</b> considered that there will be a delay between adoption of National Planning Policy Framework compliant local plans and the revocation of the regional strategy. An additional 30,000 homes per annum are projected to be built in Yorkshire and Humber. Many of the determinations of individual planning applications (that collectively go to make up the additional dwellings approved in the region) could be made before adopted local plans are put in place.	The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 3.2 of this Post Adoption Statement) regarding issues of uncertainty and delay. In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the Plan to Revoke, such as those contained in the Localism Act 2011, those proposed in the Growth and Infrastructure Bill and the package of advice and support being offered to all councils, from the Local Government Association, the Planning Inspectorate and the Department. duty to co-operate
<b>Reasonable alternatives</b>	The <b>Environment Agency</b> agreed with the overall approach taken to appraise options, including	The Government welcomes the comments that suitable alternatives have been identified and that the

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>the wider range of alternatives.</p> <p><b>Hull City Council</b> noted the remaining options give suitable alternatives to the immediate and wholesale revocation of the regional strategy as originally proposed.</p> <p><b>North Yorkshire County Council</b> consider that the updated report has been undertaken broadly in line with the legislative requirements, although they would have welcomed the presentation of more detailed information on mitigation measures for each reasonable alternative considered in the body of the updated Environmental Report in preference to its presentation in Appendix D and E.</p>	<p>environmental assessment has been undertaken in line with the legislative requirements. The Government notes the comments on presentation though considers that this does not affect the conclusions of the assessment.</p>
<b>Monitoring</b>	<p>The <b>Environment Agency</b> and <b>Town and Country Planning Association</b> welcomed the monitoring recommendations in the updated Environmental Report.</p> <p>The <b>Environment Agency</b> recommend closer monitoring of highly complex, cumulative effects on issues such as climate change, water quality and water</p>	<p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan to revoke the Yorkshire and Humber Regional Strategy are contained in Chapter 6 and Annex C of this Post Adoption Statement.</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>resources.</p> <p>The <b>Town and County Planning Association</b> and <b>Friends of the Earth</b> queried or made suggestions for how monitoring should be undertaken and published.</p> <p>English Heritage supported the use of the Heritage at Risk data.</p>	
<p><b>Reliance on the duty to co-operate</b></p>	<p><b>Rotherham Metropolitan Borough Council</b> have actively sought to meet the duty to co-operate.</p> <p><b>Natural England, the Environment Agency, English Heritage and North Yorkshire Council</b> recognise the duty to co-operate and consider cross boundary working essential to tackle strategic issues such as those related to biodiversity, water resources and heritage assets.</p> <p><b>Natural England, the Wildlife Trusts and Yorkshire and Sheffield &amp; Rotherham and RenewableUK</b> would welcome further guidance to encourage local planning authorities to implement the duty to co-operate and take part in cross boundary partnerships.</p>	<p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Review Group led by Lord Taylor has considered the need for guidance across the board, including on the implementation of the duty to co-operate. Recommendation 18 identifies this as one of the priority areas on which the Government should consider providing guidance.</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>Friends of the Earth</b>, the <b>Town and Country Planning Association</b> and the <b>Wildlife Trusts for Yorkshire and Sheffield &amp; Rotherham</b> expressed concern about spatial policies being revoked given the lack of certainty surrounding the duty to co-operate in relation to strategic planning across administrative boundaries. Where cooperation rather than agreement is a key part of the mitigation of the impacts of revocation of the regional strategy, it is questionable as to whether the mitigation is entirely realistic.</p> <p>The <b>Environment Agency</b> welcomed that the updated Environmental Report recognised that achieving environmental outcomes may be more challenging during the transitional period, between the revocation of the regional strategy and local planning authorities getting adopted local plans in place.</p>	<p>The Government has provided a response to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement, including the finding that issues, such as, renewable energy, biodiversity enhancement and landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p> <p>The assessment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the Yorkshire and Humber Regional Strategy.</p>
<b>Pre-determination</b>	<p><b>Friends of the Earth</b> considered it unclear how the issues raised will be addressed when the outcome seems to have already been set.</p>	<p>The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>approach and has maintained an open mind. The Government has also demonstrated that it is open to considering changes to the plan to revoke, for instance through the retention of policies where the assessment concludes that revocation could lead to significant environmental effects.</p>
<p><b>Individual Topics</b></p>	<p>Comments were made in relation to a number of the individual topics including Habitats Regulations Assessment, minerals and waste management, flood risk, water management and water efficiency, biodiversity, York Green Belt, transitional arrangement, housing numbers, Green Infrastructure, National Parks, renewable energy generation and climate change.</p> <p><b>North York Moors National Park Authority and Yorkshire Dales National Park Authority</b> requested that Part C3 of Policy ENV4 (Minerals) should be retained because it seeks a progressive reduction in aggregate production from National Parks and Areas of Outstanding Natural Beauty.</p> <p><b>North Yorkshire County Council</b> stated that</p>	<p>The Managed Aggregates Supply System is in place to address the issue of apportionment by local authorities. The issue of reducing aggregates production in certain locations is one which local planning authorities, including National Park Authorities, can seek to address through their local plans, having regard to policies in the National Planning Policy Framework, strategic planning</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>retention of the entire regional strategy would allow uncertainty around minerals apportionment to be addressed and local plans to be brought forward with policies to promote Green Infrastructure in line with Policy YH8.</p> <p><b>Hull City Council</b> believes that YH1, YH4, HE1 and the non-spatial policies should be saved until local plans are in place.</p> <p><b>English Heritage, City of York Council</b> and a number of other consultees supported the reasonable alternative to retain policies that provide a statutory basis for the York Green Belt. Two consultees made the case for revoking the whole of the Yorkshire and Humber Regional Strategy including policies that define the York Green Belt.</p>	<p>requirements including the duty to co-operate, and the statutory duty on planning authorities under section 62 of the Environment Act 1995.</p> <p>The Government does not believe that retaining either the entire regional strategy or Policies YH1 (Overall Approach and Key Spatial Priorities), YH4 (Regional Cities and Sub Regional Cities and Towns) HE1 (Humber Estuary sub area policy) and the non spatial policies of the Yorkshire and Humber Plan is necessary because the duty to co-operate has been in place since March 2012 and is underpinned by the National Planning Policy Framework.</p> <p>The Government notes the eight representations received requesting that Part C1 and C2 of Policy Y1: York sub area policy and Part C of Policy YH9 Green Belts from the Yorkshire and Humber Plan be retained until the City of York Council prepare and adopt their local plan clearly defining the inner boundary of the Green Belt around the City of York. The Government agrees that policies related the York Green Belt should be retained.</p> <p>The Government also notes</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p data-bbox="531 1955 893 2024"><b>North York Moors National Park Authority</b></p>	<p data-bbox="946 383 1348 1055">the two representations received which made the case for revoking the York Green Belt Policies because it would encourage the City of York to rapidly progress the preparation of its local plan and that the tighter definition of York's Green Belt is likely to worsen the housing shortage in York. In view of the significant environmental effects which could result from the revocation of these policies, the Government disagrees with this proposed way forward.</p> <p data-bbox="946 1070 1348 1973">Likewise the Government notes the two representations which support the retention of York's Green Belt, but ask that the Government saves an "unadopted Local Plan 2005", which is not a part of the Yorkshire and Humber Regional Strategy and therefore has not been subject to the environmental assessment carried out. The Government disagrees with this proposed approach since the Government does not have powers to create new regional Strategy policies and considers that local plans, created by local authorities working together with their communities, should be at the heart of the planning system.</p> <p data-bbox="946 1989 1262 2018">The scale and form of</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>and <b>Yorkshire Dales National Park Authority</b> considered revocation of the regional strategy will remove an important safeguard for National Parks, particularly in relation to local authorities addressing housing need, which is not sufficiently replaced by the National Planning Policy Framework.</p>	<p>development that would be considered acceptable on the boundaries of a National Park is one example of the kind of strategic planning issue that local planning authorities, including National Park Authorities, will have to work on collaboratively under the duty to co-operate. Those local authorities within the parts of the former Coastal and Remoter Rural sub-areas adjacent to the National Parks should set out a scale and form of development that would be considered acceptable on the boundaries of a National Park, having regard to national planning policy and the duty under section 62 of the Environment Act 1995.. Other priorities could include the conservation and enhancement of the natural and historic environment, including protection of the landscapes which border the boundaries of National Parks. Moreover, National Park Authorities are a statutory consultee on planning applications that could affect a National Park. They should respond, setting out their case, if they consider that any impacts would compromise the purposes of National Park designation.</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p><b>RenewableUK</b> commented on the loss of guidance on renewable energy deployment resulting in a detrimental effect on the deployment of onshore wind, carbon dioxide emission reductions and climate change mitigation. The retention of Policies YH2 and ENV5 was suggested.</p>	<p>The Government does not believe that retaining the Policies YH2 (Climate Change and Resource Use) and ENV5 (Energy) of the Yorkshire and Humber Plan is necessary because it will be for local planning authorities to determine local responses to the issue of renewable energy generation consistent with the objectively assessed and up to date needs of their communities, following the guidance on such issues set out in the National Planning Policy Framework.</p>

Rotherham Metropolitan Borough Council and EDF Energy supported the Government’s plan to replace the eight regional strategies with a localist approach to determining the most appropriate scale and distribution for future growth underpinned by the National Planning Policy Framework.

English Heritage, North Yorkshire County Council, Rotherham Metropolitan Borough Council, Fulford Parish Council, Strensall and Towthorpe Parish Council, the Yorkshire Local Councils Association and the Town and Country Planning Association all supported the reasonable alternative to retain Policy YH9 from the Yorkshire and Humber Regional Strategy for a transitional period of 2 to 3 years until the City of York adopted a new local plan defining the inner boundary of York’s Green Belt. City of York Council also requested the retention of Policy YH9 until York adopts its new local plan, which it is currently preparing, so as to safeguard the historic setting of York.

In light of the findings of the assessment as reported in the Environment Report, the comments received from consultees and the framework for environmental protection and planning that is in place, the Government is content that environmental considerations have been adequately incorporated into the plan as adopted (the Plan to Revoke the Regional Strategy, modified to retain the York Green Belt Policies). As explained in Chapter 5, where significant effects and/or uncertainty have been identified, a programme of

monitoring has been proposed to enable future consideration of whether any further mitigation or intervention is needed.

# Chapter 5

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

### 5.1 Policy Background

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

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

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

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

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

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

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

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

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

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

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

This policy background sets in context the reasons for the Government's adoption of the Plan to Revoke the Regional Strategy, modified to retain the York Green Belt Policies, and illustrates the structure of the planning system that will be left in place post revocation.

## 5.2 The Reasonable Alternatives

The initial 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 Regional Strategy entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F to the updated Environmental Report) including partial revocation. In considering these responses and following the application of Article 5(1) of the Strategic Environmental Assessment Directive, the following alternatives to the Plan to Revoke were taken forward for the updated Strategic Environmental Assessment:

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

## 5.3 Reasons for Choosing the Plan as Adopted in light of the other Reasonable Alternatives dealt with

The Government has carefully considered each of the reasonable alternatives and the environmental effects assessed in relation to those reasonable alternatives, set out in the updated Environmental Report<sup>3</sup>. In doing this, the Government has taken account of the consultation responses to both the initial and the updated Environmental Reports. The Government welcomes the comments on both of those reports and notes that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence to update and build on the earlier assessments, have been an important contribution to making the final decision on the Plan to Revoke the Yorkshire and Humber Regional Strategy. The summary of consultation responses set out in this Post Adoption Statement show that consultees welcomed the rigorous approach to assessment of environmental effects.

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

One consultee thought it was important that the impacts are understood, that the issues raised are taken into account in the outcome, and that it was unclear how this would be addressed as the outcome seemed to have already been set. The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives), the extensive consultation and consideration of consultation responses in the final decision to partially revoke the Yorkshire and Humber Regional Strategy, retaining policies to protect the York Green Belt.

Five respondents suggested additional monitoring measures. The proposals for monitoring, which take account of these responses, are set out in Chapter 6 and Annex C of this Post Adoption Statement. Lastly, there were also some questions from some respondents on individual topics such as Habitats<sup>4</sup>, mineral and waste management, flood risk and water management, the Green

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<sup>3</sup> Strategic Environmental Assessment of the Revocation of the Yorkshire and Humber Regional Strategy: AMEC Environment & Infrastructure UK Limited: September 2012

<sup>4</sup> This term is used to refer to sites protected under the European Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC).

Belt, the provision of gypsy and traveller pitches, heritage, climate change and renewable energy. The Government considers that these issues have all been adequately addressed in Appendix D and Appendix E of the updated Environmental Report.

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

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

(i) On the **retention** of the Yorkshire and Humber Regional Strategy but not updating it in the future it was noted in the updated Environmental Report that there will be significant positive environmental effects, although these will be largely similar to those if the Regional Strategy were revoked. The areas where retention of the Regional Strategy would lead to significant negative effects are in relation to material assets, air and climatic factors although the Government notes that a similar policy performance is recorded for the revocation alternative. For the majority of policies, the updated Environmental Report found it difficult to identify clear differences between the effects of retention and revocation with the exception of policies related to the York Green Belt. The Government considers that the retention of the whole Regional Strategy would lead to a strategy that was a consideration in plan-making and decision taking but with policies based on increasingly out of date evidence or which run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning and does not therefore consider that it should pursue this alternative.

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

(iii) Specific effects for the **retention for a transitional period of all policies which set the quantum for development or which are spatially specific** were identified in the updated Environmental Report. These include potential significant positive effects on biodiversity, population, water, cultural heritage,

and landscape. Likely significant negative environmental effects were identified on material assets due to an increased resource use and waste generation. However, these effects (both positive and negative) were similar to those identified for the revocation of these policies. The updated Environmental Report also noted that retention of these policies for a transitional period may result in some confusion with the intent of the National Planning Policy Framework and how they are to be applied. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would be based on increasingly out of date evidence or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The updated Environmental Report further noted that “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 National Planning Policy Framework’s presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.” In the absence of a mechanism to review the policies in the future, these shortcomings would remain in place until the policies were revoked.

(iv) **Regarding retention of policies, the revocation of which may lead to likely significant negative environmental effects**, two policies in the Yorkshire and Humber Plan, Policy YH9 Part C and Policy Y1 Parts C1, C2 and the Key Diagram in relation to the York Green Belt were identified, the revocation of which could cause negative effects on cultural heritage in the short term, possibly becoming significant in the medium term. The updated Environmental Report indicated that there would be a risk (during the period between revocation and the York City Council adopting a local plan) of development being approved on land that would otherwise be in the York Green Belt – with potentially cumulative significant adverse impacts on the special character and setting of the historic city. Chapter 4.4.5 of the updated Environmental Report stated that this risk could be mitigated by retaining these policies until York City Council adopts the local plan which is in preparation.

The Government notes the eight representations received regarding the retention of policies in the Yorkshire and Humber Plan aimed at protecting the York green belt until the City of York Council prepare and adopt their local plan clearly defining the inner boundary of the Green Belt around the City of York. In particular, English Heritage support the retention of Policy YH9: Green belts from the Yorkshire and Humber Regional Strategy until the City of York adopt a new local plan defining the inner boundary of York’s Green Belt. **North Yorkshire County Council** supports the retention of Policy YH9, which can be achieved by retaining the regional strategy for a transitional period of 2 to 3 years. **Rotherham Metropolitan Borough Council** support the retention of policies that provide a statutory basis for the York Green Belt in order to give the local authority time to adopt a York Green belt boundary in their local plan. **City of York Council** request the retention of part C of Policy YH9, excluding reference to taking account of levels of growth set out

in the regional strategy, parts C1 and C2 of Policy Y1: York sub area policy and the Key Diagram of the Yorkshire and Humber Plan (2008) for up to 5 years or until York adopts its new local plan (which ever is the earliest) it is currently preparing, so as to safeguard the historic setting of York. **Fulford Parish Council** also requests the retention of part C of Policy YH9 and parts C1 and C2 of Policy Y1. **Strensall and Towthorpe Parish Council** request retention of policies that define the green belt around York, supported by Mr Julian Sturdy MP, until the City of York Council provide a local plan. The **Yorkshire Local Councils Association** also support the retention of policies that define the York Green belt until York adopts an up to date local plan. **Town and Country Planning Association** also support the retention of part C of Policy YH9 and Parts C1 and C2 of Policy Y1 and the relevant parts of the associated Key Diagram in order to give spatial expression to the Green Belt around York until and up-to-date local plan is in place.

The Government agrees that policies related the York Green Belt should be retained because of the potential significant environmental effects. However, the second sentence of policy YH9 states that: "The boundaries must take account of the levels of growth set out in the Yorkshire and Humber Plan and must also endure beyond the Plan process." The Government does not consider it is necessary to retain this second sentence since it refers to levels of growth set out in other policies in the Yorkshire and Humber Plan which would be revoked. Turning to the Key Diagram, the Government does not consider that saving the whole diagram is necessary - but saving those parts of the diagram which relate to the York green belt would be helpful, in particular to illustrate the general extent of the York Green belt and its inner and outer boundary.

The Government also notes the two representations (Persimmon Homes and Jennifer Hubbard (Planning Consultant)) received which made the case for revoking the whole of the Yorkshire and Humber Regional Strategy including policies that define the York Green Belt. Jennifer Hubbard considered that it is not necessary to save Policy YH9 and if saved it would result in the City of York Council taking longer to prepare their local plan and finally settle the issue of York's Green Belt inner boundary. Persimmon Homes considered that the Green Belt as defined in the regional strategy negatively impacts upon York's housing markets and encourages more unsustainable commuting into York as people have to "leap frog" the Green Belt to access affordable housing. They considered that revocation of the York Green belt policies will not result in a significant negative effect in the short term. However, in view of the significant environmental effects which could result from the revocation of these policies, the Government disagrees with this proposed way forward.

Likewise the Government notes the two representations (Heslington Village Trust and Mr Richard Frost) which support the retention of policy YH9 from the Yorkshire and Humber Plan, but ask that the Government also saves an "un-adopted Local Plan 2005" until York adopts a new local plan. However this un-adopted Local Plan is not a part of the Yorkshire and Humber Regional Strategy and therefore has not been subject to the environmental assessment carried out. The Government disagrees with this proposed approach since the Government does not have powers to create new

Regional Strategy policies and considers that local plans, created by local authorities working together with their communities, should be at the heart of the planning system.

In relation to each of the reasonable alternatives assessed there has not been found to be a significant difference in the environmental effects as against those for the preferred option of revocation, with the exception of the policies in relation to the York Green Belt (as evidenced in Appendix D of the updated Environmental Report). For retaining quantified and spatially specific priorities there were found to be potential positive and negative effects, but recognition that policies are based on evidence that would become increasingly out of date and could gradually lead to a decline in the positive effects that the strategy aimed to deliver and potential conflicts with policies that local communities wish to pursue. For these reasons and given the structures and framework already in place the Government does not consider that the retention of any of the policies in the Yorkshire and Humber Regional Strategy is necessary, with the exception of the York Green Belt policies set out in the Yorkshire and Humber Plan.

Therefore in light of the policy background and reasons for the Plan to Revoke the Yorkshire and Humber Regional Strategy, consideration of the environmental effects of the Plan to Revoke and the reasonable alternatives, and consideration of responses to the Environmental Reports, the Government has decided to partially revoke the Yorkshire and Humber Regional Strategy, but retain the following policies from the Yorkshire and Humber Plan aimed at protecting the Green Belt around the City of York:

**a) Policy Y1:** York sub area policy: title, opening line and paragraphs 1 and 2 of Part C:

“Policy Y1: York sub area policy

Plans, strategies, investment decisions and programmes for the York sub area should:

1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York city centre and the inner boundary in line with policy YH9C.
2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minister and important open areas.”

**b) Policy YH9: Green Belts:** title and first sentence of Part C:

“Policy YH9: Green Belts

The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.”

c) The **Key Diagram**, insofar as it illustrates the retained policies and the general extent of the Green Belt around the City of York.

# Chapter 6

## The measures decided concerning monitoring

Monitoring of the effects of the Plan to Revoke the Yorkshire and Humber Regional Strategy as adopted (modified to retain the York Green Belt Policies from the Yorkshire and Humber Plan) will focus on:

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

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

The monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts. For example, the Environment Agency's requirements under the Water Framework Directive (2000/60/EC), the Department for Environment, Food and Rural Affairs' requirements with regard to Air Quality Management Areas and the Department for Communities and Local Government's commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The metrics are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

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

# ANNEX A

## **Consultation and Partner Engagement – Initial Environmental Report**

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

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

**Table A1 Summary of statutory body's responses at the Strategic Environmental Assessment scoping stage (this Table has been revised following the close of consultation on the updated Environmental Report)**

No	General	Detailed comments	Raised by	Response
1.	Scope and Detail	The <b>Environment Agency</b> agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. <b>Natural England</b> 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. <b>English Heritage</b> focussed their comments on the implications for heritage on the proposed revocation.	<b>Environment Agency, Natural England, English Heritage.</b>	The updated Environmental Report has been produced consistent with the requirements of the SEA Directive. Responses to the detailed points raised at the scoping stage are set out in the rest of this table.
2	Reliance on the duty to co-operate and the National Planning Policy Framework	The <b>Environment Agency, Natural England</b> and <b>English Heritage</b> questioned whether the reliance on the draft Duty to co-operate was sufficient to capture and address cross-boundary issues or cumulative effects of multiple local authorities' local plans.	<b>Environment Agency, Natural England, English Heritage.</b>	Since the scoping report was prepared the Government has published the National Planning Policy Framework in March 2012 and commenced provisions in the Localism Act 2011 implementing the duty to co-operate.

No	General	Detailed comments	Raised by	Response
3	Topics to be considered	<p>The <b>Environment Agency</b> considered that the impacts on climate change, water quality and water resources should be fully assessed. The Water Framework Directive should be considered as well as strategic planning of water resources.</p> <p><b>Scottish Natural Heritage</b> thought there should be consideration of the impacts on the protection and enhancement of networks to allow species dispersal throughout Britain.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework. Since the National Planning Policy Framework was still in its draft form, this needed to be more fully considered. It is also difficult to predict what local authorities will do post revocation of regional strategies so that the environmental effects of their</p>	<p><b>Environment Agency;</b>  <b>Scottish Natural Heritage.</b></p>	<p>Appendix D of the updated Environmental Report contains an assessment of the effects of retention and revocation of individual policies on climate change, water quality and water resources.</p> <p>Appendix E of the updated Environmental Report reviews the baseline condition for each of the SEA topics (including climatic factors and water) and assesses the likely effects on the baseline of retaining and revoking individual policies, the Regional Strategy as a whole and reasonable alternatives.</p>

No	General	Detailed comments	Raised by	Response
		revocation is more likely to be “uncertain” rather than positive.		
4	Water Quality	The <b>Environment Agency</b> suggested updating the baseline, particularly when referring to water quality. Water quality has improved, although fewer than only 25 per cent of the river water bodies in the region currently achieve good ecological status.	<b>Environment Agency.</b>	In accordance with Annex 1(f) of the Strategic Environmental Assessment Directive water quality issues have been assessed in the updated Environmental Report under the SEA topic “water”. This includes consideration of the topic in Appendix E of the updated Environmental Report, taking account of the more up-to-date data contained in relevant River Basin Management Plans.
5	Water resources	The <b>Environment Agency</b> considered that the objectives and requirements of the Water Framework Directive should be considered in the Environmental Reports. This would help provide a strategic consideration of environmental constraints, including cross-boundary issues, particularly on water quality.	<b>Environment Agency.</b>	In accordance with Annex 1(f) of the Strategic Environmental Assessment Directive water resources have been assessed in the updated Environmental Report under the SEA topic “water”. This includes the consideration of the topics in Appendix E of the updated Environmental Report, as part of the assessment of the retention and revocation of individual policies and the overall assessment of the revocation of the Yorkshire and Humber Regional Strategy and reasonable

No	General	Detailed comments	Raised by	Response
				alternatives. This also takes account of the strategic planning cross-boundary issues including through assessment of the water companies' Water Resources Management Plan.
6	Waste	<p>The <b>Environment Agency</b> referred to Article 7 of the Waste Framework Directive (requirement for Waste Management Plans) explaining that it is currently implemented through a tiered system of waste planning in England, including the regional tier. They recommended that the requirements of Article 7 of the Waste Framework Directive (2006/12/EEC) are included within the assessments, as waste policies within the Regional Strategies will need to be adopted nationally and/or locally to satisfy the Directive's requirements.</p> <p>They added that if Waste Local Development Frameworks are going to take policies forward, then they will need a strong evidence base to support them.</p>	<b>Environment Agency.</b>	The provisions of Article 7 has been superseded by provisions set out in Article 28 of the revised Waste Framework Directive (2008/98/EC). The National Planning Policy Framework was published in March 2012. Paragraph 153 of the framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst Section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more local planning authorities may agree to prepare one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However, such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning

No	General	Detailed comments	Raised by	Response
		<p>Updated and agreed evidence could be shared between authorities at a strategic level, to help ensure facilities are built in the best locations and at the best scales.</p>		<p>Policy Framework including for the planning of waste infrastructure.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National Planning Policy Framework states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for waste and its ability to meet forecast demands.</p>
7	Climate Change	<p>Climate risk and associated adaptation actions should be assessed to help ensure resilience to future climate change. Local authorities could put monitoring mechanisms in place, as</p>	<p><b>Environment Agency, Scottish Natural Heritage.</b></p>	<p>Climate change issues are assessed as part of the climatic factors topic in set out in Appendix E of the updated Environmental Report. We have considered mechanisms for monitoring resilience to climate change</p>

No	General	Detailed comments	Raised by	Response
		<p>action or inaction by one local authority could impact on neighbouring authorities. The <b>Environment Agency</b> suggested that possible mechanisms for monitoring resilience to climate change are considered within the assessment.</p> <p>The Environmental Report stated that local authorities may find it useful to draw on regional data including assessments of the potential for renewable and low carbon energy. This should be considered in greater detail at the next stage of the environmental assessment. Strategic issues need to be addressed</p>		<p>and the proposals for monitoring, including for climatic factors, have also been considered in Chapter 6 and Annex C of this Post Adoption Statement.</p> <p>Data prepared at a regional level to inform the preparation of regional strategies is still available for local planning authorities to use, individually or collectively where they have decided to prepare joint local plans or development plan documents on strategic planning issues such as waste management, transport infrastructure or large scale housing development. Local planning authorities will also commission additional research when necessary on a variety of key planning issues including assessment of the potential for renewable and low carbon energy.</p>
8	Growth	Assumptions on future growth, including for housing allocations, are important when making assessments of the potential impacts of revocation of the regional strategies. An assumption that lower levels of growth (than that proposed by the Regional Strategy) may	<b>Natural England, Environment Agency, English Heritage.</b>	<p>The updated Environmental Report took into account local plan policies on housing, pitches for gypsies and traveller sites, renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded on and updated, in the updated Environmental</p>

No	General	Detailed comments	Raised by	Response
		<p>be pursued by local authorities may lessen pressures on negative regional trends.</p> <p>It is possible that some local authorities may decide to increase their housing figures above Regional Strategy targets which could potentially result in significant environmental effects.</p> <p>It may become more challenging to accommodate growth in certain river catchments - all available, up-to-date information should be utilised when carrying out the next stage of the assessment.</p>		<p>Report, including for heritage assets and river basin management plans.</p>
10	Cumulative Effects	<p>The <b>Environment Agency</b> commented that the Environmental Report should effectively assess cumulative impacts and mitigation measures of many small adverse impacts on the environment for instance on climate change including greenhouse gas emissions.</p>	<b>Environment Agency.</b>	<p>Cumulative impacts are taken into account in the assessment presented in the updated Environmental Report. The approach to the analysis is set out in the methodology in Chapter 3, and a discussion of the impacts is included in Chapter 4 of the updated Environmental Report.</p> <p>Mitigation measures are considered throughout the updated Environmental Report, including for individual SEA topics,</p>

No	General	Detailed comments	Raised by	Response
				and the retention and revocation of individual regional policies.
11	Regional Heritage Policies	<p><b>English Heritage</b> noted that some policies are only in regional strategies, not in local plans hence the risk of “policy gaps” if these regional policies are not saved. They questioned the assumption that local authorities will carry forward regional policies to secure the boundaries of Green Belts around historic settlements, and whether existing national heritage policies will be carried forward to the National Planning Policy Framework. They thought that regional heritage policies do not just repeat national policy, but include regionally specific detail. They asked for more material to be included in the historic environment baseline data.</p> <p>They commented that policy for the historic environment tends to provide a framework for the management of those heritage assets which are considered to make an important contribution to the distinct identity of the region. Because</p>	<b>English Heritage.</b>	<p>The National Planning Policy Framework, published in March 2012, continues to provide protection for heritage assets and designated heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, which have a degree of significance meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.</p> <p>The Government attaches great importance to Green Belts and has maintained strong protection for them in the National Planning Policy Framework. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt</p>

No	General	Detailed comments	Raised by	Response
		<p>these may be undesignated, yet significant, and span local authority boundaries, the Regional Strategy sought to provide a co-ordinated framework for their management, e.g. Vale of Pickering (ENV9).</p> <p>It is also important to ensure the Environmental Reports do not only focus on matters relating to the high status designated heritage assets. The Regional Strategy was also designed to provide a holistic approach, urging consideration of the commonplace and everyday heritage that provides the backdrop to people's daily lives – championing local distinctiveness and sense of place.</p> <p>It is important to ensure that the assessment of the likely significant effects of the revocation is not based solely on access to heritage, leisure and recreation facilities. Where “access” to the assets rather than their “protection” or “enhancement” has been the over-riding consideration in terms of</p>		<p>policy, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework is also clear that once established, Green Belt</p>

No	General	Detailed comments	Raised by	Response
		<p>assessing the impact of the policies and proposals of the Regional Strategy then the potential impact upon the historic environment itself will have been either under-estimated or not considered at all.</p> <p>Spatial decisions in Regional Strategies have regard to the environmental capacity and sensitivities and in certain situations, such as in York; limited capacity resulted in the restriction of development contrary to the evident demand. It should not be assumed that this responsive approach will be maintained in any local equivalent plan.</p>		<p>boundaries should only be altered in exceptional circumstances. A change to a Green Belt boundary would need to take place through the local plan process, which would involve public consultation and an independent examination. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green belt are also included.</p>

No	General	Detailed comments	Raised by	Response
				The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt.

# Representations received in response to the initial public consultation on the proposed revocation of the Yorkshire and Humber Regional Strategy

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

The representations received on the proposed revocation of the Yorkshire and Humber Regional Strategy have been summarised below. The responses are grouped under the following themes:

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

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

**Table A2 Responses to the consultation on the initial Environmental Report (published in October 2011) (this table has been revised following the close of consultation on the updated Environmental Report)**

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	<b>The Overall Approach to SEA</b>	The <b>Environment Agency</b> supported the broad approach to the analysis presented in the Environmental Reports published in October 2011. <b>Natural England</b> recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of <b>English Heritage</b> had concerns about the potential impact of revocation 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.	<b>Environment Agency, Natural England and English Heritage.</b>	The impact of retaining, partially revoking and fully revoking the Yorkshire and Humber Regional Strategy has been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This includes an assessment of cultural heritage – including architectural and archaeological heritage.
2	<b>The Overall Approach to SEA</b>	The consultation on the assessment of the revocation of regional strategies which ran from October 2011 was contrary to the requirements of Article 6(5) of the Directive.	<b>Clyde and Co LLP and Icen Projects.</b>	The Government disagrees that the consultation process undertaken in October 2011 was contrary to the requirements of Article 6(5) of the Directive which states that the “detailed

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>arrangements for the information and consultation of the authorities and the public shall be determined by Member States". This requirement is transposed into English law by regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The Environmental Report, which was published for public consultation in October 2011, and the updated Environmental Report published in September 2012, (which took account of consultation responses on the initial Environmental Report and was itself open to consultation for 3 months), demonstrates the Government's desire to consult fully on the assessment of the impacts of revocation of the Regional Strategy.</p>
3	<b>The Overall Approach to SEA</b>	The environmental assessment had been carried out too late in the process, and should have been conducted prior to the initial decisions to revoke the regional strategies. Strategic Environmental Assessment carried out at an early stage	<b>RenewableUK, Royal Society for the Protection of Birds, Wildlife and Countryside</b>	The Government signalled its proposed intention to remove the regional tier of Government and return decision making on housing and planning to local authorities in the coalition agreement. Parliament subsequently removed of the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>and with an open mind helps to identify the environmental consequences of revocation and steps which could be taken to mitigate any adverse impacts (such as saving significant environmental policies).</p>	<p><b>Link.</b></p>	<p>legal framework for Regional Strategies through the repeal of Part 5 of the Local Democracy, Economic Development and Construction Act 2009 (through section 109 of the Localism Act 2011) and gave the Secretary of State powers to revoke the whole or any part of a Regional Strategy by order.</p> <p>Any decision to revoke the regional strategies has always been subject to the outcome of the environmental assessments.</p> <p>The Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of responses, demonstrates this and is in accordance with the requirements of the Strategic Environmental Assessment Directive and its objectives. Each policy in the regional strategy has been assessed.</p> <p>The outcome of the consultations on the Environmental Reports form part of the matters that will be taken into account in</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				deciding whether or not to revoke the regional strategies and reasonable alternatives to that.
4	<b>The Overall Approach to SEA</b>	The <b>Town and Country Planning Association</b> were concerned that the Environmental Reports did not represent an analytically robust and rigorous assessment of the likely impacts or how they may be mitigated. They considered that not all of the Directive's provisions had been addressed with sufficient robustness to provide an appropriate means of assessment, with, for example, reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The Environmental Reports did not explore the potential short-term impacts that could arise in the interim period while the Regional Strategy is revoked, but before adopted local plans are in place. The reports do not project what the future might be like under local plans prepared with a minimum of national guidelines. The reports should contain more analysis of minerals and waste,	<b>Town and Country Planning Association.</b>	The October 2011 Environmental Report was structured around the individual requirements of the Strategic Environmental Assessment Directive. Chapter 1 of the updated Environmental Report set out which parts of the report address the requirements of the Directive. Chapter 1 (Table 1.2) of the updated Environmental Report sets out how the report (and appendices) address the requirements of the Directive. Chapter 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation. Chapter 3 of the updated Environmental Report sets out the approach taken to complete the assessment. This includes the assessment scope, covering the topics included, the spatial extent of effects

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		infrastructure, town centre development, new settlements and major urban expansions.		considered and the definitions of short, medium and long term timeframes employed. Appendix E sets out the collated contextual and baseline information, on a topic-by-topic basis, for each of the assessment topics (including evolution of the baseline).
5	<b>Assessment – likelihood of effects</b>	The assessment had placed unquestioning faith in the environmental benefits of the Government’s planning reforms, and seemed to be a justification for revocation rather than objective analysis. The assumptions within the Environmental Report that revocation of the Regional Strategy will have no significant adverse environmental effects were untested and unsupported by evidence.	<b>Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.</b>	The short, medium and long term impacts of retaining, partially revoking and revoking the Yorkshire and Humber Regional Strategy have been assessed in detail in the updated Environmental Report for each of the 12 Strategic Environmental Assessment topics.
6	<b>Assessment – cumulative impacts</b>	The Environmental Report should assess the cumulative effects of revocation, in particular the consequent capacity for ‘linked or cumulative, synergistic or secondary effects’ coupled with the need for environmental assessment to adapt to the scale and nature of the plan in question.	<b>Clyde and Co LLP, Levett-Therivel, Treweek Environmental Consultants, Collingwood</b>	To provide the context for the assessment, and in compliance with the Strategic Environmental Assessment Directive, the relevant aspects of the current state of the environment and its evolution without the plan were considered, along with environmental

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		The assessment should include a consideration of the impact of the revocation of all the Regional Strategies.	<b>Environmental Planning.</b>	characteristics likely to be significantly affected. Chapter 3 of the updated Environmental Report sets out the assessment methodology for cumulative, synergistic or secondary effects. Chapter 4 contains a consideration of these effects.
7	<b>Assessment – mitigation</b>	No mitigation measures are presented in the Environmental Reports because no impacts have been identified.	<b>Levett-Therivel, Tweek Environmental Consultants, Collingwood Environmental Planning.</b>	Appropriate mitigation measures are proposed in Chapter 4 of the updated Environmental Report, as well as in Appendix D.
8	<b>Assessment – strategic planning</b>	The Regional Strategies provided strategic policies to ensure that development can be planned in a way that is compatible with biodiversity targets. There are similar issues with water supply/demand, for example, under the Water Framework Directive (2000/60/EC), to ensure that housing development will be compatible with the requirements for favourable status and there are knock on implications for	<b>Levett-Therivel, Tweek Environmental Consultants, Collingwood Environmental Planning, Town and Country Planning Association.</b>	The National Planning Policy Framework, published in March 2012, states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport,

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>European protected sites.</p> <p>The <b>Town and Country Planning Association</b>. considered that the Environmental Reports understated the benefits of regional policy which all the original Strategic Environmental Assessment had identified. They also considered that there was insufficient detail to show how the new planning reform measures would deal effectively with strategic spatial issues.</p>		<p>telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>In the updated Environmental Report it has also been considered relevant to reference the duty to co-operate for a number Regional Strategy policies.</p>
9	<b>Assessment - baseline data</b>	<p>Statutory Agencies identified more recent environmental data than that used in the Environmental Reports - such as data used to inform the preparation of the River Basin Management Plans, and on climate change and sea level rise. Other respondents asked for other baseline data to be updated, for data on human health to be included and for data to better reflect the economic climate. Some respondents</p>	<p><b>Natural England, Environment Agency, Treweek Environmental Consultants, Clyde and Co LLP, Town and Country Planning</b></p>	<p>The baseline data has been updated and expanded in the updated Environmental Report, and described for the 12 Strategic Environmental Assessment topics in Annex E. Maps have been included. This data has been used to inform the assessment the strategic environmental impacts of the revocation of the Yorkshire and Humber Regional Strategy and a number of alternatives.</p>

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

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>revoke the Regional Strategy. So the evolution of the environmental baseline without the plan will mean in this instance, the evolution of the baseline with the retention of the existing Regional Strategy. Therefore, and where appropriate in addition to using projections, this assessment has used the findings of the relevant sustainability appraisal and appropriate assessment which were undertaken when the original Regional Spatial Strategy and Regional Economic Strategy were prepared to help provide an informed understanding of the likely future evolution of the baseline. This information is contained in Appendix E and presented within each topic chapter.</p>
12	<p><b>Assessment – Special Protection Areas and Special Areas of Conservation</b></p>	<p>Information on the existing impacts on Special Protection Areas and Special Areas of Conservation should be provided.</p>	<p><b>Levett- Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.</b></p>	<p>The updated Environmental Report contains an Appendix G listing all Special Protection Areas and Special Areas of Conservation and the impact on particular sites has been drawn out where relevant.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
13	<b>Assessment – method statement</b>	Information should be provided on who has carried out the assessments, details of the consultation with statutory agencies, responses to scoping responses and what problems were faced.	<b>Levett- Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.</b>	Detail of the preparation of the report, consultation with the statutory agencies, responses to scoping comments, and difficulties faced with the analysis are set out in Chapters 1 and 3 and Appendix F of the updated Environmental Report.
14	<b>Assessment – non technical summary</b>	The non-technical summaries are not consistent with the Strategic Environmental Assessment Directive requirements. They are generic and make assertions that are not based on evidence.	<b>Levett- Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.</b>	A non-technical summary which is based on the findings of the assessment and consistent with the requirements of the Strategic Environmental Assessment Directive is included in the updated Environmental Report.
15	<b>Assessment – local plans</b>	<b>The Woodland Trust</b> thought that the baseline information in the original Strategic Environmental Assessment of the Regional Strategy identified increasing environmental pressures arising from development. It felt these still needed to be addressed in the absence of the strategy. As a result of this, they believed there should be much more emphasis on the Strategic Environmental Assessment process for Development Plan	<b>The Woodland Trust, Friends of the Earth, Council for the Protection of Rural England. Professor Alan Townsend.</b>	The Government agrees that Local Plans are subject, and will continue to be subject, to Strategic Environmental Assessment consistent with the requirements of the Strategic Environmental Assessment Directive.  Local authorities' planning policies and decisions must reflect, and where appropriate promote, relevant obligations under European law and statutory

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Documents, with particular emphasis on the effect of cumulative impacts.</p> <p><b>Campaign for the Protection of Rural England</b> stated that the reports should have considered appropriate evidence that currently exist, such as changes to Core Strategies made subsequent to the announcement that regional plans would be abolished. They suggested that no such assessment had been made. As a result there were no recommendations about how the plan making process might be improved to address environmental issues, for example, by strengthening the Sustainability Appraisal process at local authority level.</p> <p><b>Friends of the Earth</b> were concerned that the statement in the Environmental Reports that local authorities would deal with environmental issues was not based on a full analysis of whether local plans do have strong local environmental policies in place similar to those in the Regional Strategies in a situation where they were specifically not supposed to duplicate regional policy; or in areas where there are no local plans. In</p>		<p>requirements including on the environment.</p> <p>The updated Environmental Report includes an analysis of the content of local plans at Appendix C, focussing on housing allocation, gypsies and traveller pitches, renewable energy, employment land, minerals and waste.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>addition, the assumption that there are 'strong protections' for the environment in national planning policy had been disputed by several Non Government Organisations.</p> <p><b>Professor Alan Townsend</b> considered the reference in the reports that the removal of the Regional Strategies would create 'opportunities for securing environmental benefits' to be unfounded. Referring to the North East, as an example, he commented that the experience of <b>Campaign for the Protection for Rural England</b> was that economic and commercial pressures would act as a serious threat to a balanced approach to the environment and to development. He also referred to paragraph 1.25 in the Environmental Report where it is stated that environmental effects cannot be predicted for certain because they depend on local decisions, but disagreed with the view that decisions taken locally will look to maximise positive environmental outcomes for the local area.</p>		
16	<b>Assessment – reasonable</b>	The environmental assessment had considered too narrow a range of	<b>Royal Society for the</b>	The updated Environmental Report draws on the consultation responses and the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	<b>alternatives</b>	<p>alternatives. The only alternative considered was no revocation. This in turn means that there are no clear recommendations to address the practical question of whether the proposed planning system, centred on the National Planning Policy Framework and local plans, should be modified to address environmental issues that arise from the abolition of regional planning.</p> <p>Other alternatives suggested were:</p> <ul style="list-style-type: none"> <li>• reviewing the Regional Strategies;</li> <li>• revoking the Regional Strategies but saving key policies;</li> <li>• the retention of the Regional Strategy system with regional groupings of local authorities responsible for drafting them and adoption by the Secretary of State;</li> <li>• 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</li> </ul>	<p><b>Protection of Birds, Wildlife and Countryside Link, Campaign for the Protection of Rural England, Renewable UK; Clyde and Co LLP, Irish Travellers Movement in Britain, Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Hull City Council.</b></p>	<p>findings of the assessment to develop a number of alternatives and identifies three reasonable alternatives to complete revocation for assessment. Chapter 2.4 of the updated Environmental Report describes the alternatives considered and the reasons for the selection of the alternatives dealt with. The reasonable alternatives include retention, revocation and partial revocation.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>cover specific issues;</p> <ul style="list-style-type: none"> <li>• revoking certain chapters or parts of the strategies and introducing transitional arrangements.</li> </ul>		
17	<b>Assessment - monitoring</b>	<p><b>Natural England, Campaign for the Protection of Rural England and Town and Country Planning Association</b> considered that it was not clear whether the local authorities, Government or any other body would collate the authorities' monitoring information and assess it to determine where more than local gaps in policy or problem areas were arising.</p> <p>The <b>Town and Country Planning Association</b> suggested that there was a need to monitor the general impact of the Government's planning changes. Consistent and effective monitoring on the effects of the 'duty to co-operate' over the next 2-3 years was particularly important, for example, by tracking local plan progress on local authority websites in a systematic but simple way.</p>	<p><b>Natural England, Campaign for the Protection of Rural England; Town and Country Planning Association, Levett- Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Clyde and Co LLP, Forestry Commission.</b></p>	<p>Proposals for monitoring are set out in Chapter 5 of the updated Environmental Report.</p>

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		<p><b>Levett- Therivel, Treweek Environmental Consultants, and Collingwood Environmental Planning</b> suggested that the effects of revocation should be monitored, for example, to track housing completions and development on Green Belt.</p> <p><b>Clyde and Co LLP</b> considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p> <p>The <b>Forestry Commission</b> commented that the monitoring and sharing of information was far easier with the Monitoring Group established by the Regional Assembly. Local authorities were unlikely to monitor if this is not a requirement given funding constraints. The Annual Monitoring report produced by the Regional Assembly was extremely valuable for measuring the implementation of plans and policies particular those policies which set targets, for example the Forestry Commissions believe that it was unclear</p>		

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		how national targets for carbon reduction could be measured and met. Whilst local planning authorities may be responsible for monitoring: the Forestry Commission asked who they will report to and how (a) cumulative effects or (b) actions in one local authority being undermined in another could be assessed.		
18	Reliance on the draft NPPF	<b>Natural England, the Environment Agency, the Town and Country Planning Association and Campaign for the Protection of Rural England</b> noted that it was difficult to come to a view on the significance of the environmental effects of revocation, prior to the publication of the final National Planning Policy Framework and the implementation of the new “duty to co-operate”. <b>Campaign for the Protection of Rural England</b> for example, commented that as a result of the wider changes in planning it was inherently difficult to assess the likely impact of the revocation of Regional Strategies. In particular, the content of the final National Planning Policy Framework and future local plans were	<b>Natural England, Environment Agency, Town and Country Planning Association, Campaign for the Protection of Rural England, Wildlife and Countryside Link, Levett-Therivel, Treweek Environmental Consultants, Collingwood</b>	The National Planning Policy Framework was published in March 2012. The National Planning Policy Framework is consistent with the Government’s Natural Environment White paper, and makes it clear that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and sets out as a core planning principle that planning should recognise the intrinsic character and beauty of the countryside. The Framework also maintains protection for designated areas such as the Green Belt, Areas of Outstanding Natural Beauty, National Parks, and Sites of Special Scientific Interest. It sets out

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		<p>uncertain and neither of these statements could currently be fully tested. They expressed concern that the Environmental Reports did not give a comprehensive overview of the potential environmental impact of the Government's intentions.</p> <p><b>Levett- Therivel, Treweek Environmental Consultants and Collingwood Environmental Planning</b> questioned the evidence that the National Planning Policy Framework will be so favourable to the environment or sustainable development, as the National Planning Policy Framework has not been subject to Strategic Environmental Assessment.</p> <p><b>Natural England</b> agreed with the assessment that there was an inherent difficulty in providing an assessment of the National Planning Policy Framework as an alternative, as it was not known how the final version would differ from the consultation draft.</p>	<p><b>Environmental Planning.</b></p>	<p>policy for the support of delivery of renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The National Planning Policy Framework is not subject to Strategic Environmental Assessment as it is high level policy and does not fall within the scope of the Strategic Environmental Assessment Directive.</p>

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		<p><b>Scottish Power Renewables</b> were of the view that the Regional Strategies have a key role in ensuring that national policy objectives are met and encouraged the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the regional plans do and could continue to play a key role in the strategic planning of onshore wind and the infrastructure to support the development of offshore wind. They were therefore concerned that the process for the revocation of Regional Strategies pre-empted the final National Planning Policy Framework and requested that the Government require local authorities to put in place policies to ensure a contribution to the national renewable energy targets, in line with the National Policy Statement.</p> <p><b>RenewableUK</b> shared the concern about the reliance on the draft National Planning Policy Framework and were concerned that the draft National Planning Policy Framework did not contain a sufficient level of detail to support renewable energy</p>		

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		<p>planning.</p> <p>The <b>Royal Society for the Protection of Birds</b> and the <b>Wildlife and Countryside Link</b> considered it misleading for the initial Environmental Reports to imply that the planning reform would usher in new policies that, on balance, would make up for the loss of Regional Strategies. They considered, for example, that even though 'top-down' housing targets were being removed, the stated purpose of planning reform was to create more growth and to deliver more housing. There was no criticism of Regional Strategy housing figures being too high, only that they were 'top-down'. It therefore followed that local authorities would use similar methodologies and arrive at similar figures when 'objectively assessing' housing need.</p> <p><b>Friends of the Earth</b> stated that local authorities will have to be guided by the policies in the National Planning Policy Framework. Based on the draft National Planning Policy Framework text, in many</p>		

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		<p>cases, local authorities will struggle to take decisions on a 'local' basis to protect the environment. They stated that legal advice obtained by them showed that the concept of local decision-making was outweighed by the wording used in the draft National Planning Policy Framework which is directive on the need to approve development. They also pointed to shortcomings in the draft National Planning Policy Framework on sustainable development, countryside and biodiversity, transport, water, and climate change mitigation and adaptation.</p> <p>The <b>Wildlife and Countryside Link</b> were concerned that the Environmental Reports relied so heavily on the draft National Planning Policy Framework, which had not been finalised and was therefore subject to change.</p> <p><b>The Theatres Trust</b> suggested that suitable policy within the National Planning Policy Framework and other measures needed to be in place to ensure the pooling of knowledge on physical and social cultural infrastructure, particularly theatres, if the</p>		

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		plans are revoked.		
19	<b>Assessment - policy change</b>	<p><b>Natural England</b> noted that the revocation of the Regional Strategies would require local planning authorities to incorporate relevant environmental policies, previously included in the Regional Strategy, into their local plans or to rely on National Planning Policy Framework policies. The full effect of revoking individual Regional Strategy policies was therefore likely to depend greatly on where individual local authorities were in their local plan-making process. Where local authorities had not yet adopted core strategies, in the absence of regional strategies, they considered that it may be much more difficult for them to develop locally tailored evidence-based policies.</p> <p><b>The Environment Agency</b> welcomed the Environmental Report highlighting which parts of current national policy and guidance were important to help avoid significant adverse environmental impacts. Where local authorities had adopted Core Strategies that were developed with a backdrop of the Regional Strategy, a robust</p>	<p><b>Natural England, The Environment Agency, Royal Society for the Protection of Birds, Wildlife and Countryside Link, Hull City Council, Theatres Trust, Friends of the Earth, RenewableUK.</b></p>	<p>The National Planning Policy Framework, published in March 2012, sets out the Government's planning policies for England.</p> <p>The National Planning Policy Framework emphasises the need for local planning authorities to plan strategically. The National Planning Policy Framework states that local planning authorities should set out their strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and</p>

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		<p>National Planning Policy Framework would need to ensure that any potential policy gaps were filled.</p> <p>The <b>Royal Society for the Protection of Birds</b> proposed that the Government should not revoke the Regional Strategies in full. They suggested that saving key environmental policies until they were replaced by equivalent local plan policies would significantly mitigate the risk of environmental harm. Saved policies should be kept in place during a transitional period while local plans were updated, which could easily coincide with the transitional period in which the National Planning Policy Framework was translated into local plans.</p> <p><b>Hull City Council</b> considered that revocation of saved structure plan policies in conjunction with the revocation of Regional Strategies will lead to a policy void, with the potential for serious environmental consequences. Therefore the revocation of Regional Spatial Strategies should not take place until adequate environmental alternatives are in</p>		<p>adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>The National Planning Policy Framework also makes clear that, where it would be appropriate and assist the process of preparing or amending Local Plans, Regional Strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of Regional Strategies to support their Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>Climate change is one of the core land use planning principles which the National Planning Policy Framework expects should underpin both plan-making and decision-taking. Local planning authorities are expected to adopt proactive strategies to mitigate climate change and co-operate to deliver strategic outcomes which include climate change. They should plan for new</p>

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		<p>place.</p> <p>The <b>Wildlife and Countryside Link</b> suggested that Government and its agencies should work together with local authorities and their partners in each region to identify which Regional Strategy policies should be saved, while local plans were updated to incorporate those policies.</p> <p>The <b>Royal Society for the Protection of Birds</b> and the <b>Wildlife and Countryside Link</b> considered that revocation would remove a raft of policies on issues, such as those on the natural environment and renewable energy, that were largely not contentious, and the product of close cooperation between local authorities and other interested parties.</p> <p>The <b>Theatres Trust</b> stated that the proposed revocation of the Regional Strategies could have adverse social effects. The Regional Strategies included measures for local authorities to work collaboratively 'to increase investment in physical and social infrastructure'. This may</p>		<p>development in locations and ways which reduce greenhouse gas emissions (including through transport solutions which support reductions in greenhouse gas emissions); actively support energy efficiency improvements to existing buildings; and promote energy from renewable and low carbon sources. These strategies are expected (paragraph 94 of the National Planning Policy Framework) to be in line with the objectives and provisions of the Climate Change Act 2008. There is a legal requirement on local planning authorities to ensure their Local Plan (taken as a whole) includes policies designed to tackle climate change and its impact. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental</p>

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		<p>not take place on such a scale, even with the duty to co-operate, if Regional Strategies are revoked. The Theatres Trust believes that this would have ensured that cultural facilities were in place for communities to share and that places exchange knowledge when creating new buildings or networks, so that resources were not squandered by the repetition of mistakes. Thus, it was suggested that measures needed to be in place to ensure the pooling of knowledge on physical and cultural infrastructure, which also affect theatres, if the Regional Strategy is revoked.</p> <p><b>RenewableUK</b> were of the view that the revocation of the Regional Strategies would create a policy gap which would affect the ability of local authorities to make informed decisions. They did not believe that a reliance on national policy and the duty to co-operate was sufficient to ensure that the UK met its renewable energy generation and carbon emissions reduction targets.</p> <p><b>Friends of the Earth</b> were concerned that the Strategic Environmental Assessment of</p>		<p>dimensions of sustainable development.</p>

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		<p>the revocation of the Regional Strategies do not fully assess the environmental impacts of the incoherent policy context that would arise. They recommended that to fill the gap left by the Regional Strategies, local plans should absorb the regional evidence bases for renewable energy resources, and 'save' renewable energy target and adaptation policies where this would otherwise leave a gap in local frameworks. They added that the loss of the Regional Strategy left a gap in the consideration of the global impacts of a local authority's areas consumption/ indirect impacts. They were of the view that the footprint approach at a regional level specifically aimed to counter a strictly localist approach of local authorities. They were concerned that local authority plans would only consider local resource management and the whole footprint approach would be lost. They considered it essential that the evidence base section of the draft National Planning Policy Framework was revised to include the concept of foot printing to acknowledge the burden of resource use within a local</p>		

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		<p>authority on other areas. They therefore recommended that local authorities ‘save’ relevant policies where this would plug a gap in their existing local planning framework until the next appropriate review date; and DCLG should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary co-operation.</p>		
20	<p><b>Reliance on the duty to co-operate</b></p>	<p><b>Natural England</b> and the <b>Environment Agency</b> welcomed the emphasis given to cross boundary working which could potentially promote partnership working and offer a more strategic approach to spatial planning. However, both organisations commented that the Environmental Reports did not identify how the duty to co-operate would work in practice or replace the co-ordination provided by the regional strategies and the various working groups that existed within this structure. <b>Natural England</b> also considered that there was too much reliance on the assumption that local planning authorities would continue to work together on strategic issues under the duty</p>	<p><b>Natural England, Environment Agency, English Heritage, Royal Society for the Protection of Birds, RenewableUK, Town and Country Planning Association, Friends of the Earth, Clyde and Co LLP, Hull City Council,</b></p>	<p>The Government recognises the importance of strategic planning. The National Planning Policy Framework, published in March 2012, makes clear that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation</p>

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		<p>to co-operate. It was noted that the Duty would not apply to private sector companies who provide public services such as water and sewerage, energy and telecommunications, many of which would have a key role to play in infrastructure planning. The <b>Environment Agency</b> stated that common intelligence and joint working arrangements were needed between partner local authorities and other key organisations to develop an integrated approach to planning.</p> <p>The <b>Environment Agency</b> referring to the duty to co-operate accepted that local authorities would work with adjacent councils, but not at a range of scales including a catchment scale. They considered that this was important as building development at the top of a catchment could increase run-off and cause flooding many miles downstream. They suggested that this is recognised so that the duty to co-operate could fully support strategic planning at a local level.</p> <p><b>Natural England</b> accepted that it was possible that cross-boundary impacts may</p>	<p><b>Professor Alan Townsend, Campaign to Protect Rural England.</b></p>	<p>will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a</p>

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		<p>be assessed between adjoining authorities, but were unclear how the cumulative impacts of multiple authorities' plans would be assessed to take into account issues occurring within broader environmental boundaries, such as water catchments. Both the <b>Environment Agency</b> and <b>Natural England</b> sought further clarification on mechanisms which could be employed to ensure that likely cumulative, in-combination and cross-boundary environmental impacts, are identified, assessed and monitored as part of the Local Plan process and duty to co-operate.</p> <p><b>English Heritage</b> noted how critical it was that the duty to co-operate was taken forward by local authorities and public bodies to ensure that the strategic planning issues are successfully addressed, based on a shared understanding of local needs and the wider context. However, they saw a danger that the wider perspective gained through strategic planning would be lost. They suggested that the National Planning Policy Framework and any guidance issued to support it; may assist with this by</p>		<p>joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such they may be found unsound.</p> <p>As a further check, the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and regulations made under the 2004 Act require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about</p>

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		<p>encouraging strategic analysis through sub-national partnerships in appropriate circumstances.</p> <p>While the <b>Royal Society for the Protection of Birds</b> welcomed the strengthening of the duty to co-operate during its Parliamentary passage, they remained sceptical that the duty would deliver contentious forms of development where it is needed or effective strategic planning for the natural environment. They were concerned by the unsubstantiated assumption that the duty to co-operate would overcome the strategic vacuum left by the revocation of the Regional Strategies. They stated, as an example, that there was no recognition of the shortcomings caused by having multiple plans being developed over multiple time and spatial scales, and the difficulties this would cause in terms of assessing the cumulative impacts of development.</p> <p><b>RenewableUK</b> also expressed the view that the duty to co-operate provisions in the</p>		<p>their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The prescribed bodies are:</p> <ul style="list-style-type: none"> <li>• the Environment Agency;</li> <li>• the Historic Buildings and Monuments Commission for England (English Heritage);</li> <li>• Natural England;</li> <li>• the Mayor of London;</li> <li>• the Civil Aviation Authority;</li> <li>• the Homes and Communities Agency;</li> <li>• Primary Care Trusts;</li> <li>• the Marine Management Organisation</li> <li>• the Office of Rail Regulation</li> <li>• the Highways Agency;</li> </ul>

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		<p>Localism Act appear weak, with no clear means of ensuring that local authorities would co-operate productively. They considered that a lack of strategic action on mitigation and adaptation to climate change was likely to result in significant and unpredictable effects on biodiversity, flora and fauna. Other elements, such as population, human health etc. would also be adversely affected.</p> <p>The <b>Town and Country Planning Association</b> indicated that it had made clear that the duty to co-operate had a range of significant limitations - having a narrow remit, a retrospective sanction and no defined or specific outcomes. They considered that even where joint cooperation was enthusiastically entered into by local authorities the nature of cooperation would be on a smaller spatial scale and with a tighter remit and much less resource than the statutory Regional Strategy process. They considered that this may lead to increased environmental impacts and may limit effective responses on renewable energy and catchment scale</p>		<ul style="list-style-type: none"> <li>• Transport for London;</li> <li>• Integrated Transport Authorities; and</li> <li>• Highway authorities</li> <li>• Local Nature Partnerships</li> <li>• Local Enterprise Partnerships</li> </ul> <p>The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning Policy Framework states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy</p>

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		<p>or coastal flood risk.</p> <p><b>Hull City Council</b> commented that whilst public bodies can consult, meet and discuss, Members of local authorities are democratically elected to carry out the wishes of their own electorate. This means the wishes of the electorate of adjoining authorities can differ and in some cases agreement will not be possible.</p> <p><b>Friends of the Earth</b> considered that revocation would leave a gap in both planning policy on environmental issues and in a regional understanding of them. They considered that the duty to co-operate was unlikely to provide an effective response to the wider pattern of unsustainable pressures and growing regional inequalities in England. They suggested that the Duty does not require co-operation on any specific issues. Issues which are by their nature spatial and cross-boundary, for example, river basin management, flood risk, green infrastructure, and transport, would suffer from the removal of the Regional Strategy. While, for example, river basin</p>		<p>(including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>management plans are developed by the Environment Agency, local authorities and others, the context for local decision-making on planning applications will still lack regional spatial awareness of the larger than local and cumulative impacts of decisions. This will lead in many cases to poor planning, and increased negative environmental impacts. They were concerned that there are no sanctions for local authorities who fail to co-operate, while local authorities who have failed to persuade neighbouring authorities to co-operate would suffer if the Inspector judged their plan to be unsound as a result.</p> <p><b>Clyde and Co LLP</b> considered that it was not adequate to base the environmental assessment on the expectation that authorities would co-operate. It was therefore inappropriate for the assessment of likely effects, as encapsulated within the Environmental Reports, to be predicated on that basis.</p> <p>Another consultee (<b>Professor Alan Townsend</b>) suggested that a number of policy areas would be under threat from</p>		

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		<p>relying on the duty to co-operate, such as, climate change, river flooding, Areas of Outstanding Natural Beauty, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing.</p> <p><b>The Campaign to Protect Rural England</b> considered that the reliance on the duty to co-operate since it was not yet clear how the proposed duty to co-operate will meet environmental conservation and enhancement goals. They suggested that Local Nature Partnerships should be given enough weight in decision making to help influence strategic planning.</p>		
21	<b>Individual Topics - Access to Data</b>	<p>The <b>Town and Country Planning Association</b> commented that the initial environment reports do not use primary data or new secondary data which was available, for example on water management. Nor do they provide a range of scenarios to gain a more robust understanding of the potential impacts of the revocation. Referring to the comment in</p>	<b>Town and Country Planning Association, Clyde and Co LLP.</b>	<p>The National Planning Policy Framework, published in March 2012 makes it clear that local planning authorities may also continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up -to-date, robust local evidence. The National Planning Policy Framework (paragraphs</p>

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		<p>the Environmental Reports that local authorities can continue to draw on available information, including data from partners, to address cross-boundary issues, it was not clear whether data previously collated as part of the Regional Strategy preparation process would remain up-to-date, or whether coordinated monitoring mechanisms would continue to exist in the future.</p> <p><b>Clyde and Co LLP</b> consider that the baseline information is considerably out of date as it does not reflect the ongoing economic recession and the “significant confusion wrought by the Secretary of State’s approach to the revocation of Regional Strategies”.</p>		<p>158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.</p>
22	<b>Individual Topics -Green Belt</b>	<p><b>English Heritage</b> was concerned that deletion of criterion C of Policy YH9 (which provides the statutory basis for the definition of a Green Belt around York) could have a significant adverse impact upon the historic character and setting of the City unless similar provisions are put in</p>	<p><b>English Heritage, JC Consultants, Campaign for the Protection of Rural England.</b></p>	<p>The National Planning Policy Framework, published in March 2012, makes it clear that the Government attaches great importance to Green Belts, and overall that the planning system should recognise the intrinsic character and beauty of the countryside. The</p>

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		<p>place in emerging legislation/ regulations.</p> <p><b>JC Consultants</b> considered that the Environmental Report misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p> <p><b>Campaign for the Protection of Rural England</b> considered that the Environmental Report was inaccurate in stating that “Revocation would remove the top-down pressure on local authorities to review the extent of their Green Belt. Protecting the Green Belt brings many environmental benefits including safeguarding the countryside and preventing urban sprawl”. The Yorkshire and Humber Plan did not exert undue pressure on the Green Belt. They considered that its core policy</p>		<p>fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> <li>(i) to check the unrestricted sprawl of large built-up areas;</li> <li>(ii) to prevent neighbouring towns merging into one another;</li> <li>(iii) to assist in safeguarding the countryside from encroachment;</li> <li>(iv) to preserve the setting and special character of historic towns; and</li> <li>(v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport</p>

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		<p>principles around urban renaissance, concentration of growth and conservation of the countryside gave weight to the protection of the green belts, particularly in West, North and South Yorkshire. Specifically, the plan includes policies for the Green Belt around York (Policies Y1 and YH9) to safeguard its historic setting. In terms of Green Belt policy, there was a need for more flexible wording in the Regional Strategy, particularly in areas like Doncaster, which have half a green belt in place.</p>		<p>and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p>If proposing a new Green Belt, local planning authorities should: demonstrate why normal planning and development management policies would not be adequate; set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; show what the consequences of the proposal would be for sustainable development; demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and show how the Green Belt would meet the other objectives of the National Planning Policy Framework.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The National Planning Policy Framework also states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green</p>

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				<p>Belt boundary.</p> <p>Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in</p>

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				<p>the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the National Planning Policy Framework clearly state that when local planning authorities are ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, this is consistent with the policies set out in the National Planning Policy Framework, including policies on the protection of Green Belts.</p> <p>In addition, the presumption in favour of sustainable development makes a clear reference to Green Belts when it lists policies in the National Planning Policy</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>Framework that indicate that development should be restricted.</p> <p>Following consultation on the updated Environmental report, the Government intends to retain certain policies set out in the Regional Spatial Strategy which relate to the York Green Belt. The detail and reasons for this decision are set out in Chapter 5 of this Post Adoption Statement.</p>
23	<b>Individual Topics - Gypsies and Travellers</b>	<b>The Garden Court Chambers Gypsy &amp; Traveller Team</b> considered that the revocation of Regional Strategies would have a detrimental effect upon the provision of sites for Gypsies and Travellers. They considered that the view in the Environmental Reports that sufficient sites would be delivered by local authorities without regional or national supervision was misconceived. They were therefore	<b>The Garden Court Chambers Gypsy &amp; Traveller Team, Community Law Partnership, Friends, Families and Travellers, National</b>	It is the Government's view that Local authorities are best placed to understand the needs of their communities. The Government has produced new planning policy for traveller sites that reflects this. The policy published in March 2012 <sup>5</sup> makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while

<sup>5</sup> <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>disappointed that consideration had not been given to the alternative option of retaining those regional policies relating to the provision of sites for Gypsies and Travellers. <b>Community Law Partnership</b> supported these comments and added that revocation would lead to a decrease in the provision of new sites which would have an inevitable result in the numbers of Gypsies and Travellers on unauthorised encampments and unauthorised developments increasing. <b>Friends, Families and Travellers</b> also supported these comments and stated that they objected most strongly to the proposals to abolish Regional Strategies and, at the very least, considered that an option which retains a regional perspective should be retained for the provision of Gypsy and Traveller sites.</p> <p>The <b>National Federation of Gypsy Liaison Groups</b> also disagreed with the conclusions in the Environmental Reports that revocation was unlikely to have any significant environmental effect on human health, population, cultural heritage or the</p>	<p><b>Federation of Gypsy Liaison Groups.</b></p>	<p>respecting the interests of the settled community.</p> <p>Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust evidence of need that will be tested at the Local Plan examination.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>(i) identifying and updating annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;</li> <li>(ii) identifying a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;</li> <li>(iii) considering the production of joint</li> </ul>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>historic environment. The revocation of policies relating to the provision for Gypsies, Travellers and Travelling Showpeople, would have a significant impact as a direct result of the fact that without a regional framework, local authorities were likely to, and already were, including reduced pitch numbers in their Development Plan Documents. The resulting lack of suitable accommodation was directly related to poor health and lower life expectancy, difficulty in accessing education opportunities, which contributed to poor living conditions, for example, on unauthorised sites. Unauthorised sites also impacted on the environment, for example if they were not suitably located there could be local impacts on the landscape.</p>		<p>development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.</p> <p>The duty to co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.</p> <p>The proposal to abolish Regional Strategies is part of a wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority councillors on their</p>

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

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		<p>housing allowance (except in very prescribed circumstances) would, in practice, lead to an inevitable allocation of more greenfield sites.</p> <p><b>Levett-Therivel, Treweek Environmental Consultants</b> and <b>Collingwood Environmental Planning</b> noted that Regional Strategy Policies LCR1 and LCR2 provided detailed information about where and how development should take place in the Leeds region, including infrastructure requirements. The Environmental Report merely states generically that potential impacts related to LCR2 "would be covered through local plans".</p> <p><b>Hull City Council</b> considered that removal of Regional Strategy policies YH4 and YH5 would remove the city first focus and the development hierarchy. This in turn would lead to excessive and inappropriate development in rural locations. They considered that food security needed to be considered, as did the environmental impact of removing the hierarchy. On Policy YH7 (Location of Development) the report states: "Removing the phasing of</p>		<p>producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The National Planning Policy Framework states that Local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>development gives local authorities greater flexibility to deliver a wide range of housing sites to meet their requirements.” However, they stated that this policy was not about phasing, it was about adopting a sustainable approach to development. By favouring previously developed land where suitable, the Regional Strategy protects greenfield sites from excessive and inappropriate development. They considered this to be more sustainable than having no priority. The removal of this policy was therefore likely to have a negative environmental impact.</p>		<p>Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>
25	<b>Individual Topics - Heritage</b>	<p><b>English Heritage</b> was concerned about the loss of the strategic analysis of the distinctive characteristics of the historic environment in each region, which they considered could often only be identified at a greater than local level. They were also concerned about gaps left by the abolition of regional level historic environment policies. They suggested that this should be considered urgently within Local Plan reviews.</p>	<b>English Heritage.</b>	<p>The National Planning Policy Framework continues to provide protection for heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments that have a degree of significance meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical</p>

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		<p>They added that national planning policy, by necessity, only deals in very general terms with the management of the historic environment. One of the key elements of the Regional Strategy in terms of the historic environment is that it identifies and sets out a framework for the management of those heritage assets which are considered to make an important contribution to the distinct identity of Yorkshire. Many of these are undesignated and a large number of the areas it identified cross local planning authority boundaries. Whilst Planning Policy Statement 5 sets out generic guidance on the conservation of heritage assets and, under the new legislation, there will be a duty to co-operate between local authorities and other agencies, there is a concern that, in the absence of a clearly-articulated and co-ordinated strategy for the management of these important historic areas, they will be omitted from local plans and, therefore, not receive the same degree of protection that the Regional Strategy provided.</p>		<p>presence, but also from its setting.</p> <p>The National Planning Policy Framework includes as one of its core planning principles that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.</p> <p>In developing their strategy, local planning authorities should take into account: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation</p>

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				<p>of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.</p> <p>The strategy in a Local Plan can identify heritage assets of local and more than local importance, including those of national and international importance.</p>
26	<b>Individual Topics – Waste</b>	<p>The <b>Environment Agency</b> commented that the assessment of waste policies was quite comprehensive, but they were concerned with the second sentence in the last paragraph on page 61 of the Environmental Report which stated that, “local waste authorities already work together, and with other bodies, on strategic issues that cross local authority boundaries and may work together to produce joint waste plans if they wish”. As waste plans are currently produced at county and unitary level, they questioned whether the Government was suggesting wider than county waste plans.</p>	<b>Environment Agency, Woodland Trust.</b>	<p>The National Planning Policy Framework was published in March 2012. Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more Local Planning Authorities may agree to prepare one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the</p>

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		<p>If that was the case, they recommended that further details are provided on how this will be applied.</p> <p>The <b>Woodland Trust</b> commented that the draft National Planning Policy Framework had stated that waste would be considered in a National Waste Management Plan. No date has yet to be given for the publication of this plan. Therefore there will be a lack of environmental protection in the interim which has not been accounted for.</p>		<p>legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework.</p>
27	<b>Individual Topics – Biodiversity</b>	<p>On the basis of the content of the consultation draft of the National Planning Policy Framework, <b>Natural England</b> disagreed with the statement in Chapter 1.2 of the Environmental Reports that the National Planning Policy Framework “maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl</p>	<b>Natural England, Woodland Trust, Scottish Natural Heritage, The Environment Agency.</b>	<p>The National Planning Policy Framework was published in March 2012. The finalised version makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provided net gains in biodiversity where possible, and contribute to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>and preserve wildlife”.</p> <p>The <b>Woodland Trust</b> highlighted how in ‘Making Space for Nature’ Lawton set out that planning at different geographical scales was vital to inform conservation decisions. It also sets out that planning is pivotal in maximising the contributions of the existing network and ensuring that new components are sited in effective locations. The Trust believed that ‘Nature Improvement Areas’ recommended by Lawton would be very difficult to implement without the Regional Strategy in place.</p> <p><b>Scottish Natural Heritage</b> suggested that the Environmental Reports should address the protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the Environmental Reports if they identified a framework for establishing networks of green infrastructure across all the regions of England, with the potential to link with Wales and Scotland, rather than just to propose partnerships across local authority</p>		<p>The National Planning Policy Framework also states that local plans contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</p> <p>The National Planning Policy Framework also asks that, in order to minimise impacts on biodiversity and geodiversity, planning policies should: plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.</p> <p>The National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships (two of which exist in Yorkshire and Humber) to assess existing and potential components of ecological</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>boundaries.</p> <p>The <b>Environment Agency</b> sought clarification of the statement that: “The policy objective could be delivered by other means than through a Regional Strategy. Biodiversity is roughly holding steady after a historic downward trend and the Plan would have had little effect on this”. They commented that Policy ENV8 in the Regional Strategy aimed to safeguard and enhance ecology, and ensure that it functioned as an integrated network of connected corridors, thereby reversing the pattern of fragmentation, loss and decline and making biodiversity more resilient to future changes. This was supported by an opportunity map which directed delivery to key areas. This approach was key to delivering net biodiversity gain in the right place to ensure ecological functionality, and would have a positive effect. They suggested that the National Planning Policy Framework policy on the natural environment should reflect the Natural Environment White Paper by aiming to halt overall biodiversity loss, supporting healthy</p>		<p>networks.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		well-functioning ecosystems and establishing coherent ecological networks.		
28	<b>Individual Topics - Renewable Energy</b>	<b>RenewableUK</b> were concerned that the Strategic Environmental Assessment process failed to fully account for the impact that the removal of the Regional Strategies would have on the ability of local authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of generating 15% of all energy from renewables by 2020. Overall, they suggested that there will be significant environmental effects of revoking the regional plans, if guidance and support for renewable energy development was not strengthened. Under existing proposals, the key mechanisms for strategic planning and renewable energy would be lost.	<b>RenewableUK.</b>	<p>The National Planning Policy Framework, published in March 2012, includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>The National Planning Policy Framework contains a number of policies aimed at encouraging the development of renewable energy development including that local planning authorities should :</p>

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				<p>have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.</p> <p>In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
29	<b>Individual Topics - Transport</b>	<p><b>Friends of the Earth</b> considered that the removal of the Regional Strategies would in some cases have a negative environmental effect as their transport policies were stronger than those presented in the draft National Planning Policy Framework.</p> <p><b>The South Yorkshire Passenger Transport Executive</b> stated that they did not object to the principle of revoking the Yorkshire and Humber Plan, but considered it essential that the more local focus is supported by strong governance to maintain strategic vision and that national policy continues to provide sufficient support to allow authorities to protect the environment whilst encouraging growth. South Yorkshire Passenger Transport Executive felt that further detail and guidance is required on how sustainability can be achieved.</p> <p><b>South Yorkshire Passenger Transport Executive</b> welcomed the Government proposal to introduce a 'duty to co-operate' on public bodies. They considered that as public transport operates across boundaries and environmental issues are not confined</p>	<b>Friends of the Earth, The South Yorkshire Passenger Transport Executive), Hull City Council.</b>	<p>The National Planning Policy Framework, published in March 2012, includes a number of core planning principles. These include the need to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The National Planning Policy Framework makes it clear that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>to administrative boundaries, collaboration with strategic bodies on cross boundary issues was essential. Working in partnership with surrounding areas to deliver a shared vision was key to tackling the environmental challenges faced. The Sheffield City Region Transport Strategy defines priorities over the next 15 years and contains a number of policies, some of which are specifically aimed at the environment, e.g. to improve air quality, support the generation of power from renewable sources, improve the efficiency of vehicles and encourage sustainable travel within the City Region.</p> <p><b>Hull City Council</b> considered that the statement “Support for air travel in transport policy (Policy T6) would have a negative impact on climate change” distorted the aims of the Regional Spatial Strategy. They suggested that if read along with the Regional Strategy’s supporting text it clearly explained that at present a lot of air freight destined for the region was flown to airports outside the area. Developing appropriate facilities within the region would reduce the</p>		<p>The National Planning Policy Framework also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.</p> <p>The National Planning Policy Framework is clear that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also says that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>need to transfer the freight by road, and in some cases would shorten the flight, both of which have a positive impact on climate change. In addition, they considered the Regional Strategy to adopt a pragmatic stance. Airports are a part of modern life, and it is better to have policies in place to ensure that airport development proposals are carried out in an integrated and sustainable way. To simply dismiss Policy T6 as having a negative impact on climate change was unsound.</p>		<p>The National Planning Policy Framework sets out that when planning for airports that are not subject to a National Policy Statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this as well as the principles in the relevant National Policy Statements and the Government Framework for UK Aviation. More generally the Framework adopts a substantially more positive approach to enabling sustainable development through proactively, localist planning. We are therefore of the view that revoking Policy T6 would not substantially change the assessment of the environmental, social and economic impacts of additional airport capacity as this is addressed in general and aviation specific policy in the National Planning Policy Framework.</p>
30	Individual Topics -	Levett-Therivel, Trewick Environmental Consultants and Collingwood	Levett-Therivel, Trewick	The National Planning Policy Framework, which was published in March 2012, is

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	<b>Water</b>	<b>Environmental Planning</b> noted that Policy ENV2 which protected the Sherwood Sandstone aquifer would be removed, to be replaced by the much vaguer measure of joint working by the Environment Agency, water industry bodies and others.	<b>Environmental Consultants, Collingwood Environmental Planning.</b>	<p>clear that local planning authorities should work with other bodies to assess the capacity of water supply infrastructure, and should set out in the Local Plan their strategic priorities and policies for the provision of such infrastructure.</p> <p>More generally the National Planning Policy Framework tells local planning authorities to adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant obligations under European law – which include, for</p>

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				example, obligations under the Water Framework Directive (2000/60/EC).
31	<b>Individual Topics - Brownfield land</b>	<b>Campaign for the Protection of Rural England</b> noted that the Yorkshire and Humber Plan was very focused in promoting urban renaissance and directing regeneration and growth to urban areas whilst supporting and improving rural communities and the treasured landscapes in Yorkshire. These principles had laid a strong spatial foundation for the regeneration and improvement of several parts of the region. They commented that it was difficult to fully appreciate how the new planning framework would support these higher level aspirations for the region in the future, relying on the 'duty to co-operate' for local areas to work together to make sure that there is a shared vision to continue to regenerate urban areas. The policies in the Yorkshire and Humber Plan, which supported the spatial vision for the region gave local authorities a focus and a clear set of priorities to work to together in the region. Local authorities shared a vision	<b>Campaign for the Protection of Rural England.</b>	The National Planning Policy Framework was published in March 2012. One of the 12 planning principles set out in the National Planning Policy Framework is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The National Planning Policy Framework makes it clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111).

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>about growing urban economies and supporting services whilst protecting their environmental quality. To prevent adverse environmental effects in removing this tier of planning policy, the principal underlying these policies needed to be captured more directly in the national planning framework.</p> <p>They added that the Environmental Report points to Local Enterprise Partnerships as a vehicle to work with Local Authorities within the parameters of the 'duty to co-operate' to deliver regeneration needs that have been strongly supported through regional policy in the past. Campaign for the Protection of Rural England's concern was that the Local Economic Partnership's have been established with economic regeneration as their focus and there is little, if any, representation from environmental bodies on decision making panels. It was therefore difficult to see how environmental concerns within the region were going to be considered within this new context for growth and regeneration.</p> <p>The Yorkshire and Humber Plan set a target of 65% housing development on</p>		

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		brownfield land or through conversion of existing buildings. Campaign for the Protection of Rural England were concerned that losing this target, which supports a brownfield first approach to development, could have a serious consequence on the location of future housing development and hence the environment. Coupled with the potential loss of the brownfield first policy in national policy more generally, there would be an influx of housing being built in less sustainable locations. In Yorkshire and the Humber, they considered there was a need to focus housing development in areas where the market has failed.		
32	<b>Individual Topics - Coast</b>	<b>Scottish Natural Heritage</b> thought that there should be consideration of impacts on shared marine and coastal environments. A loss of strategic planning could reduce benefits and/or increase impacts from individual plans or actions, though the role of Shoreline Management Plans and Integrated Coastal Zone Management in providing strategic planning was	<b>Scottish Natural Heritage.</b>	The National Planning Policy Framework was published in March 2012. The core planning principles recognise that planning should take full account of flood risk and coastal change. The National Planning Policy Framework also asks that local planning authorities should set out the strategic priorities for their area in their Local Plan, and that this should

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		recognised.		include strategic policies to deliver the provision of infrastructure for coastal change management. In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. Local planning authorities should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and: be clear as to what development will be appropriate in such areas and in what circumstances; and make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. When assessing applications, authorities should consider development in a Coastal

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				<p>Change Management Area appropriate where it is demonstrated that: it will be safe over its planned lifetime and will not have an unacceptable impact on coastal change; the character of the coast including designations is not compromised; the development provides wider sustainability benefits; and the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast. Local planning authorities should also ensure appropriate development in a Coastal Change Management Area is not impacted by coastal change by limiting the planned life-time of the proposed development through temporary permission and restoration conditions.</p>
33	<p><b>Individual Topics</b> - <b>Flooding</b></p>	<p>The <b>Environment Agency</b> welcomed the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' duties on flood risk management and the complementary duty in the Floods and</p>	<p><b>Environment Agency, Campaign for the Protection of Rural England.</b></p>	<p>In March 2012 the Government published the National Planning Policy Framework which contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that local</p>

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		<p>Water Management Act on bodies to co-operate. The provision of technical guidance, including on flood and coastal erosion risk, to complement the National Planning Policy Framework would support Lead Local Flood Authorities and help achieve the duty to co-operate.</p> <p><b>Campaign for the Protection of Rural England</b> commented that the Regional Strategy required local authorities to plan for the successful adaptation to the predicted impacts of climate change by, for example, minimising threats from and impact of coastal erosion, increased flood risk, increased storminess, habitat disturbance, increased pressure on water resources, supply and drainage systems. The Environmental Report made reference to the expectations of national planning policy as an alternative mechanism of achieving objectives (annex A, page 42). They considered that the National Planning Policy Framework should clarify the need for planners to secure resilience to impacts other than flood risk and coastal change: particularly water resources, higher</p>		<p>planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the provision of infrastructure for flood risk and coastal change management.</p>

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		temperatures, landscape and biodiversity and the need for integrating mitigation and adaptation strategies.		
34	<b>Individual topics- Trees and Woodlands</b>	The <b>Woodland Trust</b> considered that the Regional Strategy gave strong protection to trees and woodland and in particular ancient woodland which is stronger than in national policy or in the draft National Planning Policy Framework. Therefore, in the absence of a need to bring their Local Development Framework documents into conformity with a regional plan, there is a danger that local authorities will give weaker protection to ancient woodland by following national planning policy. Policy ENV6 of the Regional Strategy also contains strong commitments to expanding woodland cover in the region and sets targets and indicators for this. The policy adopts the Woodland Trust's Access to Woodland Standard as an indicator of the need for new woodland creation. Several local authorities in the region including Calderdale, Leeds and Bradford have adopted the woodland access standard and	<b>Woodland Trust.</b>	The protection of ancient semi-natural woodland and other woodlands of acknowledged national or regional importance would remain in the absence of the plan (Paragraph 118 of the National Planning Policy Framework).

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>developed targets from it, as a result of its inclusion in the regional plan. Removal of this regional policy driver may lead to fewer local authorities adopting ambitious targets for woodland creation or standards by which the need for new woodland can be determined.</p>		
35	<p><b>Individual topics- Green Infrastructure</b></p>	<p><b>Hull City Council</b> noted that the report suggests that Policy YH8 on Green Infrastructure could be delivered through local plans and partnerships, citing Leeds and South Yorkshire as having green infrastructure strategies. However, as not all areas have such strategies in place; policy voids resulting in lack of protection would occur. It was their view that the removal of this policy would have a negative environmental impact.</p> <p><b>Campaign for the Protection of Rural England</b> noted that a lot of work has been undertaken in the Yorkshire and Humber Region to understand, map and improve the green infrastructure network across the region. This work was currently very strong in particular parts of the region and was</p>	<p><b>Hull City Council, Campaign for the Protection of Rural England.</b></p>	<p>Paragraph 114 of the National Planning Policy Framework provides the same policy approach as the Regional Strategy to the creation, protection, enhancement and management of networks of green infrastructure. Paragraph 99 of the National Planning Policy Framework notes that planning for green infrastructure can be a suitable adaptation measure to managing risks, including flood risks, arising when new development is brought forward in areas vulnerable to climate change impacts</p> <p>In addition, the Natural Environment White Paper introduces Local Nature Partnerships which will complement existing local partnerships which deal with matters such as provision of green</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>given weight in directing local planning policy formation in other areas due to the policy and directive contained within the Yorkshire and Humber Plan. Green infrastructure is a spatial planning issue that crosses administrative boundaries and requires direction and cooperation from a number of stakeholders. The Environmental Report states that local plans and existing green infrastructure partnerships will ensure that this work continues. However, there is no guarantee that this will happen with full coverage and cooperation across administrative boundaries and without a statutory requirement to do so. Therefore, this was one of the areas where the revocation of the regional spatial strategy could cause harm to the environment unless more direction is given at the national level.</p>		<p>infrastructure will improve the chances of the delivery of the policy. Such partnerships will be able to work across administrative boundaries enable planning of networks at the scale that has the most impact.</p>
36	<p><b>Individual topic - Landscape</b></p>	<p><b>Campaign for the Protection of Rural England</b> commented that landscape value was an integral part of the Yorkshire and Humber Regional Strategy and a core element of the regional and sub-regional</p>	<p><b>Campaign for the Protection of Rural England.</b></p>	<p>The National Planning Policy Framework published in March 2012 continues the emphasis placed on conserving landscape and scenic beauty in National Parks, the Broads and Areas of</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>policies within the plan. An important message in the Plan was contained in YH3 which promoted partnership working for effective coastal, landscape and environmental management of the region. This allowed local authorities and stakeholders to commit to some common goals for the region and work towards improving Yorkshire and Humber's environmental outcomes. The Yorkshire and Humber Plan recognised and reinforced the importance of maintaining and enhancing the special landscape assets that the region holds. The regional plan contained policies to protect areas of landscape value that were not necessarily designated and given statutory protection. This is potentially a serious policy gap to which the revocation of the plan will be detrimental to the quality of the environment in these areas. Moreover, the draft National Planning Policy Framework does not seek to protect areas of open countryside which are undesignated.</p> <p>They referred to Policy ENV10 which sets out priorities to conserve and enhance</p>		<p>Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty (paragraph 115).</p> <p>The National Planning Policy Framework also maintains the policy previously contained in Planning Policy Statement 7 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).</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>quality, diversity and distinctiveness of landscape character in the region. They considered that the Environmental Report did not address in sufficient detail the impact of losing an overarching policy such as this. The plan also seeks to provide a spatial strategy for growth and regeneration in Yorkshire and the Humber, protecting open countryside from expansion and maintaining its rural character. The plan gave local authorities direction to work towards growth in some areas and environmental protection in others. With the uncertain nature of the planning reforms, it is difficult to see how these broad spatial planning ideals will be worked towards cohesively by local authorities in the absence of the regional plan. A successful aspect of the Regional Strategy was the direction for a broad group of parties to work together, including environmental organisations, who played a part in the plan's preparation. Unfortunately, there is limited, if any space, for third sector groups in drawing up the current plans under the governments</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		planning reforms.		

# ANNEX B

## Consultation and Partner Engagement – Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the Yorkshire and Humber Regional Strategy ran from 28 September 2012 to 26 November 2012.

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

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for 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.

In total 26 written responses were received summarised by interest group:

- Six Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Historic Scotland, Scottish Environment Protection Agency and Scottish Natural Heritage);
- Six Local planning authorities (North Yorkshire County Councils, Rotherham Metropolitan Borough Council, North Yorks Moors and Yorkshire Dales National Parks, Hull City Council, City of York Council);
- Three Parish Councils (Fulford Parish Council, Strensall with Towthorpe Parish Council, Yorkshire Local Councils Association);
- Five NGOs and local pressure groups (Friends of the Earth, The Theatres Trust, The Wildlife Trusts Yorkshire and Sheffield &

Rotherham, Town and Country planning Association, Heslington Village Trust);

- Two industry representative bodies (EdF Energy and Renewables UK);
- Two developers and planning consultants (Jennifer Hubbard (Planning Consultants), Persimmon Homes); and
- Two individuals and MPs (Richard Frost, Julian Sturdy MP for York Outer).

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

**Table B1 Responses to the consultation on the updated Environmental Report (published in September 2012)**

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
1.	The overall approach taken to Strategic Environmental Assessment	<p><b>Natural England</b> welcomed the re-drafted Environmental Report, which they consider is a significant improvement over the previous iteration.</p> <p>The <b>Environment Agency</b> agreed with the overall approach and welcomed the Environmental Report as a more robust document than the previous one. They were pleased to note that most of their previous comments on earlier versions of the environmental report were reflected in Appendix F of the updated Environmental report.</p> <p><b>English Heritage</b> stated the report provides a much more rigorous assessment than its predecessor of the potential implications which revocation of the regional strategy will have on the region's historic environment. They agreed with the report's conclusions about the likely effects which the revocation of the regional strategy will have and broadly endorse the means which the absence of the regional strategy will be addressed by the implementation of the duty to co-operate and National Planning Policy Framework.</p>	<p>Comments noted.</p> <p>The Government welcomes the fact that the three English Strategic Environmental Assessment consultation bodies, English Heritage, Natural England and the Environment Agency consider the updated Environmental Report on the proposed revocation of the Yorkshire and Humber Regional Strategy provides a rigorous approach to the preparation of the Strategic Environmental Assessment and is an improvement on the initial Environmental Report published in October 2011.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Scottish Natural Heritage</b>, the <b>Scottish Environmental Protection Agency</b> and <b>Historic Scotland</b> did not anticipate any significant environmental effects from the revocation of the plan on the Scottish environment and had no further comments to make in the report.</p> <p><b>North Yorkshire County Council</b> considered that, broadly, the SEA was structured and undertaken in line with legislative requirements and options that it identifies and tests against are reasonable.</p> <p><b>Hull City Council</b> considers this report to be a much more robust assessment than the October 2011 version.</p> <p><b>Town and Country Planning Association</b> welcomes the fact that the Strategic Environmental Assessment process has been repeated with a methodology more closely aligned to the requirements of the Strategic Environmental Assessment Directive.</p> <p><b>EDF Energy</b> supports the Strategic Environmental Assessment that the Government has undertaken of the proposed revocation of the Yorkshire and Humber regional strategy and supports the initiative to replace the eight regional strategies with a localist planning agenda underpinned by the</p>	<p>The Government welcomes the comments from the three Scottish Strategic Environmental Assessment consultation bodies, Scottish Natural Heritage, the Scottish Environmental Protection Agency and Historic Scotland who do not anticipated any significant environmental effects from the revocation of the plan on the Scotland's environment.</p> <p>The Government welcomes the comments on the updated Environmental Report which has been welcomed and thought robust by a wide range of interested parties, ranging from local planning authorities, such as, North Yorkshire County Council and Hull City Council, the Town and Country Planning Association, which is a nationally recognised Non Government Organisation, as well as a private company in the energy sector, EDF Energy.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		National Planning Policy Framework.	
2.	The overall approach taken to Strategic Environmental Assessment	<p><b>Rotherham Metropolitan Borough Council</b> agrees with the report's findings that for the majority of policies, it is difficult to identify clear differences between the effects of retention and revocation of the regional strategy.</p> <p><b>Rotherham Metropolitan Borough Council</b> urge the Government after considering the report and consultation responses to swiftly revoke the regional strategy.</p>	<p>Comments noted.</p> <p>The Government considers that local planning authorities working collaboratively together with the 14 bodies, or types of bodies, prescribed in regulations made under the duty to co-operate (section 33A of the Planning and Compulsory Purchase Act 2004) are able to deliver a strategic approach to planning which is cross boundary in approach.</p>
3.	The overall approach taken to Strategic Environmental Assessment	<p><b>Natural England</b> noted that the presentation of the material within Chapter 4 (Assessment of Effects of Revoking the Regional Strategy) and subsequent conclusions do not include sufficient justification for the scoring of the effects of revocation upon Strategic Environmental Assessment topics. They also noted that, for example, the effects of revoking Regional Spatial Strategy policy YH8 (Green Infrastructure) upon biodiversity is considered negative in the short term, unknown in the medium term, and significant positive in the long term, yet there is no explanation of these conclusions. They thought it usual for an environmental report to</p>	<p>Comments noted.</p> <p>Chapter 3 of the updated Environmental Report sets out the Strategic Environmental Assessment methodology used in the assessment. 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</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		include a commentary of how the scores in the matrix are determined. Where there is uncertainty or conflict within the assessment, a commentary should identify how the score has been reached.	<p>(Section 3.5).</p> <p>Section 3.4 sets out the two stage nature of the assessment:</p> <ul style="list-style-type: none"> <li>- A high level (or screening) assessment of the effects of the proposals for each regional strategy policy against all Strategic Environmental Assessment topics to identify those where there could be a likely significant effect; and</li> <li>- A detailed assessment of the likely significant effects (both positive and negative) identified through the high level assessment of each regional strategy policy, presented under each Strategic Environmental Assessment topic.</li> </ul> <p>The high level assessment is presented in Appendix D in an assessment matrix covering the effects of retention and revocation of each regional strategy policy against all Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects. The commentary outlines the likely significant effects, justification for the scores given, any mitigation measures,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>assumptions and uncertainties.</p> <p>The detailed assessment is presented in Appendix E at the end of each topic chapter. The topic chapters contain information required by Annex I (b) to (g) of the Strategic Environmental Assessment Directive and are considered germane to the assessment.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 and summarised in table NTS3.</p> <p>All information is summarised in Chapters 4, and 5 of the updated Environmental Report and then further summarised in the NTS. Therefore the scorings and assessments do inform the conclusions set out in the Environmental Report, although the justification for them is set out in Appendix D and E rather than in Chapter 4 and the subsequent conclusions. For example, both Appendix D and E provide commentary on how the scores associated with the biodiversity objective in relation to Policy YH8 Green Infrastructure have been determined.</p> <p>The commentary in Appendix D and E notes that since not all areas in Yorkshire and Humber have green infrastructure strategies in place it would</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			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. In the long term, it is considered that with the direction provided by the National Planning Policy Framework significant positive effects (as with retention) will result, although the extent to which non-statutory green infrastructure strategies are implemented will be down to the duty to co-operate as discussed later in this table.
4.	The overall approach taken to Strategic Environmental Assessment – reasonable alternatives	<p><b>North Yorkshire County Council</b> consider that the report has been broadly undertaken in line with legislative requirements, although the County Council would prefer to see the mitigation proposed for each alternative summarised in the main body of the report rather than being relegated to the appendices.</p> <p>The <b>Environment Agency</b> agreed with the overall approach taken to appraise options, including the wider range of alternatives. The assessment provides an opportunity to identify significant environmental impacts of revoking the regional strategy, and options for mitigating these impacts.</p>	<p>Comments noted.</p> <p>The Government welcomes North Yorkshire County Council's statement that the updated Environmental Report has been prepared in line with legislative requirements. Their preference on the presentation of results is noted, though this does not affect the conclusions of the assessment</p> <p>The Government welcomes the comment from the Environment Agency and Hull City Council that the remaining options give suitable alternatives to the immediate and wholesale revocation of the regional strategy as originally</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p><b>Hull City Council</b> note the remaining options give suitable alternatives to the immediate and wholesale revocation of the regional strategy as originally proposed.</p>	<p>proposed.</p>
5.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p><b>North York Moors National Park Authority</b> and <b>Yorkshire Dales National Park Authority</b> stated revocation of the regional strategy will remove an important safeguard for National Parks which is not sufficiently replaced by the National Planning Policy Framework. This significant (potentially long term) negative effect on the landscape has not been identified in the report.</p>	<p>Disagree.</p> <p>Revoking the Yorkshire and Humber Regional Strategy is not considered to result in a significant adverse effect on the landscape as the National Planning Policy Framework, makes it clear that strategic priorities across local boundaries are to be properly co-ordinated and clearly reflected in individual local plans. The scale and form of development that would be considered acceptable on the boundaries of a National Park is one example of the kind of strategic planning issue that local planning authorities, including National Park Authorities, will have to work on collaboratively under the duty to co-operate.</p> <p>It is acknowledged in the assessment that the ultimate effects of revoking the Yorkshire and Humber Regional Strategy will depend on local circumstances, as local authorities will have the freedom to set their own local priorities within the policy context of the National Planning Policy Framework, and the extent to which the duty to</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>co-operate is implemented.</p> <p>The Government has also provided a response to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement which included the finding concerning issues, such as, renewable energy, biodiversity enhancement and landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p> <p>If as a result of monitoring of the effects, it became apparent that implementation had lead to significant negative environmental effects on the National Parks, the Government would consider measures to address or mitigate those effects.</p>
6.	The overall approach taken to Strategic Environmental Assessment – predetermination	<p><b>Friends of the Earth</b> question the methodology of the report which states that the new planning reform measures will deal effectively with strategic spatial issues without providing any evidence as to whether this has been the case since March 2012. Further planning reform undermines the basis on which this assessment has been made.</p> <p><b>Friends of the Earth</b> also consider that it is also key that the report ensures that impacts are</p>	<p>Disagree.</p> <p>The assessment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the Yorkshire and Humber Regional Strategy. These include:</p> <ul style="list-style-type: none"> <li>- existing legislation concerning environmental protection (such as the</li> </ul>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>understood and that issues raised are taken into account in the outcome. It is unclear how this will be addressed when the outcome seems to have already been set.</p>	<p>Habitats Directive (92/43/EEC), Water Framework Directive (2000/43/EC), the Flood and Water Management Act 2010);</p> <ul style="list-style-type: none"> <li>- existing planning policy (such as the National Planning Policy Framework and Planning Policy Statement 10);</li> <li>- other government policy (such as that articulated in the Natural Environment White Paper);</li> <li>- actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.</li> </ul> <p>In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the National Planning Policy Framework have been referenced in the individual policy assessments to provide a substantial alternative source of planning policy relevant to the Local Plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>examples of current cooperation are also cited where available. Examples where authorities have been co-operating analogous to the Duty to co-operate include the economic and environmental strategies developed by Leeds City Region, East Riding of York and Hull City Council's Sustainable Waste Management Strategy and Barnsley, Doncaster and Rotherham's Joint Waste Plan.</p> <p>In relation to Friends of the Earth's second comment, the Government announced in the Coalition Agreement its intention to "rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils". However, the intention has been subject to extended consultation (through the Strategic Environmental Assessment) and been assessed against the requirements of the Strategic Environmental Assessment Directive twice. The Government considers that although it has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>retention of each policy in the Regional Strategy and the assessment of reasonable alternatives) and the extensive consultation and consideration of consultation responses. The Government has also demonstrated that it is open to considering changes to the plan to revoke, for instance through the retention of policies where the assessment concludes that revocation could lead to significant environmental effects.</p> <p>If, as a result of monitoring of the effects it became apparent that implementation had led to significant negative environmental effects, The Government would consider measures to address or mitigate those effects.</p>
7.	Additional information that should be contained with the baseline or review of plans and programmes	<b>North Yorkshire County Council</b> notes the baseline evidence underpinning the environmental assessment does not have direct regard to the North Yorkshire Minerals Local Plan Saved Policies (2008) and Waste Local Plan Saved Policies (2009). These should be considered within the assessment of local plans and strategies.	<p>Comments noted.</p> <p>These documents were considered in the assessment. They are listed in Appendix C and in Appendix E on page 222 of the updated Environmental Report under additional considerations. It is acknowledged that North Yorkshire County Council have two Local Plans in place which deal with Minerals and Waste.</p>
8.	Whether the likely significant effects	<b>Natural England</b> considered that there will be a delay between adoption of National Planning Policy	Comments noted.

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	have been identified, described and assessed	Framework compliant local plans and the revocation of the regional strategy. An additional 30,000 homes per annum are projected to be built in Yorkshire and Humber. Many of the determination of individual planning applications (that collectively go to make up the additional dwellings approved in the region) could be made before adopted local plans are put in place.	<p>The Government has provided a response to the findings of the Strategic Environmental Assessment (Table 3.2 of this Post Adoption Statement) regarding issues of uncertainty and delay. In noting the findings of the Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the Plan to Revoke, such as those contained in the Localism Act 2011, those proposed in the Growth and Infrastructure Bill and the package of advice and support being offered to all councils, from the Local Government Association, the Planning Inspectorate and the Department.</p> <p>Existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Flood and Water Management Act 2010 – which includes a duty to co-operate) is also part of the hierarchy of measures that will apply in the short to long term in the absence of the Yorkshire and Humber Regional Strategy.</p>
9.	Reliance on the National Planning Policy Framework	<b>Natural England</b> noted the Environmental Report identified a range of networks/bodies that will continue to work across the region to deliver	<p>Comments noted.</p> <p>Nature Improvement Areas and Local Nature Partnerships already provide opportunities for</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	and the duty to co-operate	<p>specific outcomes, this includes Local Nature Partnerships and Nature Improvement Areas. They would welcome further mitigation in the short and medium term to encourage local planning authorities to take part in cross boundary partnerships, looking at environmental receptors, for example landscape, local biodiversity and habitats.</p> <p><b>Natural England</b> consider that cross boundary working is essential for tackling strategic issues relating to waste, water resources, water quality, biodiversity, landscape, climate change, flood and coastal erosion risk and environmental infrastructure planning. The finding of the Environmental Report could be used to identify where cross boundary working would be effective. Local planning authorities' local plans could then be assessed against the duty to co-operate by referring to the findings of the regional strategy revocation Strategic Environmental Assessment.</p>	<p>cross- boundary working with partners' working together to improve biodiversity through projects which can be expected also to contribute significantly to landscape conservation. There are two Nature Improvement Areas located in Yorkshire and Humber: the Dearne Valley Green Heart and the Humberhead Levels.</p> <p>The duty to co-operate underpinned by the National Planning Policy Framework enables local planning authorities along with the other bodies prescribed in regulations made under the duty to co-operate (section 33A of the Planning and Compulsory Purchase Act 2004) to strategically plan for the types of environmental infrastructure as identified by Natural England.</p>
8.	Reliance on the National Planning Policy Framework and the duty to co-operate	<p><b>Environment Agency</b> agree that the National Planning Policy Framework along with cross boundary partnerships can help enable the protection and enhancement of the environment. Achieving environmental outcomes may be more</p>	<p>Comments noted.</p> <p>Existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Flood and Water Management</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>challenging during the transitional period, between the revocation of the regional strategy and local planning authorities getting adopted local plans in place and the <b>Environment Agency</b> welcomes this recognition in the report.</p> <p><b>Environment Agency</b> supports the duty to co-operate and, as a “named party”, will provide evidence to support local planning authorities to consider cross-boundary planning issues.</p>	<p>Act 2010 – which includes a duty to co-operate) is part of the hierarchy of measures that will apply in the short to long term in the absence of the Regional Strategy.</p>
9.	<p>Reliance on the National Planning Policy Framework and the duty to co-operate - guidance</p>	<p>The <b>Environment Agency</b> considers that the planning guidance review being carried out by Lord Taylor provides an opportunity to consider the role for new guidance to support the duty to co-operate.</p> <p><b>Wildlife Trusts Yorkshire and Sheffield &amp; Rotherham</b> believe further guidance is needed on the practical implementation of the new duty to co-operate and until that is spelt out the revocation of the regional strategy will lead to significant void in strategic policy relating to many environmental issues including landscapes, biodiversity, water resources, water quality, climate change, flood risk and green infrastructure</p> <p><b>RenewableUK</b> states that the Government should provide guidance to local planning authorities on</p>	<p>Comments noted.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the duty to co-operate should be one of the priority areas on which the Government should consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and were published on 21 December for an 8 week consultation. The Government will consider the consultation responses before responding to the Group's recommendations.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		the duty to co-operate and commission research to assess how effectively the duty to co-operate is helping the delivery of national outcomes such renewable energy infrastructure.	
10.	Reliance on the National Planning Policy Framework and the duty to co-operate	<p><b>English Heritage</b> notes that since the previous consultation the National Planning Policy Framework has been published, clarifying and strengthening the historic environment within the sustainable development agenda, in particular they welcome Paragraph 7 of the National Planning Policy Framework.</p> <p><b>English Heritage</b> also note the National Planning Policy Framework lacks the specificity of the regional strategy, it embeds the historic environment within sustainable development as a core planning principle.</p> <p><b>English Heritage</b> citing Policy ENV9: Historic Environment of the regional strategy, acknowledge that the provisions of the duty to co-operate, the guidance in the National Planning Policy Framework on undesignated assets, sets out a framework for the management of heritage assets, nonetheless, they are still concerned that, in the absence of a clearly-articulated and co-ordinated strategy for heritage assets, they could be omitted</p>	<p>Comments noted.</p> <p>Paragraphs 126 – 141 of the National Planning Policy Framework illustrate the key role which local planning authorities have through the development management decisions they take and the local plans they prepare in conserving and enhancing the historic environment. English Heritage is identified as one of the bodies prescribed in regulations made under the duty to co-operate (section 33A of the Planning and Compulsory Purchase Act 2004) which local planning authorities duty to co-operate should work with when preparing their local plans. Working in liaison with local planning authorities English Heritage can promote policies, which address the preservation and enhancement of the cultural and historical assets such as historical landscapes and settlements.</p> <p>The Government notes the response made by the Theatres Trust that they consider that the revocation of regional strategies will not</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>from local plans and not receive the same level of protection that the regional strategy provided.</p> <p>The <b>Theatres Trust</b> understands that the revocation of regional strategies will not affect the retention of valuable historic and cultural assets such as theatres.</p>	negatively impact on historic and cultural assets such as theatres.
11.	Reliance on the National Planning Policy Framework and the duty to co-operate	<p><b>North Yorkshire County Council</b> consider that given the strategic nature of the regional strategy in many cases the impact of revocation or retention of the regional strategy upon the environment makes little difference, at least in the longer term given that alternative mechanisms for cross boundary strategic planning in the form of the National Planning Policy Framework and the duty to co-operate have been introduced.</p> <p><b>North Yorkshire County Council</b> notes the assumption made that the new arrangements in the form of the duty to co-operate and the National Planning Policy Framework will be able to promote cross boundary strategic planning. The County Council states that the duty to co-operate does not in itself require local planning authorities to reach agreement on strategic planning issues. Where</p>	<p>Comments noted.</p> <p>Revocation of the Yorkshire and Humber Regional Strategy does not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans. The duty to co-operate requires local authorities and other public bodies (such as Natural England and the Environment Agency) to work together constructively, actively and on an ongoing basis in relation to planning for strategic, cross-boundary matters in local and marine plans.</p> <p>The Government recognises the importance of strategic planning and the National Planning Policy Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>cooperation rather than agreement is a key part of the mitigation of the impacts of revocation of the regional strategy, it is questionable as to whether the mitigation is entirely realistic.</p> <p><b>Rotherham Metropolitan Borough Council</b> strongly supports a local approach to determining the most appropriate scale and distribution for future growth in Rotherham, they have actively sought to meet the duty to co-operate by extensive working with neighbouring authorities and relevant bodies.</p> <p><b>Friends of the Earth</b> note that the National Planning Policy Framework has been operational only since March 2012, it is difficult to see where the evidence lies for the assumption that the National Planning Policy Framework will perform in the same way as a legally adopted plan with different policies, spatial scope and containing much more contextual detail. The report also fails to recognise that the duty to co-operate will not get the local planning authorities in the region to cooperate at the same time.</p> <p><b>Wildlife Trusts Yorkshire and Sheffield &amp; Rotherham</b> expressed concern about some of the spatial policy aspects of revocation of the regional</p>	<p>individual local plans.</p> <p>This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as, planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>strategy given the lack of certainty surrounding the duty to co-operate in relations to strategic planning across administrative boundaries. They felt the duty to co-operate doesn't have sufficient force to ensure that effective cooperation will in fact occur in the absence of the regional strategy.</p> <p><b>Town and Country Planning Association</b> believe it is risky to put so much reliance as a mitigation factor on the assumption that local planning authorities will continue to work together on cross boundary strategic issues. <b>Town and Country Planning Association</b> consider that the policy reference to strategic issues in the National Planning Policy Framework and the duty to co-operate are not effective substitutes for a regionally specific policy set out in a regional strategy.</p> <p><b>RenewableUK</b> consider that the updated Environmental Report states that most issues arising from the revocation of regional strategies will be dealt with by the National Planning Policy Framework and at the local level of planning. The revocation of regional strategies and number of Planning Policy Statements means that revocation will have a detrimental effect on the deployment of onshore wind, carbon dioxide emission reductions</p>	<p>to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it</p>

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		and climate change mitigation.	<p>is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and regulations made under the 2004 Act require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The prescribed bodies are:</p> <ul style="list-style-type: none"> <li>- the Environment Agency;</li> <li>- the Historic Buildings and Monuments Commission for England (English Heritage);</li> </ul>

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			<ul style="list-style-type: none"> <li>- Natural England;</li> <li>- the Mayor of London;</li> <li>- the Civil Aviation Authority;</li> <li>- the Homes and Communities Agency;</li> <li>- Primary Care Trusts;</li> <li>- the Marine Management Organisation</li> <li>- the Office of Rail Regulation</li> <li>- the Highways Agency;</li> <li>- Transport for London;</li> <li>- Integrated Transport Authorities; and</li> <li>- Highway authorities</li> <li>- Local Nature Partnerships</li> <li>- Local Enterprise Partnerships</li> </ul> <p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p>
12.	Monitoring	<p><b>Environment Agency</b> welcomed the monitoring recommendations in the report, and those already in place to understand compliance with the duty to co-operate. They recommend closer monitoring of highly complex, cumulative effects on issues such as climate change, water quality and water resource.</p> <p><b>Town and Country Planning Association</b></p>	<p>Comment noted.</p> <p>The National Planning Policy Framework (paragraphs 126 – 141) illustrate the key role which local planning authorities have through the development management decisions they take and local plans they prepare in conserving and enhancing the historic environment. Naturally local planning authorities will wish to monitor the</p>

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		<p>welcomes the identification of proposed monitoring indicators (Table NTS4). It is unclear how this monitoring process will be undertaken except for a statement that DCLG will make “periodic references” to such matrices using certain data sources. They recommended that a clearer statement is given as to how this information will be brought together and where it will be published.</p> <p><b>Friends of the Earth</b> suggested that regular monitoring reports should be made available to all local authorities in the region, with issues of concern flagged for review in local plans.</p> <p><b>RenewableUK</b> welcomes the provisions on monitoring in the report, especially those for the</p>	<p>impact of the planning system upon the conservation and enhancement of the historic environment in their localities as well as cumulative effects on issues such as climate change, water quality and water resource. Local planning authorities must report on their performance against the duty to co-operate in their monitoring reports.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan to revoke the Yorkshire and Humber Regional Strategy are contained in this Post Adoption Statement in Chapter 6 and Annex C.</p> <p>Local planning authorities have to produce an annual monitoring report on the implementation of their local plan, this data can be used to flag up the need to review policies within their local plan. If local planning authorities working collaboratively wish to pool their resources to produce joint local plan monitoring and annual reporting mechanisms they can do so as suggested by Friends of the Earth.</p> <p>The Government notes that RenewableUK welcomes the provisions which have been made</p>

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		<p>monitoring of greenhouse gases, but the provision of renewable energy infrastructure needs to be monitored as well.</p> <p><b>English Heritage</b> supported the use of Heritage at Risk data.</p>	<p>on monitoring in the update Environmental Report and their request for provision of monitoring of renewable energy infrastructure, and from English Heritage about the use of the Heritage at Risk register.</p>
13.	Individual Topics: application of Habitats Regulation Assessment	<p><b>Natural England</b> recommended that the criteria used by the Department of Communities and Local Government in the Habitats screening process should be included in the Post Adoption Statement for the Strategic Environmental Assessment, in order to demonstrate that European protected habitats have been considered and are an important part of the evaluation process.</p>	<p>Comment noted</p> <p>Section 1.4 of the updated Environmental Report addresses the requirements of the Habitats Directive (92/43/EEC) and concludes that the ‘the Government’s view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive’. This conclusion was reached on the basis of a screening exercise: each Regional Strategy policy was reviewed to identify those that referred to the protection of European sites and those which are locationally specific – i.e. they direct development to a particular parcel of land. Policies that were more pervasive in nature or provided a more general requirement for a local planning authority to make provision for a certain type or amount of development, were screened out at that stage, as it is for each local planning authority to decide on a response to the pervasive policies and determine the most</p>

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			<p>suitable locations for the development – taking account, where necessary, of the finding of their own Habitats Regulations Assessment.</p> <p>This exercise identified a number of policies in the Yorkshire and Humber Regional Strategy which sought to avoid effects on European sites. These policies were generally included as mitigation for development that the Strategy itself encouraged. They were therefore considered further in order to determine whether it could be concluded that their revocation would not have adverse effects on such sites. Consideration was given, among other things, to the fact that: (i) the 'development policies' in the Regional Strategy they seek to mitigate would cease to apply were the Strategy to be revoked; and (ii) that the Conservation of Habitats and Species Regulations 2010 require that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive. This exercise did not identify any likely significant effects on European sites.</p> <p>This conclusion was supported by the findings of the Strategic Environmental Assessment. Unlike the Habitats Regulations Assessment screening,</p>

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			<p>which considered the relative effects of revocation compared to retention, the Strategic Environmental Assessment considered the absolute effects (and is perhaps a tougher test as a consequence). The Strategic Environmental Assessment assessed the likely effects of the revocation of the strategy, and the likely effects of retaining the strategy (and a number of reasonable alternatives involving partial revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which include biodiversity, fauna and flora). The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. The guidance on a significant effect for biodiversity includes reference to negative and sustained effects on European or national designated sites and/or protected species. No significant negative effects on biodiversity were found, nor were any significant negative effects found from reasonable alternatives. Monitoring measures have been proposed for the effects on</p>

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			<p>biodiversity (as well as the other topics) to help review the effects of the decision.</p> <p>The Secretary of State is therefore proceeding on the basis that the Plan to Revoke the Yorkshire and Humber regional strategy is not likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects).</p>
14.	Individual Topics: minerals and waste management	<p><b>Environment Agency</b> suggest that it would be helpful for the replacement for Planning Policy Statement 10 (waste management) to consider the value of retaining the partnership mechanism provided by Regional Technical Advisory Boards.</p> <p><b>Hull City Council</b> considered that it would be helpful if some waste data not readily available at a less than regional level were retained.</p>	<p>Comments made by the Environment Agency and Hull City Council are noted. The Government aims to consult on the revision of Planning Policy Statement 10 in Spring 2013. Waste planning authorities are already able to work with other authorities to capture data covering more than one waste planning authority area. Additionally, the national Planning Policy Framework makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p>

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		<p><b>North Yorkshire County Council</b> consider that with the revocation of the regional strategy, uncertainty will arise from the absence of apportionment figures and therefore how the need to ensure the national requirement to maintain an adequate and steady supply of minerals to support development can be met. This uncertainty could be addressed by retaining the regional strategy for a transitional period of 2 to 3 years.</p> <p><b>North York Moors National Park Authority</b> and <b>Yorkshire Dales National Park Authority</b> request that Part C3 of Policy ENV4 (Minerals) should be retained because it seeks a progressive reduction</p>	<p>Disagree.</p> <p>Paragraph 145 of the National Planning Policy Framework, which retains the Managed Aggregates Supply System to deliver a steady and adequate supply of aggregate, requires mineral planning authorities to prepare local aggregate assessments based on a rolling supply average of 10 years sales and other data. National and sub-national guidelines will still be published by the Department but as an indication of the total amount of aggregate provision that the Mineral Planning Authorities, collectively within each Aggregate Working Party, should aim to provide. These guidelines will also provide individual Mineral Planning Authorities, where they are having difficulty in obtaining data, with some understanding or context of the overall demand and possible sources that might be available in their Aggregate Working Party area.</p> <p>Disagree.</p> <p>Section 62 of the Environment Act 1995, which inserts a new section 11A into the National Parks and Access to the Countryside Act 1949, creates</p>

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		<p>in aggregate production from National Parks and Areas of Outstanding Natural Beauty, noting that there is no strategic justification for the provision of new crushed rock sites within these areas during the life of the Yorkshire and Humber Regional Strategy.</p>	<p>a statutory duty on National Park Authorities – and on other ‘relevant authorities’, which include all public bodies and therefore all local authorities - to have regard to the purposes of designation when exercising or performing any functions in relation to, or so as to affect, land in a National Park. In fulfilling this duty local planning authorities should take account of the National Planning Policy Framework, which states that the planning system should protect and enhance valued landscapes, and that great weight should be given to conserving landscape and scenic beauty in National Parks.</p> <p>Turning to local plan-making the Government recognises the importance of strategic planning and the National Planning Policy Framework also makes it clear that strategic priorities across local boundaries are to be properly co-ordinated and clearly reflected in individual local plans. The scale and form of minerals development that would be considered acceptable in a National Park is one example of the kind of strategic planning issue that local planning authorities will have to work on collaboratively under the duty to co-operate.</p>

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			<p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans. Authorities are required to demonstrate how they have complied with the duty as part of the independent examination of local plans.</p> <p>In addition, paragraph 144 of the National Planning Policy Framework makes it clear that, as far as is practical, planning authorities should provide for the maintenance of landbanks of non-energy minerals from outside National Parks.</p> <p>If as a result of monitoring of the effects, it became apparent that implementation had led to significant negative environmental effects on the National Parks, the Government would consider measures to address or mitigate those effects.</p>

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15.	Individual Topics: Flood Risk	<b>Environment Agency</b> welcomed the reference to the Flood Risk Regulations 2009 which place a duty on the Environment Agency and Lead Local Flood Authorities to work together to determine whether there are significant flood risks in an area and prepare flood hazard maps.	<p>Comment noted.</p> <p>The Government welcomes the Environment Agency's comment that the Environmental Report made reference to the important work of the Lead Local Flood Authorities.</p> <p>The National Planning Policy Framework contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the provision of infrastructure for flood risk and coastal change management.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant obligations under European law – which include, for example, obligations under the Floods Directive (2007/60/EC).</p>
16.	Individual Topics Water	<b>Environment Agency</b> welcomes the reference to the relevant River Basin Management Plans that will help minimise detrimental effects on the	<p>Comment noted.</p> <p>The Government welcomes the Environment</p>

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	Management and Water efficiency	<p>ecological status of water bodies in the region. In the absence of a strategic steer from a regional strategy they suggest that mechanisms are put in place to build and maintain knowledge of water management issues for local planning authority planners.</p> <p><b>Environment Agency</b> also support recognition within the updated Environmental Report (Appendix D) that the regional strategy encourages sustainable management of water resources. However, increased demand from population growth along with impacts of climate change will mean that local planning authorities will have a more significant role to play in managing water resources.</p>	<p>Agency's comment that the Environmental Report highlights the important role of River Basin Management Plans and that local planning authorities have a significant role to play in planning for managing water resources.</p> <p>The National Planning Policy Framework is clear that local planning authorities should work with other bodies to assess the capacity of water supply and wastewater treatment infrastructure, and should set out in the Local Plan their strategic priorities and policies for the provision of such infrastructure.</p> <p>More generally, the National Planning Policy Framework tells local planning authorities to adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also</p>

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			clearly states that planning policy decisions must reflect and where appropriate promote relevant obligations under European law – which include, for example, obligations under the Water Framework Directive (2000/60/EC).
17.	Individual Topics Biodiversity	<b>Environment Agency</b> welcomes the commentary in the report about Local Nature Partnerships and Biodiversity Action Plan Partnerships for promoting green infrastructure networks. It would be helpful if for a list of existing Local Nature Partnerships which exist in the region to be provided.	Comments noted.  In Yorkshire and Humber there are two Nature Improvement Areas: the Dearne Valley Green Heart and the Humberhead Levels  There are also five Local Nature Partnerships in the Yorkshire and Humber region, these are: <ul style="list-style-type: none"> <li>- Hull and East Riding;</li> <li>- Humber Estuary;</li> <li>- North Yorkshire and York;</li> <li>- South Yorkshire; and</li> <li>- Yorkshire West</li> </ul>
18.	Individual Topics: York Green Belt	<b>English Heritage</b> support the retention of Policy YH9: Green belts from the Yorkshire and Humber Regional Strategy until the City of York adopt a new local plan defining the inner boundary of York's	Comment noted.  The Government notes the eight representations received requesting that policies which relate to the Green Belt around the City of York be

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		<p>Green Belt. <b>North Yorkshire County Council</b> supports the retention of Policy YH9, which can be achieved by retaining the regional strategy for a transitional period of 2 to 3 years. <b>Rotherham Metropolitan Borough Council</b> support the retention of policies that provide a statutory basis for the York Green Belt in order to give the local authority time to adopt a York Green belt boundary in their local plan. <b>City of York Council</b> request the retention of part C of Policy YH9, excluding reference to taking account of levels of growth set out in the regional strategy, parts C1 and C2 of Policy Y1: York sub area policy and the Key Diagram of the Yorkshire and Humber Plan (2008) for up to 5 years or until York adopts its new local plan (which ever is the earliest) it is currently preparing, so as to safeguard the historic setting of York. <b>Fulford Parish Council</b> also requests the retention of part C of Policy YH9 and parts C1 and C2 of Policy Y1. <b>Strensall and Towthorpe Parish Council</b> request retention of policies that define the green belt around York, supported by Mr Julian Sturdy MP, until the City of York Council provide a local plan. The <b>Yorkshire Local Councils Association</b> also support the retention of policies that define the York Green belt until York adopts an</p>	<p>retained until the City of York Council prepare and adopt their local plan clearly defining the inner boundary of the Green Belt.</p> <p>The Government also notes the two representations received which made the case for revoking these policies. Likewise the Government notes the two representations which support the retention of York's Green Belt, but ask that the Government saves an "unadopted Local Plan 2005", which is not apart of the Yorkshire and Humber Regional Strategy and therefore has not been subject to the environmental assessment carried out.</p> <p>The Government intends to retain certain policies set out in the Regional Spatial Strategy which relate to the York Green Belt. The detail and reasons for this decision are set out in Chapter 5 of this Post Adoption Statement.</p>

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		<p>up to date local plan. <b>Town and Country Planning Association</b> also support the retention of part C of Policy YH9 and Parts C1 and C2 of Policy Y1 and the relevant parts of the associated Key Diagram in order to give spatial expression to the Green Belt around York until and up-to-date local plan is in place.</p> <p>Whilst <b>Heslington Village Trust</b> and <b>Mr Richard Frost</b> stated that saving Policy YH9 was not enough to protect York's Green Belt and that the unadopted Local Plan 2005 which defines the boundaries of the York Green Belt should be saved until York adopts a new local plan.</p> <p><b>Persimmon Homes</b> and <b>Jennifer Hubbard (Planning Consultant)</b> made the case for revoking the whole of the Yorkshire and Humber Regional Strategy including policies that define the York Green Belt. Jennifer Hubbard considered that it is not necessary to save Policy YH9 and if saved it would result in the City of York Council taking longer to prepare their local plan and finally settle the issue of York's Green Belt inner boundary. Persimmon Homes also considered that the Green Belt as defined in the regional strategy negatively impacts upon York's housing markets and encourages more unsustainable commuting into</p>	

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		York as people have to "leap frog" the Green Belt to access affordable housing. They considered that revocation of the York Green belt policies will not result in a significant negative effect in the short term.	
19.	Individual Topics: Transitional arrangements	<b>North Yorkshire County Council</b> welcomes the report, but the County Council continues broadly to support the strategic approach developed and set out in the regional strategy. They wish to see the retention of the Yorkshire and Humber regional strategy for a transitional period of 2 to 3 years to provide a coherent framework within which local planning authorities can prepare their local plans whilst the duty to co-operate is embedded.	Disagree.  The Government does not consider that retaining the whole of the Yorkshire and Humber Regional Strategy for a transitional period of 2 to 3 years for the reasons set out by North Yorkshire County Council is necessary because the duty to co-operate has been in place since March 2012 and is underpinned by the National Planning Policy Framework. The duty provides a robust vehicle for local planning authorities and other bodies prescribed under the duty to deliver cross-boundary strategic planning where needed.
20.	Individual Topics: Housing numbers	<b>North Yorkshire County Council</b> , whilst advocating the retention of the regional strategy for a transitional period, states that given the evidence that supports the specific housing numbers contained in the regional strategy is now out of	Comments noted.  The National Planning Policy Framework and the duty to co-operate address this issue. The National Planning Policy Framework makes it clear that local planning authorities, including

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		<p>date, it is accepted that they will need reviewing.</p> <p><b>Rotherham Metropolitan Borough Council</b> consider that a locally led approach will ensure that in the long term, development planning in respect to housing and employment allocations could take account of more detailed understanding of the local environmental capacity issues.</p> <p><b>North York Moors National Park Authority</b> and <b>Yorkshire Dales National Park Authority</b> consider that the report does acknowledge that the regional strategy, specifically states that no housing provision figures are given for National Parks as well new housing within the National Parks should be to meet local needs only, a policy position which is reflected in the DEFRA National Parks 2010 Circular. In contrast the National Planning Policy Framework requires local planning authorities to meet the full objectively assessed needs for market and affordable housing, as far as is consistent with other policies in the Framework. They thought the report could usefully state that these effects could be avoided through agreements between local planning authorities in and around designated areas that these will not be suitable locations for meeting general housing needs.</p>	<p>National Park Authorities, should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework, including clear policies protecting National Parks. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess</p>

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			<p>whether the plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>
21.	Individual Topics: Green Infrastructure	<b>North Yorkshire County Council</b> states in the absence of the regional strategy particularly Policy YH8 (Green Infrastructure) the assessment does not suggest mitigation measures sufficient to guarantee that planning for Green Infrastructure will	Disagree.  The Government does not consider that retaining the whole of the Yorkshire and Humber Regional Strategy for a transitional period of 2 to 3 years for the reasons set out by North Yorkshire County

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		<p>be effective across political boundaries. The retention of the regional strategy for a 2 to 3 year transitional period, would allow local planning authorities to bring forward local plans with policies to promote Green Infrastructure in line with Policy YH8 (Green Infrastructure).</p>	<p>Council is necessary because the duty to cooperate has been in place since March 2012 and is underpinned by the National Planning Policy Framework. As illustrated in Table 3.2 of this Post Adoption Statement, the duty provides a robust vehicle for local planning authorities and other bodies identified under the duty to deliver cross-boundary strategic planning where needed.</p> <p>The National Planning Policy Framework makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provide net gains in biodiversity where possible, and contribute to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures.</p> <p>Nature Improvement Areas already provide opportunities for cross-boundary working, with partners' working together to improve biodiversity through projects that can also be expected to contribute significantly to landscape conservation. There have initially been designated 12 Nature Improvement Areas in England, the Yorkshire and Humber region hosts two Nature Improvement Areas: Dearne Valley Green Heart</p>

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			<p>and the Humberhead Levels. The National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships (five of which exist in Yorkshire and Humber) to assess existing and potential components of ecological networks.</p> <p>The National Planning Policy Framework states that local plans should contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. The National Planning Policy Framework also asks that, in order to minimise impacts on biodiversity and geodiversity, planning policies should: “plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.”</p>
22.	Individual Topics: Saving Policies	<b>Hull City Council</b> consider that Policies YH1(Overall Approach and Key Spatial Priorities),	Disagree. The Government does not consider that retaining

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	<p>YH1 (Overall Approach and Key Spatial Priorities), YH4 (Regional Cities and Sub-Regional Cities and Towns) and HE1 (Humber Estuary sub area policy)</p>	<p>YH4(Regional Cities and Sub- Regional Cities and Towns) HE1(Humber Estuary sub area policy) and the non spatial policies of the Yorkshire and Humber Regional Strategy should be saved until local plans are in place and the duty to co-operate and National Planning Policy Framework are embedded.</p> <p><b>Town and Country Planning Association</b> consider that the regional strategy identified priority locations for housing and economic development within an overarching aim of urban renaissance set out in Policies YH1(Overall Approach to Key Spatial Priorities) and YH4(Regional Cities and Sub-</p>	<p>the Policies YH1(Overall Approach and Key Spatial Priorities), YH4 (Regional Cities and Sub Regional Cities and Towns) HE1(Humber Estuary sub area policy) and the non spatial policies of the Yorkshire and Humber Regional Strategy for a transitional period until local planning authorities have put in place up to date Local Plans as suggested by Hull City Council is necessary because the duty to co-operate has been in place since March 2012 and is underpinned by the National Planning Policy Framework. As illustrated in Table 3.2 of this Post Adoption Statement the duty provides a robust vehicle for local planning authorities and other bodies identified under the duty to deliver cross-boundary strategic planning which can cover spatial and non spatial planning policies where needed.</p> <p>Section 2.4 of the updated Environmental Report describes the reasonable alternatives considered (and their source, whether government proposed or from consultee responses to the initial Environmental Report). The reasonable alternatives include retention, revocation and partial revocation. Section 2.4.1 and 2.4.2</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Regional Cities and Towns). They thought that the possible retention of these policy objectives was not assessed as one of the partial revocation options.</p>	<p>present the reasons for the selection of those reasonable alternatives to be assessed. Retention of Policies YH1(Overall Approach to Key Spatial Priorities) and YH4(Regional Cities and Sub-Regional Cities and Towns) has been considered in the assessment under the alternative of partial revocation</p>
23.	<p>Individual Topics: Setting of the National Parks</p>	<p><b>North York Moors National Park Authority</b> and <b>Yorkshire Dales National Park Authority</b> submitted a combined representation. They considered that in the absence of the regional strategy there will be no "buffer zone" around the boundaries of the National Parks leading to development coming up to the National Parks boundaries and undermining the environmental quality of the National Parks and their settings.</p> <p>They consider that the revocation of the regional strategy will remove an important safeguard for National Parks which is not sufficiently replaced by the National Planning Policy Framework. This significant (potentially long term) negative effect on the landscape has not been identified in the report.</p> <p><b>North York Moors National Park Authority</b> and <b>Yorkshire Dales National Park Authority</b> considered that the duty to co-operate is not a Duty</p>	<p>Disagree.</p> <p>Local planning authorities responsible for areas bordering National Park boundaries must have regard to section 62 of the Environment Act 1995, which inserts a new section 11A into the National Parks and Access to the Countryside Act 1949. This provision creates a new statutory duty, not only on National Park Authorities but also other 'relevant authorities' - which include all public bodies and therefore all local authorities - to have regard to the purposes of designation when exercising or performing any functions in relation to, or so as to affect, land in a National Park. In fulfilling this duty local planning authorities should take account of the National Planning Policy Framework, which states that the planning system should protect and enhance valued landscapes, and that great weight should be</p>

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		<p>to Agree and many local authorities bordering National Parks will have different priorities and pressures to site development close to National Parks which unlike World Heritage Sites do not have recognised settings or buffer zones. They requested that consideration should be given to the retention of policies which aim to safeguard the setting of the National Park (i.e. policies part E of C1, part C of RR1 (Remoter Rural Areas) and part A of ENV10 (Landscape)</p> <p>The duty to co-operate aspect of the Localism Act has effectively weakened the planning role of National Park Authorities with joint structure plan powers and subsequently legal recognition at a regional planning level by virtue of section 4(4) of the Planning and Compulsory Purchase Act 2004. To ensure that this policy gap is avoided, consideration should be given to retaining these elements of the regional strategy Policy ENV10 (Landscape) which aim to safeguard the setting of National Parks.</p> <p>The National Park Authorities will look to work with adjoining local planning authorities to ensure appropriate policies are in place, but reference to the importance of this within the Strategic Environmental Assessment would reinforce this</p>	<p>given to conserving landscape and scenic beauty in National Parks. Moreover, National Park Authorities are a statutory consultee on planning applications that could affect a National Park. They should respond, setting out their case, if they consider that any impacts would compromise the purposes of National Park designation.</p> <p>Turning to local plan-making the Government recognises the importance of strategic planning and the National Planning Policy Framework also makes it clear that strategic priorities across local boundaries are to be properly co-ordinated and clearly reflected in individual local plans. The scale and form of development that would be considered acceptable on the boundaries close to a National Park is one example of the kind of strategic planning issue that local planning authorities, including National Park Authorities, will have to work on collaboratively under the duty to co-operate.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and</p>

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		position.	<p>deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies.</p> <p>The duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such it may be found unsound.</p>

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			<p>As a further check, the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and regulations made under the 2004 Act require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities, including National Park Authorities, to include a wide range of bodies that are critical to local plan making. The prescribed bodies are:</p> <ul style="list-style-type: none"> <li>- the Environment Agency;</li> <li>- the Historic Buildings and Monuments Commission for England (English Heritage);</li> <li>- Natural England;</li> <li>- the Mayor of London;</li> <li>- the Civil Aviation Authority;</li> <li>- the Homes and Communities Agency;</li> </ul>

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			<ul style="list-style-type: none"> <li>- Primary Care Trusts;</li> <li>- the Marine Management Organisation</li> <li>- the Office of Rail Regulation</li> <li>- the Highways Agency;</li> <li>- Transport for London;</li> <li>- Integrated Transport Authorities; and</li> <li>- Highway authorities</li> <li>- Local Nature Partnerships</li> <li>- Local Enterprise Partnerships</li> </ul> <p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning Policy Framework states that local planning authorities should set out the strategic priorities for their area in their Local Plan. Those local authorities within the parts of the former Coastal and Remoter Rural sub-areas adjacent to the National Parks should set out a scale and form of development that would be considered acceptable on the boundaries of a National Park, having regard to national planning policy and the duty under section 62 of the of the Environment Act 1995 explained above. Other priorities could include the conservation and enhancement of the natural</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			and historic environment, including protection of the landscapes which border the boundaries of National Parks.
24.	Individual Topics: Renewable energy generation and Climate Change	<p><b>RenewableUK</b> consider that the loss of regional strategies will not be helpful in meeting the challenge of Climate Change and will affect the speed and effectiveness of reducing carbon dioxide emissions and renewable energy deployment at the local level. This will have an effect on the environment and human health and wellbeing.</p> <p>The removal of valuable information and guidance contained in Planning Policy Statement 22 on Renewable Energy is also affecting the ability of local planning authorities to plan for renewable energy infrastructure.</p> <p><b>RenewableUK</b> consider that removal of Policy YH2 (Climate Change and Resource Use) of the Yorkshire and Humber Regional Strategy will mean that local planning authorities have nothing to work towards on a local level to deliver renewable energy infrastructure and raise concerns about the application of local policies. They also note there has been no guidance from Government on how national targets need to be transferred and applied locally. Therefore Policies YH2 (Climate Change</p>	<p>Disagree.</p> <p>The Government does not believe that retaining the Policies YH2(Climate Change and Resource Use) and ENV5(Energy) is necessary because it will be for local planning authorities to determine local responses to the issue of renewable energy generation consistent with the National Planning Policy Framework.</p> <p>The National Planning Policy Framework includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>and Resource Use) and ENV5 (Energy) of the Yorkshire and Humber Regional Strategy should be saved.</p> <p><b>Town and Country Planning Association</b> consider that the retention of Policy ENV5 (Energy) setting out both regional and sub regional targets for renewable energy generation should have been assessed. This policy provided a clear framework for local planning authorities.</p> <p><b>EDF Energy</b> recognise the valuable role that smaller infrastructure will play in meeting the Government’s statutory energy and climate change objectives.</p>	<p>and associated infrastructure.</p> <p>The National Planning Policy Framework also contains a number of policies aimed at encouraging the development of renewable energy installations including that local planning authorities should : “have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.” In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p> <p>Other measures that local authorities will need to</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.</p> <p>Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>The Government has also provided a response to the findings of the Strategic Environmental Assessment in Table 3.2 of this Post Adoption Statement which included the finding concerning issues, such as, renewable energy, biodiversity enhancement and landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p>

# ANNEX C

## Monitoring Indicators

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

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

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

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

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

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