

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

## Environmental Report



AMEC Environment & Infrastructure UK Limited

July 2012

This Environmental Report is a consultation document on the likely significant environmental effects of revocation of the East of England Plan and the Regional Economic Strategy (which together form the regional strategy in force for the East of England). **Responses on any aspect of the report are invited by Thursday 20 September 2012.**

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

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

Responses and comments about this consultation may be sent by email to:

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## Non Technical Summary

This **Non-Technical Summary** presents the findings of the **Strategic Environmental Assessment (SEA) of the plan to revoke the East of England Regional Strategy** contained in the accompanying Environmental Report. The following sections:

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

### The Plan to revoke Regional Strategies

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions.

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

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

### The East of England Regional Strategy

The East of England Regional Strategy combines the contents of the **East of England Regional Spatial Strategy** and the **East of England Regional Economic Strategy**.

The **East of England Regional Spatial Strategy** (published as the East of England Plan in 2008) was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the region for 15 to 20 years. In particular, it has sought to reduce the region’s impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth up to and beyond 2021. It includes policies to address housing, environmental protection, transport and other infrastructure, economic development, agriculture, minerals, energy and waste, as well as sub-regional policies.

The key ambition of the East of England Plan is to allow the region to accommodate higher levels of growth in sustainable ways by focussing development at the region’s cities and other significant urban areas, including some market towns. These are referred to as ‘key centres for development and change’. The East of England Plan sets out the need for selective reviews of Green Belt boundaries to meet development needs, including at Stevenage, Harlow and Luton. It requires local planning authorities to provide at least 508,000 net additional dwellings over the period 2001 to 2021.

**Figure NTS 1 The East of England area covered by the East of England Plan**



The Plan contains:

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

In total there are 13 policy areas. Further details of the individual policies are set out in **Appendix A**.

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

- Enterprise;
- Innovation;
- Digital Economy;
- Resource Efficiency;
- Skills for Productivity;
- Economic Participation;
- Transport;
- Spatial Economy.

It is intended to ensure that 'those responsible for economic decision-taking are working effectively together, with common goals and accepted priorities for regional development'. The RES was developed with regional partners and was subject to a formal consultation and SEA process.

There is a strong and complementary relationship between the East of England Plan and the East of England RES:

- they share an understanding of the spatial priorities of the region, particularly around the key centres of development and change. The RES adds an economic analysis of the scale and roles of key centres for development and change.
- the East of England Plan includes policies to support economic diversity and business development that support the priorities outlined in the Regional Economic Strategy.
- the headline regional ambitions in the RES are consistent with the housing supply targets in the East of England Plan.
- there are shared objectives in the two strategies covering housing, infrastructure and regeneration.
- both the Regional Economic Strategy and East of England Plan have been prepared in accordance with the region's sustainable development priorities, and the underlying principles in the Regional Economic Strategy are consistent with the emerging Integrated Sustainability Framework (ISF).

The relationship between the RES and the East of England Plan is set out in more detail in **Appendix H**.

## Strategic Environmental Assessment (SEA) of the Plan to revoke the East of England Regional Strategy

SEA became a statutory requirement following the adoption of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The objective of SEA, as defined in Directive 2001/42/EC is: *'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development'*.

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

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

strong measures for local co-operation.<sup>1</sup> In addition, in a judgement<sup>2</sup> by the Court of Justice of the European Union (CJEU), the Court held that ‘...in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment’. Following this judgement, the SEA Directive now applies to a procedure for the total or partial revocation of a land use plan. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent CJEU case law, to update and build on the assessments which were described in the previous Environmental Reports. This assessment is the result in relation to the revocation of the East of England Regional Strategy - it is a stand-alone document and there is no requirement to refer back to the previous report on the revocation of the East of England Regional Strategy published on 20<sup>th</sup> October 2011.

## The East of England environment

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

**Table NTS 1 Summary of State of the Environment in the East of England**

SEA Topic	Summary of the Environment and Key Characteristics in the East of England
<b>Biodiversity and Nature Conservation</b> (which includes flora and fauna, and the functioning of ecosystems)	<p>The East of England hosts 33 Special Areas of Conservation, 25 Special Protection Areas and 19 Ramsar sites as listed in <b>Appendix G</b>. These sites are subject to the highest level of protection.</p> <p>Sites of Special Scientific Interest (SSSIs) cover around 200,000 hectares of the region (around 7%). SSSI condition has improved significantly over recent years. In May 2012, 199,000 ha (94.19%) of this area was ‘favourable’ or ‘recovering’ condition. This compares with 79% in 2006.</p> <p>Biodiversity interest in the East of England is dominated by coastal and wetland landscapes, but there are notable areas of woodland and the open grassland, heathland and agricultural landscapes of the Brecks.</p>
<b>Population</b> (including socio-economic effects and accessibility)	<p>In 2010, over 5.8 million people were living in the Eastern region, which represents 11% of the English total. Locally, Central Bedfordshire, Luton and Colchester had the largest populations in 2010.</p> <p>Between 2000 and 2010 the population of the East of England grew by 9%, the fastest growth rate of all the English regions. The population increase was the result both of natural change and net inward migration.</p> <p>There has been a steady year-on-year increase in housing delivery in the East of England and the number of net additional dwellings per annum rose from 17,900 in</p>

<sup>1</sup> S110 of the Localism Act 2011 Duty to cooperate in relation to planning for sustainable development

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

SEA Topic	Summary of the Environment and Key Characteristics in the East of England
	<p>2001/2 to 26,800 in 2007/8. However as the economy entered recession in 2008, the number of net additions in the region fell by 39% over a two year period. In 2010/11 it had begun to rise slightly.</p> <p>Economically, the East is one of the most successful regions in the country. It had the third highest Gross Value Added (GVA) per head of any region in 2010. However, the economy in the East was hit hard by recession in 2009, with total GVA falling more than 3%.</p>
<b>Human Health</b>	<p>At 79.6 years, male life expectancy at birth in the region is a year longer than the England average. Female life expectancy at birth is 83.2 years is also higher than the nationwide average. The death rate in the region was 8.9 per 1,000 population in 2009, the same as across England as a whole.</p> <p>The East of England has the second lowest number of crimes recorded per 100,000 population of any region in England and the rate of crime committed against households was close to the national average.</p> <p>Along with the South East, the East of England contains the largest proportion of the least deprived areas of any region; however, it is also home to the most deprived of all areas in England.</p>
<b>Soil and Geology</b> (including land use, important geological sites, and the contamination of soils)	<p>The East of England has the highest proportion of high quality agricultural land in the country, as nearly the entire region is covered by Grade 1, 2 or 3a land.</p> <p>The Environment Agency estimated in 2011 that there was 5,700ha of brownfield/contaminated land in the region is either derelict, vacant or is in use with the potential for development.</p>
<b>Water Quality and Resources</b> (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	<p>The East of England region is predominantly located within the Environment Agency's Anglian River Basin District, with the more southern parts within the Thames River Basin District. Within these two River Basin Districts, there 14 river catchment areas (10 in the Anglian District and 4 in the Thames District) located within the East of England. Large estuaries include the Wash Embayment, Orwell, Colne and Blackwater. 33% of estuaries currently achieve at least good biological status.</p> <p>Much of the coastline is afforded national and international protection for the important habitats and species present, or the landscape and heritage value. The estuaries support internationally important numbers of birds visiting the wetland habitats such as saltmarsh and intertidal mudflats.</p> <p>The main aquifers in the Anglian Basin are the Chalk and Lincolnshire Limestones.</p> <p>Groundwater is used for public water supply, industry and agriculture across the river basin and is under significant pressure from diffuse pollution. This is manifest principally as nitrate, phosphates, herbicides and pesticides.</p> <p>The East of England is also one of the most water-stressed regions receiving only 71% of the national average rainfall per annum. In 2009-10, an average of 147 litres of water/day/person was consumed, compared to the industry average of 146 litres/person/day.</p>
<b>Air Quality</b>	<p>Air quality in the East of England is relatively good with an average air quality index score of less than 3 (1-3 is good; 4-6 is moderate; 6-9 is poor; and 10 is bad) but it is slowly deteriorating.</p> <p>There are growing pressures on air quality in particular locations, most notably due to the increasing traffic across the region.</p>
<b>Climate Change</b> (including greenhouse gas emissions, predicted effects of climate change)	<p>In 2009, the East of England's net emissions of CO<sub>2</sub> (by end user) were estimated to be 40.7 million tonnes, giving an estimate of 7.0 tonnes of CO<sub>2</sub> emissions per capita. This compared to emissions of 45.3 million tonnes, giving an estimate of 8.2 tonnes of CO<sub>2</sub></p>

SEA Topic	Summary of the Environment and Key Characteristics in the East of England
and the ability to adapt)	<p>emissions per capita in 2005.</p> <p>Large areas of the region are at or below sea level and 20% of the region is within the flood zone. The East of England is particularly vulnerable to the effects of storm surges, sea level rise and saline intrusion.</p>
<b>Waste Management and Minerals</b>	<p>The most common mode of disposal is landfill although at 40% lower than in 2001 there is clear downwards trend (reflecting progress towards the Landfill Directive targets).</p> <p>Sand, gravel, chalk and brick clay are extracted within the region.</p>
<b>Cultural Heritage</b> (including architectural and archaeological heritage)	<p>The region is home to 57,643 listed buildings (15% of the England total), 1,741 listed Grade I and 3,421 listed Grade II* buildings (17% of the national total). In 2007, 1.7% of Grade I and II* buildings were deemed at risk, the lowest proportion of Grade I and II listed buildings at risk of any region. There are a host of towns and cities with important medieval cores.</p> <p>The East of England has over 18,000ha of ancient woodland, an important cultural asset.</p>
<b>Landscape and Townscape</b>	<p>The East of England is generally low-lying and much of the fens and central lowlands are at or below sea level. The region is dominated by large-scale expansive landscapes. Much of the region is very rural with a dispersed settlement pattern of small towns and villages.</p> <p>The East of England is home to several landscapes of national importance including the Norfolk and Suffolk Broads National Park and four AONBs: the Norfolk Coast AONB; the Suffolk Coast and Heaths AONB; the Dedham Vale AONB; and a small area of the Chilterns AONB. Together, these areas account for 7.5% of the region's land area. The region's two stretches of Heritage Coast comprise a substantial proportion of the Norfolk Coast and Suffolk Coast and Heaths AONBs and 24% of the region's total length of coastline.</p>

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

The evolution of the environmental baseline is likely to include the following changes:

- an increase in pressures on biodiversity from the levels of housing and employment growth;
- a growth in the population by 10% reaching a total of 6.4 million by 2023;
- a growth in the number of households living in the region to 2.9 million by 2023;
- an increase in the demand for water by up to 200 megalitres per day (MI/d) by 2025, compared with the current maximum resources available of 1,800MI/d;
- hotter and drier summers and warmer and wetter winters (based on predictions for the effects of climate changes in the 2080's for the region);
- a rise in sea level from climate change leading to coastal change and habitat loss.

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

## The relationship of the Plan to revoke the East of England Regional Strategy with other policies, plans and programmes

Consistent with the SEA Directive requirements, this assessment has identified and reviewed other relevant policies, plans and programmes at an international (European), national, regional and local level. The review has identified how these other policies, plans and programmes could influence the plan to revoke the regional strategy. It also identifies how the plan to revoke could contribute to the achievement of any environmental or sustainability objectives set out in these other policies, plans and programmes. Of particular relevance is the National Planning Policy Framework, as well as the 47 Local Plans and 10 Plans that contain mineral and waste policies in the region. The relevant policies from the Local Plans and Mineral and Waste Plans are presented in **Appendix C**.

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

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

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

## Which environmental topics has the Plan to revoke the East of England Regional Strategy been assessed against?

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

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

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

## What reasonable alternatives were identified and assessed?

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

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

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

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

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

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

## What are the likely significant effects of the Plan to revoke the East of England Regional Strategy and the reasonable alternatives?

The assessment of the revocation of the East of England Regional Strategy has shown that **there will be significant positive environmental effects**, although these will be largely similar to those if the Regional Strategy were retained.

The only area where revocation of the Regional Strategy would lead to **significant negative effects is in relation to water resources** arising from development associated with policies for housing and employment provision. It should be noted that a similar policy performance is recorded for the retention alternative. The region is the driest in the country and securing adequate water supply is already a challenge with resources declining. However the effects are likely to be minimised as far as possible through Anglian Water's water resource management planning, the Environment Agency's river basin management and the application of policies in the NPPF and elsewhere which are designed to secure efficient water usage.

**For the majority of policies, it is difficult to identify clear differences** between the effects of retention and revocation. This reflects the broad strategic nature of the Regional Strategy policies and the degree to which responsibilities are already devolved to local authorities to reflect the principles in their Local Plans. It also reflects the provisions of the NPPF which mean that the basic framework for the delivery of sustainable development is in place and which are also compatible with the sustainable development principles employed in the East of England Regional Strategy.

**Where it occurs, differences between retention and revocation are most clear in respect of housing and employment allocations.** Whilst the benefits to communities of housing and employment opportunities and the impacts on biodiversity, air quality, soils, water and material assets will be similar, a locally-led approach could ensure that the adverse effects are more effectively mitigated. This could be through a more detailed understanding of local environmental capacity issues and possibly more diverse and locally-specific spatial distributions of development. In the case of revocation there may be more uncertainty about impacts in the short and medium term due to the transition period for those authorities where plans are out of date or who need to establish the arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in their adopted local plans. The application of the NPPFs 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.

**Where a Regional Strategy policy provides a strategic direction whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites, there may also be a difference in the short and medium term between retention and revocation.** Retention of the policy and the resulting development is likely to have significantly positive effects on the community and negative effects on biodiversity, air, water and material assets, in part because of the clarity and certainty provided by the retained policy. However, as in the previous example, the effects of revocation will be more uncertain until authorities define, agree and implement the duty to cooperate and then reflect them in their adopted plans. The application of the NPPFs 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.

**Whilst the duty to co-operate could well address a wide range of strategic issues, there is uncertainty as to how this might work both by topic and geographically.** Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.

The plan to revoke the Regional Strategies is national in scope as well as applying to the eight regions. In consequence the national implications and effects of the plan have also been considered in the cumulative assessment<sup>3</sup>. In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.

The following table presents a summary of the environmental effects of revocation, retention and partial retention of each of the 13 policy areas contained in the East of England Plan. It includes consideration of the short, medium and long term permanent and temporary, positive and negative effects. These

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<sup>3</sup> The assessment has also considered secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects,

cover a broad range of policy issues and encompass those contained in the Regional Economic Strategy, namely: enterprise; innovation; digital economy; resource efficiency; skills for productivity; economic participation; transport; and the spatial economy.

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

East of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
Spatial Strategy (Policies SS1 – SS9)	<p>There are no areas where revocation of those policies which make up the Core Spatial Strategy would have any negative effects.</p> <p>There may be a delay in realising the benefits in the short and medium term due to the time required to put in place up to date local plans and implement the duty to cooperate.</p>	<p>There would be similar range of effects to revocation. Effects in the short and medium term would be more pronounced as there would be no delay in implementation.</p>	<p>No significant effects identified.</p>	<p>No significant effects identified</p>	<p>No significant effects identified.</p>
Economic Development (Policies E1 – E7)	<p>The revocation of the policies is unlikely to affect local authorities planning for growth and in providing for these needs, there are expected to be significant benefits to the population in the long term. Adverse effects (for example on future water resources where effects would be significant) would be similar to those of retention.</p> <p>Mitigation of the effects on water resources would be through a combination of water resource management planning (Anglian Water), the Environment Agency's river basin management plans and the measures set out in the NPPF.</p>	<p>There would be similar range of effects to revocation. Effects in the short and medium term would be more pronounced as there would be no delay in implementation.</p>	<p>There would be similar range of effects to revocation.</p>	<p>There would be a similar range of effects to revocation although it might result in some confusion with the intent of the NPPF and how the retained policies are to be applied.</p>	<p>No significant effects identified</p>
Housing (Policies H1)	<p>The revocation of the policy is unlikely to affect local authorities' provision and</p>	<p>There would be similar range of effects to</p>	<p>There would be similar range of effects to</p>	<p>There would be a similar range of</p>	<p>No significant effects identified</p>

East of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
- H3)	<p>planning for housing. The NPPF requires all authorities to objectively assess their own housing markets and make provision accordingly. The negative effects on the region's water resources, noted above have been identified as being significant. The effects could be lessened or delayed due to some authorities needing to update and revise their Local Plans.</p>	<p>revocation. Effects in the short and medium term would be more pronounced as there would be no delay in implementation.</p>	<p>revocation</p>	<p>effects to revocation although it might result in some confusion with the intent of the NPPF and how the retained policies are to be applied.</p>	
Culture (Policies C1 – C2)	<p>The revocation of the policy is unlikely to affect local authorities' provision and planning for cultural heritage. There will continue to be significant positive effects on population and cultural heritage from the protection and enhancement of the historic environment and landscapes.</p>	<p>Similar effects to revocation</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>
Regional Transport Strategy (Policies T1 – T15)	<p>The revocation of the policy is unlikely to affect local authorities transport infrastructure provision and planning. Significant positive effects for population and health, air and climatic factors have been identified due to improved air quality and reduced potential for greenhouse gas emissions due to the emphasis on sustainable transport modes.</p>	<p>Similar effects to revocation</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>
Environment (Policies ENV1 – ENV7)	<p>The revocation of the policy is unlikely to affect local authorities' provision and planning for the environment. There will be benefits across virtually all of the SEA topic areas with many of the effects being significant due</p>	<p>Similar effects to revocation</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>	<p>No significant effects identified</p>

East of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
	to a combination of existing statutory environmental protection and the application of the NPPF policies.				
CO2 Emissions and Renewable Energy (Policies ENG1 – ENG2)	The revocation of the policy is unlikely to affect local authorities planning policy responses to the effects of climate change. There will be significant positive effects on the climatic factors topic with other benefits for population / health and water due to a combination of measures from existing statutory requirements and the application of NPPF policies at the local level. However, a minor difference in carbon reduction was identified.	Similar effects to revocation	No significant effects identified	There would be significant positive effects on climatic factors although it might result in some confusion with the intent of the NPPF and how the retained policies are to be applied.	No significant effects identified
Water (Policies Wat1 – Wat4)	The revocation of the policy is unlikely to affect local authorities planning policy for water resources. Significant positive effects have been identified for population, water and climatic factors.	Similar effects to revocation	There would be similar range of effects to revocation	No significant effects identified	No significant effects identified
Waste (Policies WM1 – WM8)	The revocation of the policy is unlikely to affect local authorities planning policy for waste management. Significant positive effects on material assets will arise due to the continued presence of national policy approaches in the PPS10 which seek to reduce the amount of waste being produced.	Similar effects to revocation	No significant effects identified	No significant effects identified	No significant effects identified
Minerals (Policy M1)	The assessment has identified significant positive benefits under biodiversity / flora/ fauna, population / health, soils and landscape – these reflect the sustainable	Similar effects to revocation	No significant effects identified	Similar effects to revocation	No significant effects identified

East of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
	approach to mineral extraction and supply which is presented in the NPPF.				
Sub Areas and Key Centres for Development and Change including Milton Keynes and South Midlands Sub Regional Strategy	Revocation of the policy will leave decisions to local authorities collaborating under the duty to cooperate to bring forward the necessary development across the sub-region in line with the policies in the NPPF. Specific effects and uncertainties have been identified where there is a difference between local authority and regional strategy policy e.g. Thetford, Hemel Hempstead and Welwyn Garden City.	There would be similar range of effects to revocation. Effects in the short and medium term would be more pronounced as there would be no delay in implementation.	No significant effects identified	There would be a similar range of effects as revocation although it might result in some confusion with the intent of the NPPF and how the retained policies are to be applied.	No significant effects identified

## What are the secondary, cumulative and synergistic<sup>4</sup> effects of the Plan to revoke the East of England Regional Strategy?

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

**Table NTS 3 Summary of Secondary, Cumulative and Synergistic Effects**

Assessment Topic	Summary Cumulative Effects
<b>Biodiversity and Nature Conservation</b> (which includes flora and fauna, and the functioning of ecosystems)	The existing good or favourable condition of priority wildlife habitats in the East of England should not be affected by any proposals for revocation of the Regional Strategy.  The NPPF together with legislation and wider national policies on biodiversity provides a strong framework to maintain the current high level

<sup>4</sup> This includes consideration of the effects in the short, medium and long term permanent and temporary and positive and negative effects.

Assessment Topic	Summary Cumulative Effects
	<p>of protection for the existing biodiversity resource; however, there may be some uncertainties associated with the implementation of the duty to cooperate.</p> <p>Achievement of legally binding targets for water and air quality will also be significant contributory factors in improving the quality of areas important for wildlife, while enhanced provisions on aspects such as the delivery and protection of green infrastructure will play an important role in increasing the overall area with significant biodiversity value.</p> <p>There remain localised concerns on the effects to the biodiversity resource, particularly where habitats are water dependent, which could be impacted by secondary, cumulative, synergistic effects from the increase demands for water and the effects on the availability of water arising from the effects of climate change.</p>
<b>Population</b> (including socio-economic effects and accessibility)	There are a range of significant direct and secondary positive benefits anticipated to accrue to communities from the provision of employment and housing land, improvements in local facilities and enhancement from local environmental quality. Revocation is unlikely to affect this.
<b>Human Health</b>	There are a range of direct and secondary benefits to human health of increasing the quality and quantity of new housing, addressing local deprivation and improving local environmental quality. Revocation of the East of England Regional Strategy will not affect the realisation of these benefits.
<b>Soil and Geology</b> (including land use, important geological sites, and the contamination of soils)	The cumulative effects remain uncertain although likely to be negative due to the ongoing demand for development land.
<b>Water Quality and Resources</b> (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	Potentially significant negative effects have been identified against this topic (arising from the cumulative effects of future development and increased demand in an increasingly water scarce region). These issues are likely to be compounded by the effects of climate change. Legislation and policy for water companies, the Environment Agency, developers and local authorities along with the NPPF policy will continue to ensure water resources are considered and sustainable managed.
<b>Air Quality</b>	<p>Whilst air quality in the East of England is relatively good there is growing pressures on air quality in particular locations, most notably due to the increasing traffic across the region.</p> <p>Revocation of the East of England Regional Strategy will not affect this trend.</p>
<b>Climate Change</b> (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	The East of England could be substantially affected by the effects of climate change (see biodiversity and water topics in particular). Revocation of the East of England Regional Strategy will not affect the national policy ambition to move towards a low carbon economy although carbon reduction may be marginally lower for revocation than if the target in the East of England Regional Strategy were realised.
<b>Waste Management and Minerals</b>	Ensuring timely provision of appropriate waste management facilities will have significant benefits on human health while reducing the amount of waste imported into the region should reduce traffic levels and have benefits for air quality. The reduction in the amount of waste disposed of to landfill will reduce the risk of water contamination and emission of green house gases (i.e. methane).

Assessment Topic	Summary Cumulative Effects
	Revocation of the East of England Regional Strategy will not affect waste management in the region. The combination of European Directives (notably the Landfill Directive) and PPS10, will ensure that waste management is undertaken in a manner consistent with the waste management hierarchy and with the intent to increase resource efficiency with a continued reduction in waste requiring disposal in landfill.
<b>Cultural Heritage</b> (including architectural and archaeological heritage)	The East of England cultural heritage is unlikely to be significantly affected by revocation. Existing legislation protecting listed buildings, scheduled monuments, conservation areas and registered parks and gardens remains in place, strengthened by the commitments in the NPPF.
<b>Landscape and Townscape</b>	The East of England landscapes are unlikely to be affected by revocation. Existing legislation and policy protection will remain although there may be gradual change over time (due to factors such as climate change, change in agricultural practices and economic conditions).

## Proposed Mitigation Measures

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

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

## Monitoring proposals

It is a requirement of the SEA Directive to establish how the significant effects of revoking the Regional Strategy will be monitored. As set out in ODPM Guidance<sup>5</sup>, *“it is not necessary to monitor everything or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.”*

CLG’s Business Plan<sup>6</sup> under section 5 ‘Put Communities in charge of planning’ includes specific monitoring actions for the department regarding the local plan making progress by authorities and on compliance with the duty to cooperate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised Local Plans. When reviewing the environmental effects of the final

<sup>5</sup> ODPM, September 2005: *Practical Guide to the Strategic Environmental Assessment Directive*

<sup>6</sup> CLG May 2012, Business Plan 2012-2015

decision on revocation, it is proposed that CLG will make periodic reference to the following metrics and sources of information contained in Table NTS 4. Any resulting analysis of long term trends will be used to consider whether any further mitigation or intervention is needed for:

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

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

**Table NTS 4 Proposed Monitoring Indicators and Sources of Information**

SEA Topics	Proposed 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>	JNCC 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> Defra <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> <li>• Population</li> <li>• Housing and additional net dwellings</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, Housebuilding: permanent dwellings completed by tenure and region
<b>Human Health</b>	Annual (where information allows) trends in:	

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	<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 of 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>ONS (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 in:</p> <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> </ul>	<p>Environment Agency &amp; Defra</p> <p><a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a></p> <p>Anglian Water</p> <p>Anglian Water</p>
<b>Air</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Number of AQMAs</li> <li>• Number of AQMAs were exceedances occurred.</li> </ul>	<p>Defra</p> <p>Defra</p>
<b>Climatic factors</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Emission of greenhouse gases</li> <li>• Number of properties at risk of flooding</li> </ul>	<p>DECC Statistical Release: Local and regional CO2 emissions</p> <p>EA</p>
<b>Material Assets</b>	<p>Annual (where information allows) trends in:</p> <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>	<p>EA</p> <p>EA</p> <p>EA</p> <p>East of England Mineral Planning Authorities'</p>
<b>Cultural heritage, including architectural and archaeological heritage</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• % of heritage assets of different types that are at risk</li> </ul>	<p>English Heritage 'Heritage at risk report'</p>

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
<b>Landscape and Townscape</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Change in AONBs (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 AONBs English Heritage (if 2003 survey repeated) ONS (proposed measures of wellbeing) DCLG <a href="http://www.communities.gov.uk/documents/housing/xls/1815794.xls">http://www.communities.gov.uk/documents/housing/xls/1815794.xls</a>

## What were the challenges faced in completing this Report?

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

## The next steps

This Environmental Report will be presented for consultation until Thursday 20<sup>th</sup> September 2012. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the regional strategies.

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# 1. Introduction

## 1.1 The Plan to Revoke Regional Strategies

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions.

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

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

## 1.2 Strategic Environmental Assessment (SEA)

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

*‘To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development’.*

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

### 1.2.1 Applying SEA to the Revocation of the Regional Strategies

Regional strategies are plans for the purpose of the European Directive 2001/42/EC because they are land use plans, are required by legislative, regulatory or administrative provisions and set the framework for future development consent of projects listed in Annexes I and II of the European Directive on environmental impact assessment. They are also subject to an appraisal of sustainability under the Planning and Compulsory Purchase Act 2004. Both requirements were met in a single process called

sustainability appraisal, as set out in guidance issued by the then Office of the Deputy Prime Minister in 2005.

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

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

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

Additionally, the Court of Justice of the European Union (CJEU) gave judgment in March on the applicability of the SEA Directive to a procedure for the total or partial revocation of a land use plan<sup>7</sup>. It held that such a procedure in principle falls within the scope of the Directive and is subject to the rules relating to the assessment of effects on the environment as laid down by the Directive.

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

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<sup>7</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*

The assessment in this Environmental Report can be considered as stand-alone and has been intentionally written to provide sufficient information for consultees to consider whether the likely significant environmental effects have been identified of the plan to revoke the Regional Strategy (and reasonable alternatives) without recourse to the previous Environmental Report.

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

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for the East of England<sup>8</sup> have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the East of England have been identified, described and assessed; and,
- the arrangements for monitoring.

### 1.3 Purpose of this Report

The purpose of this Environmental Report is to:

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

### 1.4 Habitats Directive Assessment

The Habitats Directive prohibits the adoption of plans or projects which have an adverse effect on the integrity of European sites unless there are no alternative solutions and the plan or project must be adopted for imperative reasons of overriding public interest.

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<sup>8</sup> For the purposes of this Environmental Report the regional strategy means the Regional Spatial Strategy for the East of England, and the Regional Economic Strategy for the East of England

The revocation of Regional Strategies does not affect the legal requirement set out in the Conservation of Habitats and Species Regulations 2010 that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive (Regulation 9). Part 6 of the Regulations also contains provisions which require the assessment of implications for European sites of any plan or project, which is likely to have a significant effect on it, before it proceeds in accordance with the Habitats Directive.

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

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

## 1.5 Consultation and Stakeholder Engagement

### 1.5.1 Overview

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

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

### 1.5.2 Scoping Consultation

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

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

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

The approaches taken in the appraisals during preparation of the strategies differed to some extent between regions, and the assessments inevitably reflect this. However, as far as possible, a broad assessment was made of the component policies in the regional strategy, identifying their objectives and any particular issues from the sustainability appraisals, so as to identify the key environmental issues arising in assessing the likely effects of revocation. The assessment focused on those aspects of the Plan which might be expected to lead to significant environmental effects.

The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. English Heritage focussed their comments on the implications for Heritage 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.

In addition, since this is the first time an environmental assessment had been undertaken for the revocation (rather than the creation) of a plan, a draft of the previous environmental report was also sent to the statutory consultation bodies for their comments. Their comments on the previous draft reports are presented in summary in **Appendix F**, together with a response.

### 1.5.3 Public Consultation on the previous Environmental Reports

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

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the environmental reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government SEA Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). 15 responses dealt specifically with the environmental report for the East of England - only 5 responses were received from local planning authorities within the East of England. A further 64 dealt solely with environmental reports for regions

other than the East of England. A summary of the 39 consultation responses relevant to the East of England environmental report is set out at **Appendix F**.

The main issues raised by respondents on the previous environmental reports, which were relevant to the East of England, are grouped into 6 broad themes as follows:

- The Overall Approach to SEA;
- Assessment;
- Reliance on the NPPF;
- Policy Change;
- Reliance on the Duty to Cooperate;
- Individual Topics (covering data availability, greenbelt, gypsies and travellers, housing supply, heritage, waste, biodiversity, renewable energy, transport, water, brownfield land, the coast, flooding and managed woodland).

Only one response was received on the proposal to revoke saved structure plan policies in the East of England. This was from English Heritage who questioned the proposal to revoke saved Structure Plan policies P9/2b (Review of Green Belt Boundaries) and P9/2c (Location and Phasing of Development Land to be Released from the Green Belt) from the Cambridgeshire and Peterborough Structure Plan together with policy CSR3 (Green Belt) in the East of England Plan would result in the loss of strategic policy content identifying the importance of the Cambridge Green Belt. However, the purpose of the Cambridge Green Belt is also explained in similar terms in the Local Plan for Cambridge City Council which was adopted in 2006. In addition, Policy 3/2 (Setting of the City) in the Local Plan states that “Development will only be permitted on the urban edge if it conserves or enhances the setting and special character of Cambridge and the biodiversity, connectivity and amenity of the urban edge is improved”. These Local Plan policies will be unaffected by revocation.

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

**Table 1.1 Summary of consultation responses**

Issue	Summary of consultation responses to the previous Environmental Report	Response
The overall approach taken to SEA	The Environment Agency supported the broad approach to the analysis presented in the October 2011 environmental reports. Natural England recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the East of England Plan on heritage assets. Other respondents thought the analysis	Chapter 1 of the environmental report sets out how the report meets the requirements of the SEA Directive.  The impacts of revoking, retaining or partially revoking the East of England Plan have been assessed in detail in the short, medium and long term against the 12 SEA topics. This includes Cultural Heritage – including architectural and archaeological heritage.

Issue	Summary of consultation responses to the previous Environmental Report	Response
	was undertaken to late in the plan making process and was not consistent with the requirements of the Directive	
Assessment	The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.	The environmental report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the East of England Plan in the short, medium and long term against all 12 SEA topics, taking into account the content of local plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-technical summary is provided.
Reliance on the NPPF	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the environmental report takes account of the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the East of England 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 Cooperate	Some respondents thought that it was unlikely that the duty to cooperate 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 Cooperate and supporting regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the NPPF sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The NPPF also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.
Individual Topics	Respondents raised a number of questions about individual topics. In particular, respondents thought that the impact of the revocation of the East of England could impact on Green Belt, the provision of gypsy and traveller pitches, housing allocations, heritage, waste management, biodiversity, renewable energy, transport, water, brown field land, coast, flooding and managed woodland.	Individual policies for the planning of individual topics is described in the environmental report, drawing on the policies set out in the NPPF.

## 1.6 Structure of this Report

The assessment in this Environmental Report builds on the earlier assessment that was published for consultation in October 2011 and in particular includes further work in response to consultees' comments. This includes additional work to revise and update the baseline and contextual information used in the assessment, a necessary strengthening of the evidence base used as well as providing

greater detail in the assessment itself. The approach that has been undertaken is set out in **Section 3.1** with the resulting information presented in **Appendices C, D, E, G and H**.

**Table 1.2** sets out how the information requirements of Annex I of the SEA Directive are met in this Environmental Report. Reasonable alternatives are considered in Section 2 and the approach taken to the assessment is explained in Section 3. Section 4 summarises the likely significant effects of revoking the Regional Strategy along with reasonable alternatives, where identified, including any secondary, cumulative or synergistic effects in the short, medium and long term. Section 5 provides a summary of the key findings along with proposed monitoring measures.

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

SEA Directive Requirements	Where covered in the Environmental Report?
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Section 2 outlines the contents and main objectives of the plan.  Section 3 presents a summary of the relationship with other relevant plans and programmes.  Appendix E (the SEA topic information chapters) presents greater details the other plans and programmes that are relevant to the Plan.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Appendix E (the SEA topic information chapters) outlines the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
c) The environmental characteristics of areas likely to be significantly affected	Appendix E (the SEA topic information chapters) outlines the environmental characteristics of areas likely to be significantly affected.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Appendix E (the SEA topic information chapters) outlines any existing environmental problems.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Appendix E (the SEA topic information chapters) outlines the relevant environmental protection objectives.

SEA Directive Requirements	Where covered in the Environmental Report?
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Appendix D, Appendix E and Section 4 outline the likely significant effects of the Plan on the SEA issues.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Appendix E and Section 4 outline the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse effects of the Plan.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 2 outlines the reasons for selecting the alternatives.  Section 3 contains and a description of how the assessment was undertaken including any difficulties encountered.
i) A description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 5 presents proposals for monitoring.
j) A non-technical summary of the information provided under the above headings	A non-technical summary is provided.



## 2. The Plan to Revoke the Regional Strategies

### 2.1 Overview

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”<sup>9</sup>. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions. The Government’s proposal is to replace the eight regional strategies outside London with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to realise their aspirations for housing and economic growth.

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

The Regional Strategy under consideration for revocation comprises the East of England Plan published by the then Secretary of State in 2008 and the Regional Economic Strategy published by the East of England Development Agency finalised in 2009.

The individual policies from the East of England Plan are presented in **Appendix A**. The whole Plan can be viewed at:

<http://webarchive.nationalarchives.gov.uk/20100505213210/http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/>

The vision, ambitions, priorities and implementation priorities from the East of England Regional Economic Strategy are presented in **Appendix H** and can be viewed at:

<http://webarchive.nationalarchives.gov.uk/20090225025012/englandsrdas.com/reports/search/?cat=4>

This section sets out the key aspects of the plan to revoke the Regional Strategies, the implications for the East of England region and the alternatives considered.

### 2.2 Key Aspects of the Plan to Revoke the Regional Strategies

The National Planning Policy Framework (NPPF) was published on 27th March 2012. This followed extensive consultation during 2011 and replaces government planning policy and mineral policy guidance for England. It provides ‘*a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of*

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<sup>9</sup> HM Government (2010), The Coalition: our programme for government

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

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

### 2.2.1 Partnership Working on Strategic Planning Issues

The Planning and Compulsory Purchase Act 2004 provides for two or more councils to prepare joint local plans either through joint working under section 28 or through the establishment of a joint committee under section 29.

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

### 2.2.2 Duty to Co-operate

Section 110 of the Localism Act 2011 inserts new section 33A into the Planning and Compulsory Purchase Act 2004: the duty to co-operate. The duty is a new requirement<sup>10</sup> on local authorities and other public bodies to work together constructively, actively and on an ongoing basis in relation to planning for strategic, cross-boundary matters in local and marine plans. The NPPF does make clear that local authorities should set out the strategic priorities for the area in the Local Plan and that these should include strategic policies on certain issues; however, this is an inclusive list rather than an exclusive one and it is for authorities to determine whether there are additional strategic priorities in their areas and what strategic policies should cover.

The Localism Act requires authorities to demonstrate to an independent inspector how they have met the duty when their plans are submitted for examination in public. There is no prescribed way to meet the duty to co-operate, but compliance could for example be demonstrated by plans or policies prepared as

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<sup>10</sup> Through Regulations made under Section 33A of the PCPA 2004, which came into force on 6<sup>th</sup> April 2012, the duty to co-operate is extended to bodies such as the Environment Agency and Natural England.

part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that authorities may not pass the examination process.

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

### 2.2.3 Local Development Orders (LDOs)

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

### 2.2.4 Local Enterprise Partnerships

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

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

The Government has allocated £570m of Growing Places Fund to all 39 LEPs. The Growing Places Fund will enable targeted investment in pieces of infrastructure which unlock viable schemes that are not able to proceed because capital constraints have reduced the flow of investment in the physical

infrastructure which enables development (e.g. transport, utilities and flood defence). The fund should also be used to establish revolving funds.

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

## 2.2.5 Examples of Cross-Authority Working in the East of England Region

### Local Enterprise Partnerships in the East of England

There are four Local Enterprise Partnerships in the East of England region, covering Norfolk and Suffolk; Greater Cambridge and Greater Peterborough; Hertfordshire and the south-east including Essex, Kent and East Sussex. These are described in more detail below.

#### *New Anglia (Norfolk and Suffolk)*

New Anglia's three key priority areas are tourism, energy and business support. These are the sectors and the areas that offer real and immediate potential for growth and job creation, especially for small and medium sized enterprises. The Local Enterprise Partnership:

- is working with experts and partners in the private sector to cut through the red tape, and support real tourism business growth. East Anglia is also looking to become the UK's Energy Coast.
- aims to secure investment in major renewable energy programmes along the coastline, and provide the support services/businesses that a successful energy sector needs. The Great Yarmouth/Lowestoft enterprise zone is focused around the energy sector – both offshore renewables and nuclear energy.
- acting as a co-ordinator and 'enabler' of business support across Norfolk and Suffolk.
- has launched a Green Economy Pathfinder Strategy which sets out how it will seek to help strengthen supply chain for green goods and services across the two counties.

#### *Greater Cambridge and Greater Peterborough (Cambridge, East Cambridgeshire Fenland, Forest Heath, Huntingdonshire, Kings Lynn and West Norfolk, North Hertfordshire, Peterborough, Rutland, St Edmundsbury, South Cambridgeshire, Uttlesford)*

The Local Enterprise Partnership is seeking to broaden and deepen:

- the Cambridge 'ideas brand' to become Europe's leading high-tech research and development centre;
- the Peterborough Environment City current designation to become the UK's Environment Capital; and
- the strengths, opportunities and synergies of their market towns and rural economy.

Its four priority areas of focus are:

- Skills and employment;
- Strategic economic vision, infrastructure, housing and planning;
- Economic development and support for high growth business;
- Funding, including EU funding, regional growth funding and private sector funding.

The LEP is also providing strategic leadership around the delivery of the Alconbury enterprise zone. Its sectoral focus is ICT, bio-technology, pharmaceuticals, advanced manufacturing, creative industries, engineering and processing.

#### *Hertfordshire (Hertfordshire)*

The Local Enterprise Partnership is focusing on:

- Stimulating innovation, particularly around the county's key strengths in research and development, life sciences, telecoms and information technology;
- Encouraging enterprise to maintain high levels of business start ups and encouraging growth of local SMEs;
- Attracting inward investment into the county.

#### *South East Local Enterprise Partnership (includes Essex as well as Kent and East Sussex)*

The South East Local Enterprise Partnership has four core objectives. These are to:

- Secure the growth of the Thames Gateway;
- Promote investment in its coastal communities ensuring that they are able to take advantage of future opportunities in tourism, low carbon technologies (including offshore wind, solar power and other renewable energy sources), creative and cultural industries, manufacturing, engineering and business services;
- Strengthen its rural economy to ensure growth in tourism and high value added services as super fast broadband is rolled out across the LEP area;
- Strengthen the competitive advantage of strategic growth locations.

#### *Great Yarmouth and Lowestoft*

In 2011 the New Anglia LEP established Enterprise Zones for the coastal towns of Great Yarmouth and Lowestoft, to foster green economic growth. To simplify the planning framework in line with the Enterprise Zone requirements, Local Development Orders (LDOs) have been introduced. This enhances permitted development rights for energy, offshore engineering and ports and logistics businesses.

## Local Development Orders

Coastal flood risk is a challenge for both towns, exacerbated by climate change related sea level rise. Other environmental issues include sensitive aquifers and contaminated land. All seven LDO sites are on principle aquifers and one is wholly within a source protection zone (SPZ1). Partnership working between the Environment Agency and the four local authorities involved - Waveney District Council; Great Yarmouth Borough Council; Norfolk County Council and Suffolk County Council - has helped them to jointly agree all seven individual LDOs, and address environmental issues, in particular flood risk, in a strategic but flexible way.

## Other Partnership Working

In **Norfolk**, Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council formed the Greater Norwich Partnership (GNP) in recognition of the fact that the city of Norwich and its hinterland have issues in common.

Managed by the GNP, a joint core strategy was adopted in March 2011 (Note: part of the strategy has recently been put back to pre-submission stage as a result of a legal challenge). The approach adopted by the GNP is based on agreement about the need for growth and is built upon a history of informal joint working arrangements. The benefits of working together on spatial planning issues have in turn lead to productive joint working at the economic level.

**Northstowe in Cambridgeshire.** In Northstowe, Cambridgeshire, South Cambridgeshire District Council and Cambridge County Council are working together jointly with the Homes and Community Agency and developers to deliver a new town, comprising a sustainable community for 25,000 people. The **Essex** councils are producing an integrated strategy focused on the direction of their future economy. This defines priorities, identifies the area's assets, and agrees where resources should be applied.

## 2.3 Background and Description of the East of England Regional Strategy to be Revoked

### 2.3.1 Legislative Background to Regional Strategies

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

In 1988 regional planning guidance was introduced to provide a strategic framework for county structure plans. Regional planning guidance was not statutory and therefore structure plans and local plans were not required to be in conformity with it.

The Planning and Compulsory Purchase Act 2004 introduced a two tier statutory spatial development plan system consisting of regional spatial strategies and local development frameworks. The counties retained statutory planning powers for minerals and waste plans, but county structure plans were abolished.

Initially, the regional spatial strategy (RSS) for each region consisted of existing regional planning guidance. These were then reviewed, leading in most cases to publication of updated strategies, though only parts of the West Midlands strategy were reviewed, and the review of the South West plan was never completed. In revising their RSS, regional planning bodies were required to have regard to the regional economic strategy (RES) for the region.

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

The Local Democracy Economic Development and Construction Act 2009 introduced regional strategies (RS). These came into existence on 1 April 2010 for the eight English regions outside London. The intent was that each RS would initially consist of the existing RSS and the RES for the region but for the responsible authority in each region to bring forward a revised RS. However, no revised RS were adopted so each RS continues to consist of the existing RSS and the RES.

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

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

### 2.3.2 The Development of the East of England Plan (Regional Spatial Strategy)

The East of England Regional Spatial Strategy (known as the East of England Plan) is based on a draft revision to the Plan prepared by the East of England regional assembly and submitted to the Secretary of State in December 2004 (the 'submission draft'). The submission draft was amended through the Secretary of State's 'proposed changes', December 2006, which responded to the recommendations of the panel which conducted an examination in public of the submission draft of the strategy between November 2005 and March 2006, and as a consequence of considering the consultation responses to those proposed changes.

Preparation of the East of England Plan was informed by sustainability appraisal at both the submission draft and proposed changes stages, incorporating strategic environmental assessment. The Secretary of

State's proposed changes were also assessed against the requirements of the European Habitats Directive. In response to representations on that assessment by the regional assembly, Natural England and others, the assessment was revisited and a number of additional changes were made to ensure the Plan was fully compliant with the Directive (Secretary of State's 'further proposed changes', October 2007). The chronology is set out in the box below.

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

A High Court hearing in May 2009, found in favour of a legal challenge brought by Hertfordshire County Council and St Albans District Council against the Government on aspects of the Plan relating to development in the Green Belt around the towns of Hemel Hempstead, Welwyn Garden City and Hatfield. The East of England Plan contained major housing growth in Hertfordshire for the period 2001-2021, including a requirement for large scale strategic housing growth and strategic Green Belt reviews around these towns. The judge's decision was confirmed in a legal order in July 2009 quashing the relevant parts of the Plan (i.e. parts of Policy SS7: Green Belt; Paragraph 2 of Policy LA1: London Arc; Policy LA2: Hemel Hempstead Key Centre for Development and Change; and Policy LA3: Welwyn Garden City and Hatfield Key Centre for Development and Change) and referring them back to the Secretary of State. These policies were never revised.

Final policies on gypsy and traveller sites and travelling showpeople pitches were inserted into the Plan in July 2009.

In January 2010, a further change was made with the publication of a new replacement policy 'ETG2' concerning the development of Thurrock Lakeside.

The East of England Plan as a whole comprises not only the main 2008 document and subsequent revisions, but also relevant parts of the 2005 Milton Keynes and South Midlands Strategy (MKSM).

### 2.3.3 The Content of the East of England Plan

The East of England Plan covers the period from 2008 to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce impact on, and exposure to, the effects of

climate change and to put in place a development strategy with the potential to support continued sustainable growth beyond 2021.

The overall Spatial Vision is described as follows:

**By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable inclusive communities. At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use and by strengthening its stock of environmental assets.**

The Plan's main objectives are to:

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

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

The East of England Plan contains:

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

Also included is a framework for implementing, monitoring and reviewing the East of England Plan. Further details of the individual policies are set out in **Appendix A**.

The East of England Plan reflects the national policies on development at the time of its publication. It incorporates the regional transport strategy and also takes account of and builds on the Regional Economic Strategy (RES -see below for more details) produced by the East of England Development

Agency and the Regional Sustainable Development Framework, which provides a high level statement of the regional vision for achieving sustainable development.

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

### 2.3.4 The Content of the East of England Regional Economic Strategy

The primary focus of the Regional Economic Strategy (RES) is to set an ambitious vision for the economy to 2031 and priorities for action that contribute to that vision. It is intended to ensure that 'those responsible for economic decision-taking are working effectively together, with common goals and accepted priorities for regional development'. It was developed with regional partners and was subject to a formal consultation and appraisal process.

The RES vision expresses a clear direction of travel for the region:

**By 2031, the East of England will be:**

- **internationally-competitive with a global reputation for innovation and business growth**
- **a region that harnesses and develops the talents and creativity of all**
- **at the forefront of the low-carbon and resource-efficient economy**

**and known for:**

- **exceptional landscapes, vibrant places and quality of life**
- **being a confident, outward-looking region with strong leadership and where communities actively shape their future**

It also sets headline regional ambitions (with targets) requiring co-ordinated action of local, regional and national partners to ensure the East of England improves both its economic and environmental performance while addressing inequality. These cover productivity and prosperity; employment; skills; inequality; greenhouse gases; and water resources. Priorities for action cover:

- Enterprise
- Innovation
- Digital Economy
- Resource Efficiency

- Skills for Productivity
- Economic Participation
- Transport
- Spatial Economy

### 2.3.5 The Relationship Between the East of England Plan and the Regional Economic Strategy

There is a strong and complementary relationship between the East of England Plan and the East of England RES:

- they share an understanding of the spatial priorities of the region, particularly around the key centres of development and change. The RES adds an economic analysis of the scale and roles of key centres for development and change;
- the East of England Plan includes policies to support economic diversity and business development that support the priorities outlined in the RES;
- the headline regional ambitions in the RES are consistent with the housing supply targets in the East of England Plan;
- there are shared objectives in the two strategies covering housing, infrastructure and regeneration;
- both the RES and East of England Plan have been prepared in accordance with the region's sustainable development priorities, and the underlying principles in the regional economic strategy are consistent with the emerging Integrated Sustainability Framework (ISF); and
- the RES and the associated evidence base provide material input to the proposed early review of the East of England Plan in setting the context for the region's development needs to 2031.

### 2.3.6 Structure Plans

In 2007 the Government wrote to local authorities under the transitional provisions of Schedule 8 to the Planning and Compulsory Purchase Act 2004 to advise them which policies from their existing structure plans would be saved after 27 September 2007. Policies were saved in the expectation that they would be replaced promptly by policies in the relevant regional spatial strategy, or development plan documents for the relevant local authorities. Section 109(5) of the Localism Act provides for the revocation of saved structure plan policies.

The analysis of the 46 saved structure plan policies in the East of England has been updated, to take account of the publication of the NPPF, and the policies are listed in Appendix B. These saved structure plan policies were either found to be superseded by policies in local plans or reflected in national policy.

The Government is proposing to revoke these remaining 46 saved structure plan policies.

### 2.3.7 Local Plans

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

Regional spatial strategies<sup>11</sup> form part of the statutory development plan under the Planning and Compulsory Purchase Act (PCPA) 2004, until such time as the regional strategies are revoked.

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

The remaining local planning authorities in the East of England, who were yet to adopt a development plan document under the PCPA 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990.

On revocation of the regional strategy (and any saved structure plan policies), the statutory development plan would comprise any saved local plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the powers brought forward by the Localism Act. Revocation does not affect the statutory duty on local authorities to keep under review the matters which may be expected to affect the development of their area or the planning of its development.

A list of local plans in the East of England region and their current composition is included at **Appendix C**. There are a total of:

- 23 Local Plans adopted by May 2008;
- 24 Core Strategies adopted after May 2008, when the East of England Plan was adopted ;
- 7 minerals and waste plans, of which 4 were adopted after May 2008.

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<sup>11</sup> By virtue of section 82(2) of the Local Democracy, Economic Development Act 2009 as amended by the Localism Act references to regional strategy in relation to the component of the development plan are to the regional spatial strategy that subsisted for that region immediately before 1 April 2010.

## 2.4 Reasonable Alternatives to the Plan to Revoke the Regional Strategies

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

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

In order to meet the requirements of the SEA Directive and the relevant UK transposing regulations, the Government is also required to present specific information concerning reasonable alternatives. Article 5 (1) of the SEA Directive 2001/42/EC requires that “*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, **and reasonable alternatives** taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*”. Information to be provided includes “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I (h)).

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

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

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

- reviewing the Regional Strategies;
- revoking the Regional Strategies but saving key policies;

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

A number of alternatives are therefore considered as follows:

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

Each alternative is discussed below in regard to its reasonableness.

#### 2.4.1 Retention

##### Retention of the East of England Regional Strategy but not updating it in the future

This option would mean that the East of England Regional Strategy was not revoked, that all the policies within the East of England Plan would remain part of the development plan for the purposes of

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

Some policies in the East of England Plan are potentially in conflict with the intent of the National Planning Policy Framework (NPPF) which sets the Government's planning policies for England and how these are to be applied e.g. H1 and H2 on housing allocations, E1 on employment land and E3 on strategic employment sites.

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

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

### Retention, maintenance and updating of the East of England Regional Strategy

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

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

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

#### 2.4.2 Partial Revocation of the East of England Regional Strategy

##### Revocation of all the quantified and spatially specific policies

This option would mean that all quantified policies (such as for a renewable energy target) or policies that are spatially specific and which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. within the East of England Plan policies for housing allocations; pitches for gypsies, travellers and travelling show people; employment (both land and jobs), mineral allocations; waste disposal) would be revoked, but that the non spatial policies would be retained. This would leave the policies in place which would set out a spatial vision for the region as well as policies that encourage particular types of development or seek to protect environmental resources and services as well as seeking wider sustainability objectives. These policies would not be updated in the future as the Secretary of State no longer has the statutory powers to do this. These policies would therefore be retained for a transitional period to allow local authorities in the region to have time to update their plans. **This is considered to be a reasonable alternative.**

##### Revocation of all the non quantitative and spatially specific policies

This option for partial revocation of the East of England Regional Strategy would mean that all quantitative targets (such as the one for renewable energy) or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. housing allocations; pitches for gypsies, travellers and travelling show people; employment land and/or jobs, mineral allocations; waste allocations) would be retained and the non-spatially specific policies, ambitions and priorities would be revoked (such as protection and enhancement of biodiversity, the historic environment, the quality of the built environment).

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

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

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

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

Furthermore, it is questionable whether the sub-regional policies would function correctly in the absence of regional scale policies such as on spatial planning (SS2), environmental protection, water resources and the high level apportionment policies on housing due to the integrated nature of the East of England Plan. In addition, over time the Regional Strategy policies are becoming increasingly out of date as the regional tier of planning has been removed and the regional strategies are not being kept up to date. **This is not therefore considered to be a reasonable alternative.**

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

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

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

This reasonable alternative would lead to the retention of individual policies in the Regional Strategy which are not likely to be in conflict the National Planning Policy Framework, do not undermine the localist approach to plan making and decision making and, if removed, would result in a significant environmental impact taking account of mitigation. This would support the local plan led system and the localist approach to planning, it would not result in conflict or confusion in the planning system since the policies to be retained are likely to be consistent with those in the National Planning Policy Framework.

These policies could therefore be retained for a transitional period to allow local authorities in the region to have updated their plans. **This is considered to be a reasonable alternative.**

## 2.5 Summary

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

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

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

### 3. SEA Methodology

#### 3.1 Overview

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

The approach to this assessment builds on the methodology employed in the Environmental Report published in October 2011. The steps that have been undertaken to-date and their relationship to the requirements of the SEA Directive are summarised in **Table 3.1**.

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

SEA process	Key steps in the environmental assessment of the revocation of the regional strategies
<p><b>Article 3 (1)</b> requires that an environmental assessment shall be carried out for certain plans (as defined in Article 3 paragraphs 2-4) which are likely to have significant environmental effects.</p> <p>Member States are required to determine whether these plans are likely to have significant environmental effects either through case-by-case examination and/or by specifying types of plans in order to ensure that plans with likely significant effects on the environment are covered by the Directive (<b>Article 3(5)</b>).</p> <p>Member States must make their conclusions under Article 3(5), including the reasons for not requiring an environmental assessment, available to the public (<b>Article 3(7)</b>).</p>	<p>The Government announced its intention to carry out an environmental assessment of the revocation of the regional strategies in a Written Ministerial Statement on 5 April 2011. The requirements of Articles 3(5) and (7) did not therefore apply.</p>
<p><b>Article 5 (4)</b> requires that 'designated environmental authorities' for strategic environmental assessment are consulted when deciding the scope and level of detail which must be included in the environmental reports.</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 define these "Consultation Bodies" for plans that relate to England as the Countryside Agency and English Nature (now amalgamated to form Natural England), the Environment Agency and English Heritage.</p>	<p>The Consultation Bodies in England<sup>12</sup> were consulted on the scope and level of detail of the environmental reports on 6 May 2011, and were given 5 weeks as required by regulations to respond. The equivalent bodies in the Devolved Administrations were also consulted.</p> <p>Their comments were used as the basis for deciding the scope and level of detail of the material included in the environmental reports. Consideration was also given to more detailed textual comments provided by the consultation bodies.</p>
<p><b>Article 5 (1)</b> states that where an environmental assessment is</p>	<p>An Environmental Report was prepared for each region. Each</p>

<sup>12</sup> The Environment Agency, English Heritage and Natural England

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

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

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

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

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

## 3.2 Scope of the Assessment

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

### 3.2.1 Environmental Categories Included in the Scope of the Assessment

The range of potential environmental effects under consideration has been informed primarily by the SEA Directive and Regulations, using published government guidance<sup>13</sup>. Annex I of the SEA Directive and Schedule 2 of the SEA Regulation requires that the assessment includes information on the “*likely significant effects on the environment, including on issues such as: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationship between the issues referred to*”. These environmental categories have been used throughout this report.

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

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

Land use is not explicitly identified in the list of 12 SEA topics; however, for the purposes of this assessment and in particular given that these are assessments of strategies whose primary objectives

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<sup>13</sup> Office of the Deputy Prime Minister (2005). A Practical Guide to the Strategic Environmental Assessment Directive.

include the determination of the location of development, it is included under the topic of soil. The soil topic has also been expanded to include consideration of geology.

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

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

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

### 3.2.2 Geographic Scope of the Assessment

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

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

policies that seek to promote economic regeneration of a sub-region, recognised as having a specific identity or character;

- **the local level** – the assessment includes consideration of the effects of the plan to revoke regional strategy policies that will have a specific effect at a local planning authority level, or will affect a specific designated area or identified infrastructure project.

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

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

### 3.2.3 Short, Medium and Long-Term Timescales

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

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

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

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

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

### 3.3 Context and Baseline

#### 3.3.1 Review of Plans and Programmes

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

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

#### 3.3.2 Collecting Baseline Evidence

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

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

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

#### 3.3.3 Presenting the Context and Baseline Information

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

- **introduction** - provides an overview and definition of the topic;
- **summary of national and regional plans and programmes** - provides an overview of the policy context in which the revocation plan sits;

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

## 3.4 Approach to Assessing the Effects

### 3.4.1 Prediction and Evaluation of Effects

In line with the ODPM (now CLG) *Practical Guide to the SEA Directive*<sup>14</sup>, the assessment process seeks to *predict the significant environmental effects of the plan or programme*. This is done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information has not been available, the assessment has been based on professional judgement and with reference to relevant legislation, regulations and policy.

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

- **A high level (or screening) assessment** of the effects of the proposals for each regional strategy policy against all SEA topics to identify those where there could be a likely significant effect (using definitions as outlined in **Table 3.4**); and

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<sup>14</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online at: <http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

- **A detailed assessment of the likely significant effects** (both positive and negative) identified through the high level assessment process of each regional strategy policy, presented under each SEA topic.

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

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

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

**Table 3.3 High Level Assessment Matrix**

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

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

### 3.4.2 Determining Significance

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

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

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

Effect	Description	Illustrative Guidance
--	Significant negative	<ul style="list-style-type: none"> <li>Alternative would have a major negative and sustained effect on European or national designated sites and/or protected species (e.g. – prevents reaching all conservation objectives on site, long term decrease in populations of designated species). These impacts could not reasonably be compensated for.</li> <li>Alternative would have strong negative effects on local biodiversity (e.g. – through an minor increase in disturbance/pollutant emissions, or considerable loss of habitat leading to long term loss of ecosystem structure and function).</li> </ul>
?	Uncertain	<ul style="list-style-type: none"> <li>From the level of information available the impact that the Alternative would have on this objective is uncertain.</li> </ul>

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

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

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

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

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

### Considering Effects on Local Plans

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

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

### Considering the Effects of the Regional Economic Strategy

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

### 3.4.4 Secondary, Cumulative and Synergistic Effects Assessment<sup>15</sup>

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

**Table 3.5 Definitions of Secondary, Cumulative and Synergistic Effects**

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

\*Adapted from SEA guidance, ODPM (2005)

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

### 3.4.5 Assumptions used in the Assessment

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

- The effects and findings of the relevant Sustainability Appraisal are valid over the lifetime of the relevant regional strategy; however, that there may be some variation in the short term.** For example, all regional strategies contain housing allocations, quantified on an annual basis and over the lifetime of the plan at the region and local authority level. It is evident that since adoption of the regional strategies, actual housing completions per annum are below the levels expected in each strategy. In consequence, when considering the quantum of growth in the short term, based on the actual figures to date, retention will lead to a lessening of some effects (both benefits of increased housing provision and any negative effects arising from land take and loss of any natural resources); however, we have assumed that over the lifetime of the regional strategy that the housing policy will still be

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<sup>15</sup> This includes consideration of the effects in the short, medium and long term; permanent and temporary and positive and negative effects.

delivered and that the medium and long term effects would remain unchanged by the short term deviation. It is appreciated that whilst this appears to be reasonable assumption, it could be affected by the health of the economy or market changes. However, determining alternative credible views on the likely future outcome of regional strategies and their expectations for new development risks adding an extra layer of subjectivity to a process that is already relying heavily on judgements about future impacts in an uncertain world.

- **For revocation, the assessments anticipate that local plans will be put in place consistent with the principles and policies set out in the NPPF.** This includes the presumption in favour of sustainable development and the expectation that “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system” and that “the planning system should play an active role in guiding development to sustainable solutions”. These expectations are reflected in the assessment of effects at the local level. However, it will take time for local plans to be put in place which may result in some uncertainties over the effects of revocation in the short and medium terms. The application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.
- **It is assumed that local authorities will continue to work together on cross boundary strategic issues.** This will be supported by the new duty to co-operate in relation to the planning of sustainable development. The duty will ensure that local authorities and other public bodies are involved in a continual process of constructive and active engagement which will maximise effective working on development planning in relation to strategic planning issues that cross administrative boundaries.

## 3.5 Technical Difficulties

### 3.5.1 Assessing the Effects of Revocation is a New Requirement

Until the European Court judgement<sup>16</sup> in March 2012, SEA was only applied to the preparation and modification of relevant plans and programmes. The ruling now extends the application to the revocation of land use plans. Whilst there is guidance and relatively well established processes available to assess the effects of a plan’s preparations, there is no equivalent for revocation and no established practice on how to undertake such an assessment. Necessarily then, this assessment is part of a body of emerging practice and is the first such that is in compliance with the SEA Directive requirements in the UK.

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

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<sup>16</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*

### 3.5.2 Ensuring Consistency

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

### 3.5.3 Varying Age and Status of the East of England Regional Strategy

The Regional Strategy considered in this assessment is not single discrete documents, but in fact reflects various revisions, post adoption. The East of England Plan was published in 2008; however, was subsequently revised in 2009 and then again in 2010.

### 3.5.4 Uncertainty and Future Effects

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

# 4. Assessment of Effects of Revoking the East of England Regional Strategy and the Reasonable Alternatives

## 4.1 Overview

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

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

## 4.2 Effects of Revoking the East of England Regional Strategy

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

The following key has been used in completing the assessment.

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

Table 4.1 Summary of the Effects of Revoking the East of England Regional Strategy (with reference to the East of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy SS1	Achieving sustainable development	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
RS Policy SS2	Overall Spatial Strategy	Revocation	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	
RS Policy SS3	Key Centres for Development and Change	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
RS Policy SS4	Towns other than Key Centres and Rural Areas	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	
RS Policy SS5	Priority Areas for Regeneration	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy SS6	City and Town Centres	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0
RS Policy SS7	Green Belt	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	0	0	0	?	?	?	?	?	?
RS Policy SS8	The Urban Fringe	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy SS9	The Coast	Revocation	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy E1	Job Growth	Revocation	-	-	-	?	?	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy E2	Provision of Land for Employment	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RS Policies E3	Strategic Employment Sites	Revocation	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy E4	Clusters	Revocation	-	-	-	+	+	+	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-			
RS Policy E5	Regional Structure of Town Centres (Policy adopted July 2010)	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0			
RS Policy E6	Tourism	Revocation	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	?	?	?
RS Policy E7	The Region's Airports	Revocation	-	-	-	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
RS Policy H1	Regional Housing Provision 2001 to 2021	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	-	-	-	-	-	-			
RS Policy H2	Affordable Housing	Revocation	?	?	?	+	+	+	+	-	-	-	-	-	-	-	-	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy H3 and H4	Provision for gypsies and travellers, and travelling showpeople (July 2009 Revision)	Revocation	0	0	0	?	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy C1 and C2	Cultural development and Provision and Location of Strategy Cultural Facilities	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	
RS Policy T1	Regional Transport Strategy Objectives and Outcomes	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	-	-	-	0	0	0	0	0	
RS Policy T2 and T3	Changing Travel Behaviour and T3: Managing Traffic Demand	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	
RS Policy T4	Urban Transport	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy T5	Inter Urban Public Transport	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T6	Strategic and Regional Road Networks	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T7	Transport in Rural Areas	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T8	Local Roads	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T9	Walking, Cycling and other Non-Motorised Transport	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T10	Freight Movement	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
RS Policy T11	Access to Ports	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
RS Policy T12	Access to Airports	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	+	+	+	-	-	-	?	?	?	?	?	?	?	?	?

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy T13	Public Transport Accessibility	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
RS Policy T14	Parking	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	?	?	?	?	?	0	0	0	0	0	0	0	0	0
RS Policy T15	Transport Investment Priorities	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy ENV1	Green Infrastructure	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV2	Landscape Conservation	Revocation	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
RS Policy ENV3	Biodiversity and Earth Heritage	Revocation	+	+	+	0	0	0				0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV4	Agriculture, Land and Soils	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy ENV5	Woodlands	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+
RS Policy ENV6	The Historic Environment	Revocation	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
RS Policy ENV7	Quality in the Built Environment	Revocation	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy ENG1	Carbon Dioxide Emissions and Energy Performance	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy ENG2	Renewable Energy Targets	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	-	-	-
RS Policy WAT1	Water Efficiency	Revocation	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy WAT2	Water Infrastructure	Revocation	?	?	?	0	+	+	0	?	?	0	+	+	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	?	?	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy WAT3	Integrated Water Management	Revocation	+	+	+	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WAT4	Flood Risk Management	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM1	Waste Management Objectives	Revocation	?	?	?	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
RS Policy WM2	Waste Management Targets	Revocation	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy WM3	Imported Waste	Revocation	0	0	0	0	+	+	0	0	0	0	+	+	?	-	+	?	-	+	?	+	+	0	0	0	0	0	0	0	0	0
RS Policy WM4	Regional Waste Apportionment	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM5	Planning for Waste Management	Revocation	0	0	0	?	?	?	0	0	0	?	?	?	?	?	?	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy WM6	Waste Management in Development	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0
RS Policy WM7	Provision for Hazardous Waste and other Regionally Significant Facilities	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM8	Actions for Waste Authorities, Waste Companies and other Partners	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0
RS Policy M1	Land Won Aggregates and Rock	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+
RS Policy CSR1:	Strategy for the Sub-Region	Revocation	+	+	+	+	+	+	+	+	+	0	0	-	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
RS Policy CSR2:	Employment Generating	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
	Development					+	+	+																					
RS Policy CSR3:	Green Belt	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	
RS Policy CSR4:	Transport Infrastructure	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	
RS Policy ETG1:	Strategy for the Sub-Region	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	?	+	
			+	+	+	+	+	+																					
RS Policy ETG2:	Thurrock Key Centre for Development and Change (January 2010 review)	Revocation	+	+	+	0	+	+	0	0	0	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	
RS Policy ETG3:	Basildon Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	-	-	0	-	-	-	-	-	-	0	0	0	0	0	
RS Policy ETG4:	Southend on Sea Key Centre for Dev. and Change	Revocation	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	-	-	-	0	0	0	+	+	

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy ETG5:	Employment Generating Development	Revocation	0	0	0	?	+	+	?	?	?	?	-	-	0	-	-	0	-	-	?	-	-	-	-	-	0	0	0	0	0	0
RS Policy: ETG6	Transport Infrastructure	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy HG1	Strategy for the Sub-Region	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	0	?	-	-	-	-	-	0	0	0	0	0	0
RS Policy HG2	Employment Generating Development	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	0	0	0	0	0	0	?	-	-	-	-	-	0	0	0	0	0	0
RS Policy HG3	Transport Infrastructure	Revocation	0	0	0	?	+	+	0	0	0	0	0	0	?	-	-	0	+	+	-	-	-	0	0	0	0	0	0	0	0	0
RS Policy HG4	Implementation and Delivery	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy: LA1	London Arc	Revocation	?	+	+	?	+	+	0	0	0	?	+	+	?	+	+	?	+	+	?	-	-	-	-	-	?	+	+	?	+	+
RS Policy LA4	Watford Key Centre for Development	Revocation	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
	and Change					+	+	+																								
RS Policy BSE1	Bury St Edmunds Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	+	+	0	+	+	0	0	0	0	+	+	+	0	0	0
RS Policy CH1	Chelmsford Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	-	-	0	-	-	0	+	+	0	+	+	0	-	-	0	-	-	0	0	0	0	0	0
RS Policy GYL1	Great Yarmouth and Lowestoft Key Centres for Development and Change	Revocation	0	0	0	0	+	+	0	0	0	0	-	-	0	+	+	0	-	-	0	-	-	0	-	-	0	0	0	0	0	0
RS Policy HA1	Harlow Key Centre for Development and Change	Revocation	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
RS Policy KL1	King's Lynn Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	-	-	0	-	-	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy NR1	Norwich Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	-	-	-	0	+	+	0	0	0
RS Policy PB1	Peterborough Key Centre for Development and Change	Revocation	0	+	+	+	+	+	0	0	0	0	-	-	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+
RS Policy SV1	Stevenage Key Centre for Development and Change	Revocation	+	+	?	+	+	+	0	0	?	+	+	?	0	+	?	0	+	?	0	-	?	?	?	?	+	+	?
RS Policy TH1	Thetford Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	-	-	-	-	-	+	+	+	+	0	0	0	-	-	0	0	0	0	+	+
MKSM Sub regional Strategy	Bedford/Kempston/Northern Marston Vale	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	?	?	?	?	?	?

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape			
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	
MKSM Sub regional Strategy 2a	Luton/Dunstable/Houghton Regis and Leighton Linlade	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	0	0	0	0	0	0	+	+	+	-	-	-	-	-	-
MKSM Sub regional Strategy 2b	Luton/Dunstable/Houghton Regis and Leighton Linlade	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	?	?	?	?	?	?	

#### 4.2.1 Likely Significant Effects

Revocation of the East of England Regional Strategy will lead to a range of effects across the different SEA topics and over short, medium and long terms as identified in **Appendices D and E**.

A summary of the likely significant effects of revocation on the 13 East of England Plan policy areas are presented below. Where relevant, reference is also made to the Regional Economic Strategy; however, given the duplication of policies and commitments between the two documents, it was considered appropriate to present the findings of the assessment using the broader range of policy issues presented in the East of England Plan. The effects summarised below are for the absolute effects that will occur if the regional strategy were to be revoked (i.e. they are not presented as the marginal difference between retaining and revoking the regional strategy).

#### Core Spatial Strategy

Policies SS1 – SS9 set out the core strategy and overall framework for development in the region. One of the key ambitions of the East of England Plan is to allow the region to accommodate higher levels of growth sustainably, in sustainable ways, including focussing development in ‘Key Centres for Development and Change’ together with policies for individual centres and through selective Green Belt reviews.

The strategy seeks to bring about development which is more sustainable by applying the guiding principles of the UK Sustainable Development Strategy 2005 and contributing to the creation of sustainable communities described in Sustainable Communities: Homes for All. In doing so it sets the overarching framework for the remainder of the East of England Plan.

The assessment has revealed that revocation of the East of England Plan would maintain the positive effects identified as a result of the retention of East of England Plan across many of the SEA topics and those positive effects being significant in relation to biodiversity/flora/fauna, population / health and climatic factors in the short, medium and long term. This reflects in part that the NPPF sets out the presumption in favour of sustainable development which is at the heart of the NPPF and is to be seen as a golden thread running through both plan making and decision taking. The principle of sustainable development which already permeates planning will continue following revocation due to the strong emphasis in the NPPF. The NPPF provides a policy framework at the national level that encourages balanced consideration against all three dimensions of sustainability. For biodiversity for example, it provides for the creation, protection, enhancement and management of networks of green infrastructure and goes beyond the requirements in the current East of England Plan by promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. However the assessment has identified that there are some uncertainties which will depend on whether additional greenfield development is identified to meet future local development needs.

The assessment has also revealed significant positive effects of revocation on coastal and urban fringe areas. In coastal areas the application of Coastal Zone Management will help deliver positive effects whilst in the urban fringe the NPPF provides supportive policy context to deliver Green Infrastructure and support recreation uses in urban fringe areas,

**The assessment has not identified any areas where revocation of those policies which make up the Core Spatial Strategy would have any negative effects – either minor or significant.**

### Economic development

Policies E1 – E7 set out the East of England Plan policies for economic development. The policies aim to ensure that the East of England contributes fully to national, regional and local prosperity and to improve the quality of life of all who live and work in the Region. The East of England Plan supports the continued growth of the region's economy with a key strand being that the most dynamic areas, sectors and clusters lead the region's economic growth and competitive advantage.

The Regional Economic Strategy (RES) sets out targets and priorities to make the East of England an exemplar of sustainable economic growth. The RES is consistent with the East of England Plan and Policies E1 – E7 in the East of England Plan are reflected in the RES and its identified priorities. Of particular relevance to policies E1-E7 are the RES priorities for: 'physical development that meets the needs of a changing economy'; 'increased economic gain from the region's distinctiveness and vitality', 'creating sustainable places for people and business'; and 'increased economic benefit to the region from international gateways'.

The assessment has identified that with the continuity of approach as indicated above, the significant positive effects on population and health through improved job opportunities and other socio economic benefits would continue to be experienced. One of the core planning principles identified in the NPPF is that planning should drive and support sustainable economic development to deliver the homes, businesses, industrial units, infrastructure and thriving local places that the country needs. The NPPF states that '*local authorities should plan proactively to meet development needs of business and support an economy fit for the 21st century*'. In consequence, with revocation of the East of England Regional Strategy, the strong emphasis on supporting economic development and the significant positive effects accruing would continue under the NPPF and be cascaded through local plans and through implementing the duty to cooperate where cross boundary approaches are required.

In support of the assessment, the policies on the indicative targets for employment have been examined in all adopted local plans and/or core strategies in the East of England region (Appendix C). The analysis shows that the indicative targets for net growth in jobs are reflected in local plans or core strategies adopted after the adoption of the East of England Plan, or plans adopted just before the East of England Plan was adopted. So for these 24 local authority areas, in the short term (i.e. including day one of revocation of the regional strategy) there will be no impact of removing the East of England Plan policy as the equivalent targets are already set out within the relevant local plan. For the other 23 local plans in the region, the vast majority allocate land for employment but no direct link is given to the

number of jobs this is intended to support. For these authorities the positive effects may be less or uncertain in the short and medium term. For these authorities, following revocation, there may be a temporary period when they revert to the original (older) Local Plan whilst they develop a replacement and as LEPs take time to become fully established and effective (see sections 2.2.4 and 2.2.5 for information on LEPs). The amount of development anticipated in this period may be lower than if the regional strategy were in place. This will mean that the negative effects associated with development (on biodiversity, water, air, material assets etc) will be lessened as would the beneficial effects (on population). However the assessment has identified that the positive effects would be significant in the longer term. The application of the NPPFs presumption in favour of sustainable development will help where plans or policies are absent, silent or out of date.

The provision of new employment development is likely to have minor negative effects on many of the environmental topics due to the impacts of new building including building on previously undeveloped land. The demand for construction materials and energy is also likely to increase as is traffic in the region and the amount of waste generated. There are likely to be negative effects on, air quality and climatic factors with significant negative effects in relation to material assets. There could potentially be negative effects on historic centres such as Cambridge although the effects on cultural assets are uncertain as they will depend on the location and nature of development. Also, depending on scale and location development may have negative effects on the character of the affected areas including negative effects on habitats, wildlife and landscape. The assessment of Policy E7 relating to the region's airports identifies significant negative effects on climatic factors and material assets - but again these effects are the same for retention and revocation

However the negative effects can be mitigated to a degree through the application of NPPF policies which promotes the pursuit of sustainable development through seeking economic, social and environmental gains.

It is on water that the negative effects are also identified as being significant. Water Quality and Resources is the only topic where the assessment has identified that the revocation of the East of England Plan will have significant negative effects (the same effect has been identified for retention). In the East of England region (along with southern regions), rainfall is comparatively low and per capita water consumption tends to be higher than elsewhere in England. In some areas abstraction is above its sustainable level and this combined with projections for rainfall and demand has led to the classification of all the south eastern areas as seriously water stressed. The key issue relating to water resources is the ability to continue to supply existing developments and deal with forecast growth including economic development without having adverse effects on the environment. The Environment Agency predict that in the future, the conflicting demands for water resources between agriculture, an increasing population, and the environment will increase as climate change makes the region even drier, increasing demand on reducing supplies. Measures to address these negative effects and to meet the challenges of effective water supply and water management in the region as a result of growth will be provided in part through the work of the Water Companies in the region. Further mitigation in the form of initiatives such as the Code for Sustainable Homes, and the NPPF requirement for local authorities to develop proactive strategies to mitigate the effects of climate change should be beneficial in this regard.

Paragraph 21 of the NPPF states that local planning authorities should plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. While not giving explicit examples in the plan, the same positive population benefits would be expected following revocation, although as with the assessment of the revocation of policy E3, within those local authority areas without a core strategy which is consistent with the regional strategy, there may be less development in the short term following revocation which could have fewer benefits over that period for the population by also less effects on the environment. Whether at the regional level this would have a material effect is uncertain.

One of the key planning principles set out in the NPPF is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. However, this should be in accordance with other policies in the NPPF which seek to ensure development is sustainable. This includes minimising impacts on biodiversity and providing net gains where possible (paragraph 109), having access to high quality public transport facilities (paragraph 35) and aiming for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37). This is likely to provide similar significant benefits as retention of the plan.

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

## Housing

Policies H1 – H3 set out the East of England Plan's policies for housing. The policies seek to increase the level of new housing including affordable housing; the provision of sufficient high quality housing to meet the needs of the Region's growing population is a key priority of the East of England Plan. However, since the adoption of the Plan and due to macro-economic circumstances, housing supply has been significantly below that anticipated by the regional targets. Policy H3 deals specifically with Gypsies and Travellers.

The regional ambitions in the RES are consistent with the housing targets in the East of England Plan. The RES states the importance of having high quality, affordable and accessible homes in the right locations to support the region's labour force.

The NPPF seeks to boost the supply of housing through a variety of measures to help ensure that Local Plans meet the full, objectively assessed needs for market and affordable housing in housing market areas as far as is consistent with other policies in the NPPF. Local authorities should consider applications for housing development in the context of the presumption in favour of sustainable development. The NPPF's implementation arrangements which are particularly relevant to housing

(NPPF paragraphs 214 and 215) give weight to plans adopted since 2004 even if there is a limited degree conflict with the NPPF. The assessment has included an assessment of local plans in the East of England region.

The assessment has identified that there would be significant positive effects on population and human health arising from the revocation of the East of England Plan as a result of an increase in housing supply (above current completion rates) where more people are housed with ensuing socio-economic benefits and benefits to health. However, given that 23 (just under half) of local authorities in the East of England have a pre-2008 plan, the changes envisaged and benefits that will accrue from adoption of new Plans will take time, and the benefits may be less significant in the short and medium term. However, with up to date local plans in place and effective implementation of the duty to cooperate then the effects on population and human health are likely to be positive.

The impact will be uncertain in those local authorities that do not have a plan that was in general conformity with the East of England Plan in the short and medium term following revocation, For those authorities without an adopted plan, the East of England Plan provided clarity on the quantum of development required; however, in the short and medium term following its revocation, there is likely to be a temporary period when some local authorities revert to the original Local Plan whilst they develop a replacement. The amount of development anticipated in this period may be lower than if the regional strategy were in place. This will mean that the negative effects associated with development (on biodiversity, water, air, material assets etc) will be lessened as would the beneficial effects (on population). The application of the NPPFs 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.

Meeting the future housing needs of the region as population grows will involve substantial new areas of development and whilst the NPPF encourages local authorities to make effective use of land by re-using land that is previously developed, there will still need to be significant green field developments.

The assessment has indicated that this new development would be likely to have negative effects on a number of SEA topics (biodiversity/ flora/fauna, soils, water, air, climatic factors, material assets, landscape) although there will be uncertainties as the scale and location of development is unknown.

It is on water that the negative effects are identified as being significant. It should be noted that these effects have also been identified for retention (see section 4.3.1).

In the East of England region (along with southern regions), rainfall is comparatively low and per capita water consumption tends to be higher than elsewhere in England. In some areas abstraction is above its sustainable level and this combined with projections for rainfall and demand has led to the classification of all the south eastern areas as seriously water stressed. The key issue relating to water resources is the ability to continue to supply existing developments and deal with forecast growth including economic development without having adverse effects on the environment. The Environment Agency predict that in the future, the conflicting demands for water resources between agriculture, an increasing population,

and the environment will increase as climate change makes the region even drier, increasing demand on reducing supplies.

Measures to address these negative effects and to meet the challenges of effective water supply and water management in the region as a result of growth will be provided in part through the work of the Water Companies in the region. Further mitigation in the form of initiatives such as the Code for Sustainable Homes, and the NPPF requirement for local authorities to develop proactive strategies to mitigate the effects of climate change should be beneficial in this regard.

The Government's planning policy for traveller sites is to be read alongside the NPPF and provides the policy framework for these sites. The assessment has revealed that, as with housing more generally, under the revocation of the East of England Plan there will be significant effects on population and human health as improved provision for gypsy and travellers is secured. However in those areas where Plans were adopted prior to 2008 there may be uncertainty of effects in the short term - as the analysis of adopted plans shows, in some cases the allocations are less than set out in the East of England Plan and others do not have allocations beyond 2011 (see **Appendix C**).

There will be significant positive effects on cultural heritage as the special cultural attributes of these groups are respected. Performance on all other SEA topics is assessed as having no overall effect given the small scale of these sites in a regional context.

**The assessment has shown that the revocation of policies H1 – H3 will result in significant benefits for population and human health although there will be minor negative effects on environmental factors as a result of new housing development.**

## Culture

Policies C1 and C2 set out the East of England Plan's policies for culture covering a wide range of sectors. These two policies provide the policy framework for the support and growth of the region's cultural assets including the provision and location of strategic cultural facilities.

The Region's cultural assets are identified in the RES as adding significantly to the prosperity and economic attractiveness of the region.

The NPPF (paragraph 70) sets out policies to deliver the social, recreational and cultural facilities and services the community needs. It states that local planning authorities should plan positively for the provision and use of shared space, community facilities (such as sports venues and cultural buildings), to enhance the sustainability of communities and residential environments. Paragraph 28 of the NPPF sets this out for rural areas. Policies in the NPPF also seek to promote and conserve cultural heritage, designated landscapes and green infrastructure, which will also contribute to the provision of cultural facilities and the delivery of significant benefits to the population and human health as well as cultural heritage.

**The assessment has identified that that there will be significant positive effects on population/human health as well as cultural heritage. For all other SEA topics the revocation is assessed as having no overall effect.**

There will also be uncertainties as the location and scale of any future cultural development is unknown as decisions will be taken through local plans and in response to specific proposals. The NPPF identifies criteria for cultural development which would help mitigate impacts.

### Regional Transport Strategy

Policies T1 – T15 set out the Regional Transport Strategy. These provide the regional framework for the delivery of transport investment and policy priorities to support the aims of the spatial strategy. The strategy seeks to reduce dependence on car travel; however, it states that transport solutions which manage the use of the car, while improving the scope for alternatives may be the best way to meet demand particularly in urban areas. The Regional Transport Strategy is reflected in the RES which identifies the importance of the region's transport system in supporting economic growth.

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

**The assessment has shown that revocation will maintain the significant positive effects for population and health, air and climatic factors due to improved air quality and reduced potential for greenhouse gas emissions due to the emphasis on sustainable transport modes.** This assessment reflects the positive approach to sustainable transport under the NPPF outlined on the previous paragraph which will be reflected in local plans and decisions by local authorities. Transport networks transcend local authority boundaries and thus effective networks will require local authorities to work together to achieve sustainable approaches – the duty to cooperate provides the mechanism for this to happen.

The Highways Agency will continue to have responsibility for motorways and trunk roads and County Highway authorities and Unitary Authorities will exercise their transport responsibilities in liaison with local authorities and LEPs where appropriate.

Other effects through revocation will be largely neutral or uncertain due to the uncertainty over location of particular elements of transport infrastructure. Many of the effects will depend on the ability to change travel behaviour and the demand for transport. There will also be minor negative effects on material assets due to the use of raw materials for the construction and maintenance of transport infrastructure.

## Environment

Policies ENV1 – ENV 7 set out the East of England Plan’s policies for the natural, built and historic environments of the region. They are intended to be read alongside the Regional Environment Strategy ‘Our Environment, Our Future’ and other regional strategies including the Regional Woodland Strategy. The environment policies in the East of England Plan are consistent with the RES which includes a regional ambition to minimise the environmental and resource–use impacts of economic growth.

The NPPF places great emphasis on the environment. Contributing to the conservation and enhancement of the natural environment and reducing pollution is one of the core planning principles in the NPPF together with conserving heritage assets in a manner appropriate to their significance.

The assessment has shown that under revocation, with the continuance of legal responsibilities (for climate change, for flood risks, for the protection of internationally and nationally designated sites), the application of the NPPF and other Government policy (such as the Natural Environment White Paper), and the statutory responsibilities of other organisations (such as the Environment Agency, Natural England and the water companies), the benefits will be maintained across virtually all of the SEA topic areas with many of the effects being significant. This will lead to significant positive benefits.

It is assumed that local authorities will work together making use of the duty to cooperate and mechanisms such as the Local Nature Partnerships to optimise the benefits to biodiversity and that Biodiversity Action Plan partnerships continue to operate.

## Carbon Dioxide Emissions and Renewable Energy

Policies ENG1 and ENG2 set out the East of England Plan’s policies for CO<sub>2</sub> emissions, energy performance and renewable energy targets. These are consistent with the RES which seeks to reduce greenhouse gas emissions to help put the region at the forefront of tackling climate change.

The NPPF recognises the key role planning plays in helping to secure radical reductions in greenhouse gas emissions. The NPPF supports the move to a low carbon future and identifies a number of ways to help achieve this. Furthermore it puts forward policy approaches to help increase the use and supply of renewable and low carbon energy.

**The assessment has shown that under revocation and with the application of the NPPF positive benefits on climate change would be maintained along with other benefits for population / health and water.**

Policy ENG 2 sets out regional target for 17% of the region’s energy to come from renewable sources by 2020. However there is already in place a 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 UK National Renewable Action Plan 2010 sets out the UK’s path to meet it. While this target is 2% lower than that set out in the East of England Plan, it is not considered likely that revocation would result in significantly different effects than retaining the Plan.

## Water

Policies Wat1 – Wat4 set out the East of England Plan's policies for water. The East of England is the driest region in England with one of the fastest growing populations. The policies in the RSS support water efficiency, the development of appropriate water infrastructure, integrated water management and flood risk management. These policies are closely linked to the RES which identifies water as a vital economic input and the need to incorporate high water efficient standards into future development.

The NPPF (paragraph 156) states that local planning authorities should set out the strategic priorities for their area in the Local Plan, including strategic policies to deliver the infrastructure for water supply and wastewater treatment. Paragraph 162 states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for water supply and waste water and its treatment, and its ability to meet forecast demands. Paragraph 94 of the NPPF is clear that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, water supply and demand considerations amongst others. Paragraph 99 explains that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, taking account of factors such as water supply.

The assessment has identified that with revocation and the application of the NPPF together with other national policies there will be significant benefits for water efficiency, the provision of water infrastructure, integrated water management and flood risk management. The Government's 2011 White Paper 'Water for Life' maintains the commitment for Government to work with the Environment Agency and Ofwat to provide clearer guidance to water companies on planning for the long-term and reducing demand. The Water Resource Management Plan published by Anglian Water in 2010 provides forecasts of the supply-demand balance to enable them to plan to maintain secure water supplies for their domestic and commercial customers. The building regulations will continue to apply. The Code for Sustainable Homes encourages higher levels of water efficiency. Local Authorities can require housing developments in their area to meet specified Code levels.

There are also significant positive effects arising in relation to flood risk due to the very positive approach to flood risk encouraged in the NPPF. For example the NPPF seeks to ensure that inappropriate development is avoided in areas at risk of flooding, but where development is necessary that it is safe without increasing flood risk elsewhere. To this end, local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. Aside from water compatible development and, exceptionally, essential infrastructure, development should not be permitted in the functional floodplain.

Although the impact of these individual policies all bring benefits there is still pressure on water resources across the East of England region which is described in the description of cumulative effects in **Section 4.4**.

## Waste

Policies WM1 – WM 8 set out the East of England Plan's policies for waste. These in part reflect national policy and legislation including seeking to drive the management of waste up the waste hierarchy and de-coupling waste from economic growth. These policies are reflected in the RES which seeks improved resource efficiency through a variety of means including increased levels of recycling.

The NPPF does not have specific waste policies as national waste planning policy is to be published as part of the National Waste Management Plan for England – until this is published the Waste Planning Policy Statement will remain in place. However there are many policies in the NPPF which are relevant to the preparation of waste plans and decisions which should therefore be taken into account.

The assessment has identified a number of significant positive effects in relation to material assets due to the national policy approaches in the PPS10 which seeks to reduce the amount of waste being produced and to use waste as a resource.

Other benefits will arise through regional waste apportionment (WM4) but revocation is going to have no overall effect as waste planning authorities must still comply with national policy. The National Planning Policy Framework also states that waste planning authorities should continue to plan for the waste management needs in their area, taking into account capacity requirements, and that they should continue to monitor waste arisings.

## Minerals

Policy M1 sets out the East of England Plan's policy for minerals. It seeks to safeguard mineral resources and sets out levels of supply for sand and gravel and rock. These policies are reflected in the RES which seeks improved resource efficiency

The NPPF sets out a policy framework to support a sufficient supply of materials to provide for the infrastructure, buildings, energy and goods that the country needs.

The assessment has identified that significant positive benefits are maintained under biodiversity, population / health and soils. These reflect the sustainable approach to mineral extraction and supply which is presented in the NPPF.

## Sub areas and Key Centres for Development and Change

The policies for sub areas and Key Centres for Development and Change are reflected in the RES which identifies seven areas as 'Engines of growth' which will disproportionately drive growth in the region

### *Cambridge Sub Region*

The continued economic success of Cambridge and surrounding areas combined with the protection and enhancement of the historic character and setting of Cambridge which were identified in the assessment

of the RSS are supported by generic policies in the NPPF resulting in the assessment identifying significant positive effects under population / health and cultural heritage with minor positive effects on most other factors. There are also significant benefits under cultural heritage and landscape due to the protection and enhancement of the historic landscape setting of Cambridge which again are supported in principle by national policies in the NPPF.

National planning policy on the use of sustainable transport modes for the movement of goods or people (paragraph 35) will provide significant benefits to air quality and human health in the sub-region. The assessment has assumed that under revocation the duty to cooperate will provide the basis for ongoing cross local authority working to achieve the benefits that the sub region can offer. The effects may be less in the short term whilst inter local authority arrangements under the duty to cooperate are being established.

### *Essex Thames Gateway*

The policy aims to achieve transformational development and change throughout the Essex Thames Gateway (comprising three key centres for development and change).

In the absence of the East of England Plan there will need to be continued multi-local authority working to carry forward the strategy.

The Thames Gateway South Essex Partnership which was developed to assist with the delivery of the strategy has been restructured. As of 1st April 2012 the company limited by guarantee has ceased to operate. A new partnership between the six local authorities covering South Essex has been formed to carry forward the work of driving the economic growth of the area. Leaders / Cabinet members from Basildon Borough Council, Castle Point Borough Council, Essex County Council, Rochford District Council, Southend-on-Sea Borough Council and Thurrock Council form the board of the new partnership.

The assessment has assumed that this partnership and related joint local authority working under the duty to cooperate will be fully effective in implementing the proposals although effects may be limited in the short term while the new arrangements are taking effect.

Substantially increasing the number of jobs and homes, (with significant benefits for the population) promoting excellence in building design and creating townscapes and landscapes of high quality (significant benefits for landscape, particularly given the extent of brownfield land in the sub-region), and protecting and enhancing the quality of the natural and historic environments (minor benefits for biodiversity and cultural heritage).

As with any policy promoting growth and development, there will be adverse effects on material assets resulting from the use of building materials. Given the proposed scale of growth there are potential adverse impacts from limited water availability and a general concern that despite possible improvements in public transport and encouragement to walk and cycle, there will be an overall increase in traffic leading to additional pollutant emissions affecting air and climatic factors.

There are issues with flood risk given the proximity to the River Thames, and the policy's supporting text recognises this. A Strategic Flood Risk Assessment was undertaken on the Plan which takes account of planned flood protection infrastructure.

The scale of development in the sub-region would be unlikely to change in the absence of the East of England Plan. Indeed, recognising that the housing figures are below what are considered to be needed (hence the review which stopped in 2010) - it is likely that growth will be the same or even higher. This would provide the same significant benefits for the population. Depending on the location of the development, given the change in policy in the NPPF on the priority to be given to the use of previously developed land, there could be less concentrated forms of development in urban centres and, where available, more greenfield development. The extent to which this would provide the same benefits to biodiversity, landscape and soil will depend on the eventual location, scale and nature of development.

There will continue to be pressure on scarce water resources and anticipated increases in car transport would further contribute to air pollution and climatic factors. These will need to be mitigated through adherence to other policy requirements within the NPPF.

### *Haven Gateway*

The Haven Gateway sub-region has been identified as a location with substantial potential to grow as a major focus for economic development and growth. The East of England Plan sets out a policy approach covering Tendring district, Colchester, Ipswich and parts of neighbouring districts.

The assessment has identified significant positive effects under population and health arising from the benefits from more housing and jobs particularly in the medium to long term. As a pro-development strategy it will have adverse effects on material assets through the use of construction materials and energy and increased generation of waste. Mitigation through adherence to the future publication of the National Waste Management Plan for England may reduce the scale of effect. The most significant adverse effects are expected to result from increasing demand for water resulting from further development in the sub-region.

Revocation of the policy will leave decisions to local authorities collaborating under the duty to cooperate to bring forward the necessary development across the sub-region in line with the policies in the NPPF. While the long term effects are likely to be the same as retention of the policy, it is possible that there may be some uncertainty in the short term. This is due to the transition period during which the authority will need to establish the arrangements under the duty to cooperate to deliver such strategic policies and then reflect them in their adopted Plans.

However, the Core Strategies for Colchester Borough Council and Ipswich Borough Council (the two major housing growth points) were adopted in December 2008 and December 2011 respectively and are in general conformity with the East of England Plan. This will reduce the level of short term uncertainty in these Boroughs following revocation of the policy.

### *London Arc*

The London Arc is defined as the districts of Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford and Welwyn Hatfield in Hertfordshire and Brentwood and Epping Forest, Essex. Within these areas the emphasis is on retention of Green Belt restraint, supported by more positive green infrastructure (positive for population, biodiversity and landscape) use of neglected areas in accordance with Green Belt purposes; and urban regeneration, including the promotion of greater sustainability within the built-up areas, particularly measures to increase the use of non-car modes of transport. These will have benefits across the SEA themes, while conserving the soil resource through reducing development of greenfield sites. Strategic Green Belt reviews are proposed for Hemel Hempstead, Welwyn Garden City and Hatfield (the effects of which would depend on the outcome of the review and future actions), however, if urban expansion is necessary to deliver the necessary number of houses in the sub-region there is likely to be significant loss of greenfield land with significant adverse effects on soil in the longer term.

Other towns in the London Arc will retain and develop their existing individual roles making as much provision for new development within the built-up area as is compatible with retention and, wherever possible, enhancement of their distinctive characters and identities. This approach is supported by the NPPF which states (paragraph 17) that planning should take account of the different roles and character of different areas and promoting the vitality of main urban areas. This should have benefits for air and climatic factors from reduced need to travel and protect and enhance cultural heritage.

New development, while constrained, is likely to have adverse effects on material assets through the increased generation of waste and the use of construction materials and energy. It is also likely to put additional and increasing pressure on water resources.

The policies in the NPPF provide generic support for the policy approaches set out for the London Arc which focus on regeneration, Green Belt restraint and improved sustainability.

The key centres of Hemel Hempstead, Welwyn Garden City, and Hatfield are all assessed as having significant negative effect in relation to water, due to constrained water supply. These effects are likely to be more significant in the medium and longer term as more development will take place over these periods. Mitigation in the form of other policy guidance contained within the NPPF, such as a requirement for local authorities to develop proactive strategies to take account of water supply and demand (paragraph 94) should be adopted.

Revocation of the policy will leave decisions to local authorities collaborating under the duty to cooperate to bring forward the necessary development (including green infrastructure) across the sub region in line with the policies in the NPPF. While the long term effects are likely to be the same as retention of the policy, it is possible that there will be some uncertainty in the short term. This is due to the transition period in which the authority will need to establish the arrangements under the duty to cooperate to deliver such strategic policies and then reflect them in their adopted Plans.

## Others

The East of England Plan presents policies for the following Key Centres for Development and Change: Bury St Edmunds, Chelmsford; Great Yarmouth; and Lowestoft; Harlow and Kings Lynn. The assessment has identified that there would be benefits in the medium to longer term due to the provision of housing and employment opportunities as well as some negative effects. However, significant negative effects are identified for Chelmsford, Harlow and Thetford due to limitations over water supply in particular and the expectation that further growth will require urban extensions the use of significant quantities of greenfield land and the loss of soil. Growth in traffic, despite policies to encourage non-car transport and other traffic management schemes are likely to have adverse effects on air and climatic factors in the medium to long term.

## Milton Keynes and South Midlands Sub Regional Strategy

The detailed assessment of relevant policies in the Strategy is included in Appendix D. The Strategy provides for the future development and growth of this sub area (which overlaps with the East Midlands and South East of England regions. The Strategy is consistent with the East of England RES which identifies Milton Keynes and South Midlands as one of the seven 'Engines of Growth'.

The assessment has identified that there will be significant positive effects on population and health due to the benefits arising from increased housing and job opportunities. However there will be significant negative effects of water due to increased demands arising from the increased development and population. There are no significant differences between retention and revocation.

### 4.2.2 Other Effects

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

### 4.2.3 Proposed Mitigation Measures

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

Mitigation of the effects will be diverse and may need to be specific sub-regionally. For example, in planning for water provision as part of new development, there may be greater reliance on Water Resource Management Plans and co-operation between interested parties. Similarly, for issues such as biodiversity, continued co-operation and resources could be required to achieve similar commitments to that intended under the East of England Plan regarding for example *'the East of England Regional Assembly and its partners work with authorities in neighbouring regions on strategic natural resource and biodiversity issues in areas such as the Chilterns, the Wash and Thames Estuary'*.

### 4.3 Effects of Retention of the East of England Plan

Retention of the East of England Plan will lead to a range of effects across the different SEA topics and is identified in **Appendices D and E**. A summary of the likely significant effects of revocation on the 13 East of England Plan Policy areas are presented in **Table 4.2** and commented on below. **Table 4.2** summarises the effects of retaining the East of England Plan against the 12 SEA topics. As noted in section 4.2, the Regional Economic Strategy commitments have been mapped onto the RSS policies (**Appendix H**). Due to the intentional overlap between them, the RSS policies include those of the RES and in order to avoid duplication, the assessment summarised in **Table 4.2** has focussed on the East of England Plan policies. Please note that within this alternative, retention is defined as the retention of all the policies within the East of England Plan and all the commitments in the RES but without their future update. Local authorities would be expected to refer to the NPPF and to place greater weight on the NPPF, as the Plan aged, as without update it would gradually lose relevance to the changing circumstances of local communities.

The following key has been used in completing the assessment.

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

Table 4.2 Summary of the Effects of Retention of the East of England Regional Strategy (with reference to the East of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy SS1	Achieving sustainable development	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy SS2	Overall Spatial Strategy	Retention	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+
RS Policy SS3	Key Centres for Development and Change	Retention	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy SS4	Towns other than Key Centres and Rural Areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy SS5	Priority Areas for Regeneration	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy SS6	City and Town Centres	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
			?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	0	0	0	?	?	?	?	?	?	?	?	?
RS Policy SS7	Green Belt	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	0	0	0	?	?	?	?	?	?			
RS Policy SS8	The Urban Fringe	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+
RS Policy SS9	The Coast	Retention	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
RS Policy E1	Job Growth	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-			
RS Policy E2	Provision of Land for Employment	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
RS Policy E3	Strategic Employment Sites	Retention	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	+	+			
RS Policy E4	Clusters	Retention	-	-	-	+	+	+	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-			

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy E5	Regional Structure of Town Centres (Policy adopted July 2010)	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy E6	Tourism	Retention	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	?	?	?	?	?	?
RS Policy E7	The Region's Airports	Retention	-	-	-	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?	?	?	?
RS Policy H1	Regional Housing Provision 2001 to 2021	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-	-	-	-
RS Policy H2	Affordable Housing	Retention	?	?	?	+	+	+	+	-	-	=	=	=	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	?	?	?
RS Policy H3 and H4	Provision for gypsies and travellers, and travelling showpeople (July 2009 Revision)	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy C1 and C2	Cultural development and Provision and Location of Strategy Cultural Facilities	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0
RS Policy T1	Regional Transport Strategy Objectives and Outcomes	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	-	-	-	0	0	0	0	0	0
RS Policy T2 and T3	Changing Travel Behaviour and T3: Managing Traffic Demand	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T4	Urban Transport	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T5	Inter Urban Public Transport	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T6		Retention	0	0	0	+	+	+	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy T7	Transport in Rural Areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T8	Local Roads	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T9	Walking, Cycling and other Non-Motorised Transport	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy T10	Freight Movement	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?			
RS Policy T11	Access to Ports	Retention	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
RS Policy T12	Access to Airports	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	-	-	-	?	?	?	?	?	?	?	?	?			
RS Policy T13	Public Transport Accessibility	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?			

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T14	Parking	Retention	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy T15	Transport Investment Priorities	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
RS Policy ENV1	Green Infrastructure	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV2	Landscape Conservation	Retention	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
RS Policy ENV3	Biodiversity and Earth Heritage	Retention	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
RS Policy ENV4	Agriculture, Land and Soils	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy ENV5	Woodlands	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy ENV6	The Historic Environment	Retention	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
RS Policy ENV7	Quality in the Built Environment	Retention	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+
RS Policy ENG1	Carbon Dioxide Emissions and Energy Performance	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy ENG2	Renewable Energy Targets	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	-	-	-
RS Policy WAT1	Water Efficiency	Retention	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WAT2	Water Infrastructure	Retention	?	?	?	0	+	+	0	?	?	+	+	0	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	?	?	
RS Policy WAT3	Integrated Water Management	Retention	+	+	+	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy WAT4	Flood Risk Management	Retention	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM1	Waste Management Objectives	Retention	?	?	?	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
RS Policy WM2	Waste Management Targets	Retention	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy WM3	Imported Waste	Retention	0	0	0	0	+	+	0	0	0	+	+	+	0	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy WM4	Regional Waste Apportionment	Retention	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM5	Planning for Waste Management	Retention	0	0	0	0	+	+	0	0	0	+	+	+	0	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy WM6	Waste Management in Development	Retention	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy WM7	Provision for Hazardous Waste and other Regionally Significant Facilities	Retention	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy WM8	Actions for Waste Authorities, Waste Companies and other Partners	Retention	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy M1	Land Won Aggregates and Rock	Retention	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy CSR1:	Strategy for the Sub-Region	Retention	+	+	+	+	+	+	+	+	+	0	0	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy CSR2:	Employment Generating Development	Retention	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?
RS Policy CSR3:	Green Belt	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
RS Policy CSR4:	Transport Infrastructure	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy ETG1:	Strategy for the Sub-Region	Retention	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+
RS Policy ETG2:	Thurrock Key Centre for Development and Change (January 2010 review)	Retention	+	+	+	0	+	+	0	0	0	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	0
RS Policy ETG3:	Basildon Key Centre for Development and Change	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	-	-	0	-	-	-	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy ETG4:	Southend on Sea Key Centre for Development and Change	Retention	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	-	-	-	0	0	0	+	+	+
RS Policy ETG5:	Employment Generating Development	Retention	0	0	0	+	+	+	?	?	?	-	-	-	0	-	-	0	-	-	-	-	-	0	0	0	0	0	0
RS Policy: ETG6:	Transport Infrastructure	Retention	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy HG1	Strategy for the Sub-Region	Retention	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0
RS Policy HG2	Employment Generating Development	Retention	?	?	?	+	+	+	?	?	?	-	-	-	0	0	0	0	0	0	?	-	-	0	0	0	0	0	0
RS Policy HG3	Transport Infrastructure	Retention	0	0	0	+	+	+	0	0	0	0	0	-	-	+	+	-	-	-	0	0	0	0	0	0	0	0	0
RS Policy HG4	Implementation and Delivery	Retention	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy: LA1	London Arc	Retention	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
												-	-	-																		
RS Policy LA4	Watford Key Centre for Development and Change	Retention	+	+	+	+	+	+	0	0	0	-	-	-	+	+	+	+	+	+	-	-	-	0	0	0	+	+	+	+	+	+
RS Policy BSE1	Bury St Edmunds Key Centre for Development and Change	Retention	0	0	0	0	+	+	0	0	0	0	0	0	0	+	+	0	+	+	0	0	0	+	+	+	0	0	0	0	0	0
RS Policy CH1	Chelmsford Key Centre for Development and Change	Retention	0	0	0	0	+	+	0	-	-	0	-	-	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	0	0
RS Policy GYL1	Great Yarmouth and Lowestoft Key Centres for Development and Change	Retention	0	0	0	0	+	+	0	0	0	0	-	-	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	0	0
RS Policy HA1	Harlow Key Centre for Development and Change	Retention	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+	0	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
RS Policy KL1	King's Lynn Key Centre for Development and Change	Retention	0	0	0	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0
RS Policy NR1	Norwich Key Centre for Development and Change	Retention	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	-	-	-	0	+	+	0	+	+	0	0	0
RS Policy PB1	Peterborough Key Centre for Development and Change	Retention	0	+	+	+	+	+	0	0	0	0	-	-	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	0	+	+
RS Policy SV1	Stevenage Key Centre for Development and Change	Retention	0	+	+	+	+	+	0	-	-	-	-	-	0	+	+	0	+	+	0	-	-	-	0	0	0	0	0	+	+	+
RS Policy TH1	Thetford Key Centre for Development and Change	Retention	?	?	?	+	+	+	0	-	-	-	-	-	-	-	-	0	0	0	0	-	-	0	0	0	0	0	0	+	+	+
MKSM Sub Regional Strategy	Bedford/ Kempston/ Northern Marston Vale	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?			

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
MKSM Sub Regional Strategy 2a	Luton/ Dunstable/ Houghton Regis and Leighton Linlade	Retention	?	?	?	+	+	+	?	?	?	?	?	?	0	0	0	0	0	0	+	+	+	-	-	-	-	-	-
MKSM Sub Regional Strategy 2b	Luton/ Dunstable/ Houghton Regis and Leighton Linlade	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?

### 4.3.1 Likely Significant Effects

#### Core Spatial Strategy

The effects of retaining these policies will be largely the same as under revocation with positive effects across many of the SEA topics but with those positive effects being significant in relation to biodiversity/flora/fauna, population / health and climatic factors in the short, medium and long term. There are also significant positive effects on landscape in relation to coastal areas and the urban fringe.

The uncertainties which are identified under revocation, relate to the potential effects should additional green field development be identified and would not apply to retention.

With continuity of policy the positive effects of development identified would be experienced in the short and medium term as the amount of development is likely to be higher than under revocation due to the greater clarity over the scale of development needed as set out in the East of England Plan..

The assessment has not identified any areas where retention of those policies which make up the Core Spatial Strategy would have any negative effects – either minor or significant.

However there is the potential for the amount of development to be less in the short and medium term under revocation due to the additional time required to put in place up to date local plans and implement the duty to cooperate, and because in the absence of the East of England Plan there is less clarity over the quantum of new development required. For these reasons effects of retention in the short and medium term are likely to be more pronounced – being either more positive or more negative.

**No significant differences have been identified between revocation and retention.**

#### Economic development

The assessment has identified significant positive effects across all of the economic development policies on population and health through improved job opportunities and other socio economic factors should the RSS be retained.

The uncertainty of effects identified under revocation in the short and medium term would not apply to retention. With continuity of policy under retention the positive effects of development identified would be experienced in the short and medium term as the amount of development is likely to be higher than under revocation due to the greater clarity over the scale and location of development needed as set out in the East of England Plan.

The provision of new employment development is likely to have minor negative effects on many of the environmental topics due to the impacts of new building including building on previously undeveloped land. There are likely to be significant negative effects on the water resources of the region particularly in the southern areas where water availability is the lowest – the scale of the impact will depend on the

type of employment use and its specific water demands. The demand for construction materials and energy is also likely to increase as is traffic in the region and the amount of waste generated. There are likely to be negative effects on air quality and climatic factors with significant negative effects in relation to material assets. There could potentially be negative effects on historic centres such as Cambridge although the effects on cultural assets are uncertain as they will depend on the location and nature of development. Also, depending on scale and location, development may have negative effects on the character of the affected areas including negative effects on habitats, wildlife and landscape.

The assessment of the policy for airports has identified significant negative effects on climatic factors and material assets due to the impact of significant new construction and increased greenhouse gas emissions arising from growth in air transport.

**No significant differences have been identified between revocation and retention. However there is the potential for the amount of development to be less in some areas in the short and medium term under revocation due to the additional time required to put in place up to date local plans and implement the duty to cooperate, and because in the absence of the East of England Plan there is less clarity over the quantum of new development required. For these reasons the effects of retention in the short and medium term may be more pronounced – being either more positive or more negative.**

## Housing

The assessment has identified that there will be positive effects on population and human health as more people are housed with ensuing socio-economic benefits and benefits to health. Retention of the East of England Plan will provide more certainty over the scale of housing development to be provided; however, current completions are at marked variance to the ambitions in the East of England Plan. However, the NPPF which seeks to boost significantly the supply of housing, means that the positive effects on population and human health are likely to prevail in the medium and long term.

Meeting the future housing needs of the region as population grows will involve substantial new areas of development and whilst the Regional Strategy and the NPPF encourage local authorities to make effective use of land by re-using land that is previously developed, there will still need to be significant green field developments. The assessment has indicated that this new development would be likely to have negative effects on a number of SEA topics (biodiversity/ flora/fauna, soils, water, air, climatic factors, material assets, landscape) although there will be uncertainties as the scale and location of development is unknown.

As noted above in relation to the economic policies it is on water that the negative effects are identified as being significant. The assessment has identified that the negative effects on water will be experienced in the short, medium and long term. Measures to address these negative effects and to meet the challenges of effective water supply and water management in the region as a result of growth will be provided in part through the work of the Water Companies in the region. Further mitigation in the form of initiative, such as the Code for Sustainable Homes, and the NPPF requirement for local

authorities to develop proactive strategies to mitigate the effects of climate change should be beneficial in this regard.

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

**No significant differences have been identified between revocation and retention.** However there may be potential for the amount of development to be less in the short and medium term under revocation due to the additional time required to put in place up to date local plans and implement the duty to cooperate, and because in the absence of the Regional Strategy there is less clarity over the quantum of new development required. There could also be uncertainty initially in the provision for gypsies and travellers where local plans need to be updated. For these reasons the environmental effects of retention in the short and medium term may be more pronounced – being either more positive or more negative.

## Culture

The assessment has identified that there will be significant positive effects on population/human health as well as cultural heritage. For all other SEA topics the retention is assessed as having no overall effect.

There will also be uncertainties as the location and scale of any future cultural development is unknown as decisions will be taken through local plans and in response to specific proposals. The Regional Strategy and the NPPF identify criteria for cultural development which would help mitigate impacts.

**No significant differences have been identified between revocation and retention.**

## Regional Transport Strategy

The assessment has shown that retention will lead to significant positive effects for population and health, air and climatic factors due to improved air quality and reduced potential for greenhouse gas emissions due to the emphasis on sustainable transport modes. This assessment reflects the positive approach to sustainable transport in the East of England Plan and under the NPPF. Transport networks transcend local authority boundaries and thus effective networks will require local authorities to work together to achieve sustainable approaches. The duty to cooperate will support the ongoing implementation of the East of England Plan under retention.

Other environmental effects will be largely neutral or uncertain due to the uncertainty over location of particular elements of transport infrastructure. Many of the effects will depend on the ability to change travel behaviour and the demand for transport. There will also be minor negative effects on material assets due to the use of raw materials for the construction and maintenance of transport infrastructure.

**No significant differences have been identified between revocation and retention.**

## Environment

The assessment has shown that retaining the East of England Plan supported by the NPPF there will be benefits across virtually all of the SEA topic areas with many of the effects being significant.

The legal requirement for local planning authorities to ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation would be unchanged by retention.

**No significant differences have been identified between revocation and retention.**

## CO2 Emissions and Renewable Energy

The assessment has shown that under retention with the application of the NPPF there would be positive benefits on climate factors with other benefits for population / health and water.

**No significant differences have been identified between revocation and retention.**

## Water

The assessment has identified that with retention and the application of the NPPF together with other national policies there will be significant benefits to water as the policies move the region towards a more sustainable water management strategy.

The approach to achieving water efficiency will be delivered by mechanisms outside the scope of the East of England Plan such as the building regulations, fiscal measures and incentive schemes – these will all have significant benefits for water availability.

There are also significant positive effects arising in relation to flood risk due to the very positive approach to flood risk encouraged in the Regional Strategy and the NPPF.

The construction of new water infrastructure identified in the East of England Plan could have adverse environmental effects and depending on the location of the new facilities could affect biodiversity, soil, material assets (through the use of building materials) and the landscape. However, some forms of water infrastructure, such as reservoirs, can also have benefits to biodiversity and the landscape.

The assessment identifies significant positive effects under population/human health and water as a result of continued effective flood risk management. This would also result in positive benefits for other SEA topics such as biodiversity and soils.

**No significant differences have been identified between revocation and retention.**

## Waste

The East of England Plan's waste policies respect the European and national policy context and, in seeking to achieve the required shift towards more sustainable waste management, build on principles set out in the Waste Strategy for England and PPS10.

Continuing to drive waste up the waste hierarchy and eliminating the landfilling of untreated municipal and commercial waste by 2021 would have significant positive effects on the population and human health and material assets. Viewing waste as a resource will have significant benefits to material assets for example by replacing primary aggregate with recycled construction waste and making effective use of recovered energy.

Ensuring timely provision of appropriate waste facilities will have significant benefits on human health while reducing the amount of waste imported into the region should reduce traffic levels and have significant benefits for air quality. The reduction in the amount of waste disposed of to landfill will reduce the risk of water contamination and emission of greenhouse gases (i.e. methane). However, modern waste management practice seeks to prevent this.

The Regional Waste Apportionment set out in the East of England Plan reflects national policy requirements for individual authorities to take more responsibility for managing their own waste. The assessment has identified that this approach will have significant air and climate change benefits by reducing the distance waste should travel for recovery or disposal.

**No significant differences have been identified between revocation and retention**

## Minerals

The assessment has identified significant positive benefits under biodiversity / flora/ fauna, population / health and soils. There are also minor landscape benefits. These reflect the sustainable approach to mineral extraction and supply presented in the East of England Plan and the NPPF.

This policy requires minerals planning authorities to plan for a specific amount of aggregate minerals from environmentally acceptable sources. Avoiding harm to designated sites and delivering high quality restoration of all minerals workings will also have a beneficial environmental effect on the biodiversity, landscape and soils topics. The use of aggregate and rock in development will provide significant benefits to the population. However, in those locations where minerals are extracted and through their transportation, there are likely to be negative impacts on many of the SEA topics although the scale and significance of impacts will depend on local circumstances and the ability to introduce effective mitigation measures.

**No significant differences have been identified between revocation and retention.**

## Sub areas and Key Centres for Development and Change

### *Cambridge Sub Region*

The three policies for the Cambridge Sub region seek to deliver significant development in the sub-region, but contain a number of provisions to minimise impacts. The historic character and setting of Cambridge are to be protected and enhanced, together with the character and setting of the market towns and other settlements and the important environmental qualities of the surrounding area.

The assessment has identified significant positive effects under population / health resulting from the level of development and employment planned for the region with minor positive effects on most other factors. There are also significant benefits under cultural heritage due to the protection and enhancement of the historic landscape setting of Cambridge.

Also positive effects have been identified under population/health due to the potential to reduce transport (and hence effect on air quality) but overall effects would depend on the locations selected relative to the homes of employees and other factors. Increased public transport, high levels of cycling and demand management measures could reduce transport by car resulting in air quality, climatic change and health benefits.

Maintaining the Greenbelt around Cambridge could preserve the character of Cambridge and maintain and enhance the quality of Cambridge's setting. This would largely maintain the existing situation with benefits to landscape and cultural heritage, although if the quality of Cambridge's setting was enhanced this could have benefits for cultural heritage in the medium to long term. It will also have benefits across the other SEA criteria (except material assets).

**No significant differences have been identified between revocation and retention although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the Regional Strategy and more clarity over the quantum of new development required.**

### *Essex Thames Gateway*

The seven policies aim to achieve transformational development and change throughout the Essex Thames Gateway (comprising three key centres for development and change). Substantially increasing the number of jobs and homes, (with significant benefits for the population) promoting excellence in building design and creating townscapes and landscapes of high quality (significant benefits for landscape, particularly given the extent of brownfield land in the sub-region), and protecting and enhancing the quality of the natural and historic environments (benefits for biodiversity and cultural heritage). Retaining and making better use of the Green Belt.

As with any policy promoting growth and development, there will be adverse effects on material assets resulting from the use of building materials. Given the proposed scale of growth there are potential significant adverse impacts from limited water availability and a general concern that despite possible

improvements in public transport and encouragement to walk and cycle, there will be an overall increase in traffic leading to additional pollutant emissions affecting air and climatic factors.

There are issues with flood risk given the proximity to the River Thames, and the policies' supporting text recognises this. A Strategic Flood Risk Assessment has been prepared which takes account of planned flood protection infrastructure.

**No significant differences have been identified between revocation and retention although effects in the short term are likely to be more pronounced (+ or -) under retention due to the clarity over the quantum of new development required.**

### *Haven Gateway*

The sub-regional strategy aims to achieve development and change which will develop the diverse economy of the sub-region, including provision for the needs of an expanding tourism sector and recognition of the potential and need for employment growth in the smaller town and provide for major housing growth at Ipswich and Colchester. This will have significant benefits for population through more homes and jobs, particularly in the medium to long term. As a pro-development policy it will have adverse effects on material assets through the use of construction materials and energy and an increased generation of waste.

The Strategy states that priorities for transport in the sub-region should focus on the urban centres of Colchester and Ipswich and on the strategic infrastructure and services to facilitate access to and from the Haven Ports. The policy focus is on minimising the impacts of freight movement to and from the Haven Ports so that the road networks can serve the needs from locally focussed developments, particularly in the main urban areas. The main benefits of this policy are economic rather than environmental and may lead to an increase in traffic with adverse effects on air quality and climatic factors. It may however reduce congestion in urban areas which could have localised air quality and related health benefits.

**No significant differences have been identified between revocation and retention although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the Regional Strategy and more clarity over the quantum of new development required.**

### *London Arc*

The London Arc is defined as the districts of Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford and Welwyn Hatfield in Hertfordshire and Brentwood and Epping Forest, Essex. Hemel Hempstead, Welwyn Garden City and Watford are identified as Key Centres for Development and Change and Policy LA4 provides overall housing growth figures for Watford. Policies LA2 (Hemel Hempstead Key Centre for Development and Change) and LA3 (Welwyn Garden City and Hatfield Key Centre for Development and Change) and the corresponding housing figures for these areas were quashed in the High Court in May 2009 and do not form part of the Regional Strategy.

Within all local authority areas within the Arc the emphasis is on retention of green belt restraint, supported by more positive green infrastructure, use of neglected areas in accordance with green belt purposes; and urban regeneration, including the promotion of greater sustainability within the built-up areas, particularly measures to increase the use of non-car modes of transport. These will have benefits across many of the SEA themes including population and health where the positive effects are identified as significant.

Towns in the London Arc will retain and develop their existing individual roles making as much provision for new development within the built-up area as is compatible with retention and, wherever possible, enhancement of their distinctive characters and identities. This will have positive effects for air and climatic factors from reduced need to travel and greater emphasis on the use of public transport and other sustainable transport modes.

New development is likely to have adverse effects on material assets through the increased generation of waste and the use of construction materials and energy. The key centre of Watford was assessed as having significant negative effect in relation to water, due to constrained water supply. These effects are likely to be more significant in the medium and longer terms as more development will take place over these periods. **No significant differences have been identified between revocation and retention although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the Regional Strategy and more clarity over the quantum of new development required.**

### *Others*

The assessment has identified that there would be benefits in the medium to longer term due to the provision of housing and employment opportunities. However, significant negative effects are identified for Chelmsford, Harlow, Stevenage and Thetford due to limitations over water supply in particular. Growth in traffic, despite policies to encourage non-car transport and other traffic management schemes are likely to have adverse effects on air and climatic factors in the medium to long term. Mitigation in the form of other policies contained within the Regional Strategy combined with the NPPF requirement for local authorities to actively plan to mitigate and adapt to climate change together with complementary initiatives such as the Code for Sustainable Homes will need to be delivered in order to ensure that development does not out-strip water supply.

**No significant differences have been identified between revocation and retention although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the Regional Strategy and more clarity over the quantum of new development required.**

### *Milton Keynes and South Midlands Sub Regional Strategy*

The Strategy provides for the future development and growth of this sub area (which overlaps with the East Midlands and South East of England regions). The Strategy is consistent with the East of England RES which identifies Milton Keynes and South Midlands as one of the seven 'Engines of Growth'.

The assessment has identified that there will be significant positive effects on population and health due to the benefits arising from increased housing and job opportunities. However there will be significant negative effects on water due to increased demands arising from the increased development and population. There are no significant differences between retention and revocation.

#### 4.4 Effects of the Partial Revocation of the East of England Regional Strategy

The reasonable alternatives to revocation that have been assessed are:

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

##### 4.4.1 Revoking all the Quantified and Spatially Specific Policies

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

Table 4.3 Summary of the Effects of Revoking all the Quantified and Spatially Specific Policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy E1	Job Growth	Revocation	-	-	-	?	?	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy E2	Provision of Land for Employment	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RS Policy E3	Strategic Employment Sites	Revocation	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
RS Policy E4	Clusters	Revocation	-	-	-	+	+	+	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-
RS Policy H1	Regional Housing Provision 2001 to 2021	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	-	-	-	?	-	-
RS Policy H2	Affordable Housing	Revocation	?	?	?	+	+	+	+	-	-	=	=	=	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
RS Policy H3 and H4	Provision for gypsies and travellers, and travelling showpeople (July 2009 Revision)	Revocation	0	0	0	?	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy ENG2	Renewable Energy Targets	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	-	-	-
RS Policy WM2	Waste Management Targets	Revocation	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0
RS Policy WM3	Imported Waste	Revocation	0	0	0	?	+	+	0	0	0	?	+	+	?	-	?	?	-	+	?	+	+	+	+	+	0	0	0
RS Policy WM4	Regional Waste Apportionment	Revocation	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy M1	Land Won Aggregates and Rock	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+
RS Policy CSR1:	Strategy for the Sub-Region	Revocation	+	+	+	+	+	+	+	+	+	0	0	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
RS Policy ETG1:	Strategy for the Sub-Region	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	?	+	+
RS Policy ETG2:	Thurrock Key Centre for Development and Change (January 2010 review)	Revocation	+	+	+	0	+	+	0	0	0	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	0
RS Policy ETG3:	Basildon Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	-	-	0	-	-	-	-	-	-	-	-	0	0	0
RS Policy ETG4:	Southend on Sea Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	-	-	-	-	-	-	0	0	0
RS Policy	Strategy for the	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0	0	0	0	?	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
HG1	Sub-Region					+	+	+													-											
RS Policy: LA1	London Arc	Revocation	?	+	+	?	+	+	0	0	0	?	+	+	?	+	+	?	+	+	?	-	-	?	+	+	?	+	+	?	+	+
RS Policy LA4	Watford Key Centre for Development and Change	Revocation	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+
RS Policy BSE1	Bury St Edmunds Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	+	+	0	+	+	0	0	0	0	+	+	+	0	0	0
RS Policy CH1	Chelmsford Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	-	-	0	-	-	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	0	0
RS Policy GYL1	Great Yarmouth and Lowestoft Key Centres for Development and Change	Revocation	0	0	0	0	+	+	0	0	0	0	-	-	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	0	0
RS Policy HA1	Harlow Key Centre for Development and Change	Revocation	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
RS Policy KL1	King's Lynn Key Centre for Development and Change	Revocation	0	0	0	0	+	+	0	+	+	0	-	-	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0	0	0	0
RS Policy NR1	Norwich Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	0	-	-	0	+	+	0	+	+	0	0	0
RS Policy PB1	Peterborough Key Centre for Development and Change	Revocation	0	+	+	+	+	+	0	0	0	0	-	-	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+	0	+	+
RS Policy SV1	Stevenage Key Centre for Development and Change	Revocation	+	+	?	+	+	+	0	0	?	+	+	?	0	+	?	0	+	?	0	-	?	?	?	?	?	?	?	+	+	?
RS Policy TH1	Thetford Key Centre for Development and Change	Revocation	0	0	0	+	+	+	0	-	-	-	-	-	+	+	+	+	+	+	0	0	0	-	-	0	0	0	0	0	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
MKSM Sub regional Strategy	Bedford/Kempston/Northern Marston Vale	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	?	?	?	?	?	?
MKSM Sub regional Strategy 2a	Luton/Dunstable/Houghton Regis and Leighton Linlade	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	0	0	0	0	0	0	+	+	+	-	-	-	-	-	-
MKSM Sub regional Strategy 2b	Luton/Dunstable/Houghton Regis and Leighton Linlade	Revocation	?	-	-	?	+	+	?	-	-	?	-	-	?	-	-	?	-	-	?	-	-	?	?	?	?	?	?

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

### Likely Significant Effects

There are a number of policies where potential significant negative environmental effects have been identified for the revocation of the quantified and spatially specific policies. These include Policy H1 Regional Housing Provision 2001 to 2021, Policy E1 Job Growth and Policy E2 Provision of Land for Employment, Policy E3, Clusters Policy E4 and a range of sub-regional policies including ETG1, HG1, CH1, HA1, TH1 and the MKSM Sub regional Strategy. However, the effects are also identified for retention of the Regional Strategy. Neither alternative will remove the need for more houses, jobs and employment land within the region. The identified effect concerns the substantial increase in consumer demand for water in an already water scarce region. There is also a significant positive effect on the population topic, as the intention of revocation is to boost significantly the supply of housing, for example through initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates to allow communities to meet their local housing needs and share the benefits and mitigate the negative effects of growth.



			Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
RS Policy E2	Provision of Land for Employment	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RS Policy E3	Strategic Employment Sites	Retention	-	-	-	+	+	+	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	+	+
RS Policy E4	Clusters	Retention	-	-	-	+	+	+	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-
RS Policy H1	Regional Housing Provision 2001 to 2021	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	-	-	-
RS Policy H2	Affordable Housing	Retention	?	?	?	+	+	+	+	-	-	=	=	=	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
RS Policy H3 and H4	Provision for gypsies and travellers and travelling showpeople (July 2009 Revision)	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RS Policy ENG2	Renewable Energy Targets	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	-	-	-
RS Policy WM2	Waste Management Targets	Retention	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0
RS Policy WM3	Imported Waste	Retention	0	0	0	0	+	+	0	0	0	0	+	+	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0
RS Policy WM4	Regional Waste Apportionment	Retention	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy M1	Land Won Aggregates and Rock	Retention	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	+	+
RS Policy ETG1:	Strategy for the Sub-Region	Retention	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+
RS Policy ETG2:	Thurrock Key Centre for Development and Change (January 2010 review)	Retention	+	+	+	0	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	-	-	-	0	0	0
RS Policy ETG3:	Basildon Key Centre for	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	-	-	-	0	-	-	-	-	-	0	0	0



			Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
RS Policy PB1	Peterborough Key Centre for Development and Change	Retention	0	+	+	+	+	+	0	0	0	0	-	-	+	+	+	0	0	0	0	-	-	0	+	+	0	+	+
RS Policy SV1	Stevenage Key Centre for Development and Change	Retention	0	+	+	+	+	+	0	-	-	-	-	-	0	+	+	0	+	+	0	-	-	0	0	0	+	+	+
RS Policy TH1	Thetford Key Centre for Development and Change	Retention	?	?	?	+	+	+	0	-	-	-	-	-	-	-	-	0	0	0	0	-	-	0	0	0	0	+	+
MKSM Sub regional Strategy	Bedford/Kempston/Northern Marston Vale	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
MKSM Sub regional Strategy 2a	Luton/Dunstable/Houghton Regis and Leighton Linslade	Retention	?	?	?	+	+	+	?	?	?	?	?	?	0	0	0	0	0	0	+	+	+	-	-	-	-	-	-
MKSM Sub regional Strategy 2b	Luton/Dunstable/Houghton Regis and Leighton Linslade	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
<b>Score Key:</b>	<b>++</b> Significant Positive effect	<b>+</b> Minor positive effect	<b>0</b> No overall effect			<b>-</b> Minor negative effect			<b>--</b> Significant negative effect			<b>?</b> Score uncertain																	
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i></p> <p><i>The reasons for the assessment are presented in Appendix D for each policy.</i></p> <p><i>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (&gt; 5 years)</i></p>																													

### Likely Significant Effects

The retention for a transitional period of policies which set the quantum for development or which are spatially specific where identified to have potential significant negative environmental effects on water and/or material assets. These are for: RS Policy H1 Regional Housing Provision 2001 to 2021; RS Policy E1 Job Growth; RS Policy E2 Provision of Land for Employment; and Policy E3 Strategic

Employment sites and a range of sub-regional policies including RS Policy ETG1, RS Policy HG1, RS Policy HA1, RS Policy NR1, RS Policy SV1, RS Policy TH1 and MKSM Sub regional policy.

The East of England is one of the most water-stressed regions in England. The increased demand for water to meet the needs of the additional employment sites and homes anticipated by the policies was identified to have significant negative effects on the water topic. The increased demand for construction materials and energy together with additional waste generation were considered likely to have significant adverse effects on material assets.

All of the policies above (with the exception of HA1) together with policies H2 Affordable Housing; H3 Provision for Gypsies and Travellers; H4 Provision for Travelling Showpeople and M1 Land Won Aggregates and Rock and a range of sub-regional policies were identified as having significant positive effects on the population and human health resulting from increased opportunities for employment and more homes. Policy ENG2 Renewable Energy Targets was assessed to have significant positive effects on climatic factors through its support for the development of new facilities for renewable power generation, with the aim that by 2010 10% of the region's energy and by 2020 17% of the region's energy should to come from renewable sources.

Policies HA1 Harlow Key Centre for Development and Change and RS Policy SV1 Stevenage Key Centre for Development and Change were also identified as having long term significant negative effects on soil as both were associated with urban extensions in green field sites.

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

As the review of the strategy which stopped in May 2010 clearly demonstrates, the published figures for housing are known to be too high in some areas and too low in others (hence the review). In the absence of a mechanism to review the policies in the future, these shortcomings would remain in place until the policies were revoked.

### Proposed Mitigation Measures

Retaining just the quantitative and spatially specific policies and revoking the rest of the Regional Strategy would remove the measures which were included in the Regional Strategy to mitigate the adverse effects of the proposed development. However, as with revocation of the whole Regional

Strategy, measures to protect the environment are provided through the NPPF, other national policy and legislation. For example, the duty on water companies to produce Water Resource Management Plans and Drought Management Plans will continue to address the issue of water supply in the region whether or not the Regional Strategy is revoked in full, is partially revoked or is retained. Under the Renewables Energy Directive, there is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 in the UK.

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

The assessment has found that there are no policies in the East of England Plan or Regional Economic Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. As noted above for policies H1, E1, E2 and E3 there is a significant negative effect on water resources; however, this is the same issue for both retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the Regional Strategy itself.

4.5 Secondary, Cumulative and Synergistic Effects

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to the secondary, cumulative, synergistic nature of the effects. As a consequence, the potential for the plan for the revocation of the East of England Regional Strategy to have cumulative effects on the region and in conjunction with other regional plans has been considered as part of each assessment and a summary of those effects identified is presented in **Table 4.5** against each of the SEA topics. This assessment is relative to the legislative and policy framework that remains in place once the regional strategies are revoked.

Table 4.5 Cumulative Effects of the Plan to Revoke the East of England Regional Strategy

Assessment Topic	Score	Summary
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)	++/?	Key indicators for biodiversity are the number and extent of protected areas and their condition. In particular, the Natural Environment White Paper states that 90% of priority wildlife habitats should be in recovering or favourable condition by 2020. According to the baseline figures, the 2020 target has already been achieved in the East of England (95.8% in favourable or recovering condition).  The East of England Regional Strategy includes a number of policies that provided protection and enhancement of biodiversity and nature conservation features. Revocation of the East of England Regional Strategy does not affect the legal requirement set out in the Conservation of Habitats and Species Regulations 2012 that a local planning authority must assess the implications of any plan or project likely to have an adverse effect on the integrity of a European site in accordance with the Habitats Directive. The Directive prohibits the adoption of any such plan or project unless it must be adopted for imperative reasons of overriding public interest and there are no alternative solutions. For example, given the continued application of the legal and policy protection given to European and Ramsar sites and to SSSIs and further application of agri-environment schemes it is expected that revocation of the Regional Strategy would not change the positive direction of travel.

Assessment Topic	Score	Summary
		<p>Achievement of legally binding targets for water and air quality will also be significant contributory factors in improving the quality of areas important for wildlife, while enhanced provisions on aspects such as the delivery and protection of green infrastructure will play an important role in increasing the overall area with significant biodiversity value. Statutory and policy protection for AONBs and National Parks will continue to protect the biodiversity value with these areas, at least in so far as the planning system is concerned.</p> <p>Despite the above commitments, it is recognised that there remain localised concerns on the effects on the biodiversity resource, particularly where habitats are water dependent, which could be impacted by direct or indirect effects from the increase demands for water and the effects on the availability of water arising from the effects of climate change. Anglian Water's Water Resource Management Plan seeks to balance such demands, and as it is subject to an appropriate assessment in accordance with the Habitat Directive, the likelihood of post mitigated residual effects remains small, although if they do occur they are most likely to affect non-designated sites and their associated biodiversity.</p>
Population (including socio-economic effects and accessibility)	++/?	<p>The East of England Regional Strategy contains a variety of policies concerning economic development, from employment land provision to housing targets. <b>In consequence, there are a range of significant positive benefits anticipated to accrue to communities. Revocation is unlikely to affect this.</b> One of the key planning principles set out in the NPPF is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. However, this should be in accordance with other policies in the NPPF which seek to minimise environmental effects. This includes minimising impacts on biodiversity and providing net gains where possible (paragraph 109), having access to high quality public transport facilities (paragraph 35) and aiming for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37).</p> <p>Local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. The duty to co-operate is expected to play a key role in this and Local Enterprise Partnerships can also play a key role in assisting local authorities to deliver. This is likely to provide similar significant benefits as retention of the Regional Strategy.</p>
Human Health	+	<p>National health related policies/strategies and programmes are primarily related to improving the health of populations and reducing health disparities. The disparities referred to are primarily geographic, ethnic and economic. The East of England Regional Strategy established sub-regional policies to address specific sub-regional issues associated with employment and regeneration which would have indirect health benefits through creating local employment opportunities, improving housing quality, improving local environmental quality, and seeking to afford greater access to green infrastructure.</p> <p><b>Revocation will not affect the intent of the policy;</b> as noted above, local authorities are required to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. Similarly, revocation will not remove the need for more houses within the region. Indeed it is Government policy to boost significantly the supply of housing, for example through initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth. New homes are to be in locations accessible by sustainable means of transport, walking and cycling in particularly are healthy activities and the NPPF is complementary to national initiatives such as the cycle to work scheme.</p> <p>Paragraph 114 of the NPPF provides for a policy (similar to that within the East of England Regional Strategy) to the creation, protection, enhancement and management of networks of green infrastructure. Indeed, paragraph 117 goes further. In addition, the introduction of Local Nature Partnerships announced in the Natural Environment White Paper which will complement existing local partnerships which deal with matters such as provision of green infrastructure will improve the chances of the delivery of the policy.</p>
Soil and Geology (including land use, important geological sites, and the contamination of soils)	-/?	<p>The main adverse impacts on soil are a result of development and land land cover under arable and horticulture has decreased by 9.1% between 1998 and 2007 across the UK. The East of England Plan policy ENV3 Biodiversity and Earth Heritage sought to provide a framework to manage the loss of such land; however, the effectiveness of such a policy remains unproven.</p> <p>Policies in the NPPF seek to protect best and most versatile land (i.e. ALC Grades 1-3a);</p>

Assessment Topic	Score	Summary
		<p>however, given the very high percentage of agricultural land in the East of England which is classified as best and most versatile and given the scale of likely future development to meet population growth needs, it is likely that some greenfield land will be affected. However, the NPPF also has policies relating to green infrastructure (see discussion on human health above) which will reduce such effects and there remains the overall commitment given in the Natural Environment White Paper to work towards a net gain in the value of nature and to assist with the delivery of green infrastructure.</p> <p><b>At this stage the cumulative effects remain uncertain although likely to be negative in the short term.</b> However, given the target in the Natural Environment White Paper (NEWP) that by 2030 all of England's soils will be managed sustainably and degradation threats tackled successfully along with further research, there remains the potential for this to be addressed in the long term.</p>
<p>Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)</p>	<p>-/--</p>	<p>Water resources are one of the main issues of concern for this region, which is the driest in England. There is a lack of water resources available to meet future demands, and some existing areas already exceed sustainable abstraction limits. Policies existing in the East of England Plan that provided a policy context in which local authorities would need to consider these issues included WAT1, WAT2 and WAT3, regarding water efficiency, water infrastructure and integrated water management. <b>However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation by a range of organisations.</b></p> <p>The NPPF requires under paragraph 94 that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. Paragraph 143 also sets out that local planning authorities will need to establish environmental criteria to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from ...impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality.</p> <p>Water companies, through the completion of the Water Resource Management Plans have a duty to assess water supply and demand in their region on a rolling 5 year basis up to 25 years hence. The water resource planning process sets out, for those water resource zones in deficit (i.e. where demand exceeds supply) the measures needed to address the short fall. In determining future demand, population projections, housing needs and occupancy rates are used along with the effects of climate change on water availability. Preferred management options for each zone are usually a mix of water demand management measures (water metering, voluntary measures), leakage control and with supply measures (boreholes, reservoirs, bulk transfers, desalination plants). For the East of England, the process means that no water zone is anticipated to be in deficit until after 2030.</p> <p>Statutory requirements under the Water Framework Directive will continue to apply and be implemented principally in accordance with River Basin Management Plans, supported by national planning policy. Local authorities should work co-operatively with other authorities, the Environment Agency and water companies to ensure the spatial planning aspects of River Basin Management Plans are applied and the distribution and scale of growth have regard to the capacity of waste water treatment works and WFD requirements</p> <p>Joint and partnership working between the Environment Agency, water industry bodies, local authorities and others must continue in line with the new duty to cooperate in order to deliver water efficiency, management and infrastructure benefits.</p> <p>However, given that the Climate Change Risk Assessment concluded that some of the largest deficits and greatest reductions in the flow of water are projected to be in the East of England, additional effects on water resource remain a residual concern and are scored negatively accordingly.</p>
<p>Air Quality</p>	<p>0/-</p>	<p>The East of England Regional Strategy did not have any specific policies concerning air quality, although it was a component of those policies concerning transport. Whilst air quality in the East of England is relatively good there is a slow deterioration and there are growing pressures on air quality in particular locations, most notably due to the increasing traffic across the region.</p> <p><b>Revocation of the Regional Strategy will not affect the current trend in air quality</b> or the localised effects noted. National planning policies, including those on air quality, sustainable development and transport, will continue to apply and inform local plan policies. More sustainable transport provision and infrastructure and sustainable locations for development should be supported locally through land use and transport planning. Furthermore, in areas of poor air quality</p>

Assessment Topic	Score	Summary
		<p>- including those within, or adjacent to, an Air Quality Management Area - local authorities will continue to work closely with relevant partners to ensure that development has taken proper account of relevant air quality matters.</p>
<p>Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)</p>	<p style="text-align: center;">+</p>	<p>The East of England could be substantially affected by the effects of climate change. The UK Climate Change Risk Assessment notes temperature changes, coastal changes leading to habitat loss and the effects on water resources as matters of concern. The eastern coastal estuaries, vitally important for UK biodiversity may be the most affected by coastal change. The East of England Plan contains two policies (ENG1 and 2) addressing carbon emissions and renewable energy. ENG1 is a policy to encourage the supply of energy from decentralised, renewable and low carbon energy sources, and devolves responsibility to the local authority to determine the appropriate criteria, whereas ENG2 seeks to achieve 17% of the region's energy from renewable sources by 2020.</p> <p><b>Revocation will not affect the intent (to move towards a low carbon economy) behind these policies.</b> One of the 12 core principles of planning set out in paragraph 17 of the NPPF is to support the transition to a low carbon future, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy). Similarly, paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change in line with the provisions of the Climate Change Act 2008.</p> <p>The NPPF seeks to support the move to a low carbon future, by stating that local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions; actively support energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Specifically, local planning authorities are expected to identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supplies. From October 2012, the Green Deal will also improve the energy efficiency of the existing housing stock and supporting the drive to lower carbon emissions from households.</p> <p>There is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 and the UK Renewable Energy Strategy 2009 set out the path to meet it. While this target is 2% lower than that set out in the Regional Strategy, it is not considered likely that revocation would result in significantly different effects than retaining the Regional Strategy.</p> <p>Following revocation of regional strategies, local authorities will be expected to continue to work together across administrative boundaries and with the Environment Agency to plan development that properly minimises the effects of climate change, particularly from flooding and coastal change. For flooding matters, local authorities already have a duty to cooperate under the Floods and Water Management Act 2010. This contains provisions that cover regional working and co-operation such as the establishment of Regional Flood and Coastal Committees and the bringing together of lead local flood authorities (unitary and county councils), who will have a duty to cooperate, to develop local strategies for managing local flood risk. In addition, the Flood Risk Regulations 2009 imposes a duty on the Environment Agency and lead local flood authorities to determine whether a significant flood risk exists in an area and if so to prepare flood hazard maps, flood risk maps and flood risk management plans.</p>
<p>Waste Management and Minerals</p>	<p style="text-align: center;">+/-</p>	<p>The East of England Regional Strategy policies reinforces aspects of national policy that will need to apply across the region if waste generation is to be successfully decoupled from economic growth. It respects the European and national policy context and, in seeking to achieve the required shift towards more sustainable waste management, builds on principles set out in the Waste Strategy for England and PPS10.</p> <p>Ensuring timely provision of appropriate facilities will have significant benefits on human health while reduce the amount of waste imported into the region should reduce traffic levels and have benefits for air quality. The reduction in the amount of waste disposed of to landfill will reduce the risk of water contamination and emission of green house gases (i.e. methane). However, modern waste management practice seeks to prevent this.</p> <p>Viewing waste as a resource will have significant benefits to material assets from example by replacing primary aggregate with recycled construction waste and making effective use of recovered energy.</p> <p>The furtherance of mineral extraction, whilst avoiding any environmental sensitive areas remains a position that allows for further use of a non-renewable resource (and is reflected in the negative</p>

Assessment Topic	Score	Summary					
		score against this topic).					
Cultural Heritage (including architectural and archaeological heritage)	++/-	<p>Currently, the East of England is home to 15% of the total of England's listed buildings and was assessed in 2011 as having the lowest proportion of Grade I and II listed buildings at risk of any region. The East of England Plan policy ENV6 concerned the protection and enhancement of the historic environment.</p> <p><b>Revocation will not affect the intent behind the policy as existing legislation protecting listed buildings, scheduled monuments, conservation areas and registered parks and gardens remain in place.</b></p> <p>Paragraphs 126 - 141 of the NPPF set out strong national policy on conserving and enhancing the historic environment. It states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</p> <p>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.</p> <p>The most important cultural heritage sites are subject to statutory protection. This is supported by national planning policy for the protection and conservation of the historic environment. Following revocation of regional strategies, local authorities would still need to continue to work together on conservation, restoration and enhancement of the heritage and historic environment.</p> <p>In planning for the historic environment, local authorities should continue to draw on available information, including data from partners, to address cross boundary issues; they should also continue to liaise with English Heritage to identify and evaluate areas, sites and buildings of local cultural and historic importance.</p>					
Landscape and Townscape	-	<p>The East of England is home to several landscapes of national importance and landscape conservation was a specific policy in the East of England Plan (ENV2).</p> <p><b>Revocation will not affect the intent behind the policy as existing legislation and policy remain</b> including protections for valued landscapes and nationally designated areas (which are also subject to statutory protection). Paragraph 115 of the NPPF maintains the policy basis for the legislation. The NPPF also maintains the policy previously contained in PPS7 that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged (paragraph 113), while landscape character assessments should be prepared where appropriate (paragraph 170).</p>					
Score Key:	Significant Positive ++	Positive +	No significant effects 0	Negative -	Significant negative --	Uncertain?	No relationship n/a

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

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

In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing difference between authority areas within regions. Tensions may arise, where the duty to cooperate and housing market assessments require an agreed strategy to accommodate growth that is not viewed as equitable by the co-operating authorities. This

could create disparities which are difficult to reconcile without significant interventions. However, under revocation there is also the opportunity for adjacent authorities in previously different regions to explore joint working which may help address some of the potential issues that could arise.

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

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

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

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

## 4.6 In summary

The assessment of the revocation of the East of England Regional Strategy has shown that there will be significant positive effects, although these will be largely similar to those if the Regional Strategy were retained.

For many policies, it is difficult to identify specific differentiation between the effects of retention and revocation, given the strategic nature of the regional strategy policies and the degree to which they already devolved responsibility to local authorities. The provisions of the NPPF means that a basic framework for the delivery of sustainable development is in place which is compatible with the principles

employed in the Regional Strategy. Local plans can therefore readily deliver the aspirations and proposals of the regional strategy, using additional mechanisms such as the duty to co-operate.

Where it occurs, differentiation is most clear in respect of housing and employment allocations where the negative effects of top-down allocations could be tempered by more detailed understanding of environmental capacity issues and possibly more diverse and locally-specific spatial distributions of development (e.g. less reliance on urban extensions). However, revocation does score more uncertainly in the short and medium term. Similar uncertainty was scored for the revocation of policies on provision for gypsies and travellers. This may occur where plans are out of date or due to the transition period for those authorities who need to establish the arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in an adopted plan. The application of the NPPFs 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. The Governments planning policy for traveller sites in conjunction with the NPPF provides national policy on gypsy and traveller provision.

Where it is a policy that provides a strategic direction and whose requirements extend beyond the boundaries of a single authority, such as strategic employment sites, there may be a difference in the short and medium term between retention and revocation. Retention is likely to have significantly positive effects on the population topic and negative effects on biodiversity, air, water and material assets, in part because of the clarity and certainty provided. However, as in the previous example, revocation will score uncertainly term until authorities define, agree and implement the duty to cooperate. However the application of the NPPFs 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.

A number of issues are arguably more efficiently and effectively addressed across wider areas than local authority boundaries, in particular strategic employment sites, major infrastructure provision, biodiversity planning, climate change mitigation and adaptation, and renewable energy. Whilst the duty to cooperate in principle and practice could well address a wide range of strategic issues, there is uncertainty as to how this might work in the short term, both by topic and geographically. For example, securing agreement on housing and employment levels and distribution could be easier (although not universally so) at sub-regional scale than might strategic infrastructure provision on the same or wider scale. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, could be ignored or their potential not realised.

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

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

## 5. Conclusions and Key Findings

### 5.1 What are the Environmental Effects of Revocation of the East of England Regional Strategy?

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

The overall vision of the East of England Regional Strategy is to realise the economic potential of the region and to provide a high quality of life for its people. This includes meeting their housing needs by developing sustainable inclusive communities while at the same time reducing its impact on the environment through savings in energy and water use and by strengthening the stock of regional environmental assets. The policies in the East of England Plan and RES are complementarily designed to achieve this vision.

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

The revocation of the East of England Regional Strategy removes a number of quantitative based policies such as housing where specific dwelling allocations are made to individual local authorities. In the absence of this regional context it will be the responsibility of local authorities to work together under the Duty to Cooperate to best meet the needs of their areas in the most appropriate way having regard to the NPPF and where appropriate other policy and legislation (for example, the Government's planning policy for traveller sites published in March 2012). The Duty to Cooperate will require new ways of working for local authorities and this may lead to some delay in putting in place local plans and other planning policy or in establishing what the development needs are of their area having regard to the needs of others areas as well. An example being their housing market area which is likely to include a number of local authorities. The net effect of this may be a slowing down of development in the short and medium term as the new approaches are implemented - this in turn may lead to a reduction in the positive and negative environmental effects over this short term. The application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.

One area where revocation of the Regional Strategy would lead to significant negative effects is in relation to water and in particular on water supply and it should be noted that similar policy performance

is recorded for the retention alternative. The region is the driest in the country and securing adequate water supply is already a challenge with resources declining – further development of a scale similar to that proposed in the East of England Regional Strategy is likely to have significant negative effects as identified, despite the positive impacts of the individual water policies set out in the Regional Strategy. The effects are likely to be minimised as far as possible through the operation of the region’s water companies and through the application of policies in the NPPF and elsewhere which are designed to secure efficient water usage.

Other significant negative effects are identified in relation to material assets arising from additional economic development including airport developments – in the latter case with significant negative effects for climate change. The same effects are identified for retention and revocation. The assessment has also considered the reasonable alternative of retaining the East of England Regional Strategy. This has resulted in the identification of similar environmental effects to revocation although there are important differences in short term effects as indicated above and potentially longer term as well. Other reasonable alternatives assessed were partial revocation of the East of England Regional Strategy either by

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

The effects of revoking all the quantified and spatially specific policies were identified to be very similar to retaining the Regional Strategy as neither alternative will remove the need for more houses, jobs and employment land within the region. Similarly, the retention of the spatially specific policies will also result in these negative effects but there could be some confusion initially with the intent of the NPPF and how the policies are to be applied.

The assessment found that there are no policies in the East of England Plan or Regional Economic Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit.

## 5.2 **Proposals for Monitoring**

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

CLG's Business Plan<sup>17</sup> under section 5 'Put Communities in charge of planning' includes specific monitoring actions for the department regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised Local Plans. When reviewing the effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the following metrics and sources of information contained in **Table 5.1**. The proposed indicators reflect those identified in the course of the gathering the evidence for this assessment, namely the review of plans, strategies and programmes and collation of baseline information. They are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

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

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

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

- Significant effects on water (RS Policy E1, E2, E3 and H1).

Monitoring measures have also been proposed where there have been uncertain effects identified and these include:

- Uncertain effects on biodiversity (RS Policy SS7, H2, T10, T11, T12, T13, WM1, CSR2, HG2, MKSM 2a).
- Uncertain effects on population and human health (RS Policy SS7, WM5).
- Uncertain effects on soil (RS Policy SS7, E7, T10, T11, T12, T13, WM1, CSR2, ETG1, ETG5, HG2, MKSM2a).
- Uncertain effects on water (RS Policy SS7, T10, T11, T12, T13, WM5, CSR2, MKSM2a).
- Uncertain effects on air (RS Policy SS4, SS7, T11, T14, WM5, CSR2).
- Uncertain effects on climatic factors (RS Policy SS7, T11, T14, CSR2).
- Uncertain effects on materials assets (RS Policy T11, T12, T13, WAT2).
- Uncertain effects on cultural heritage (RS Policy SS7, E1, E3, E7, H2, T10, T11, T12, T13, WM1, CSR2, SV1, MKSM2b).

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<sup>17</sup> CLG May 2012, Business Plan 2012-2015

- Uncertain effects on landscape (RS Policy SS7, E6, H2, T10, T11, T12, T13, WAT2, WM1, CSR2, MKSM, and MKSM2b).

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

**Table 5.1 Potential Environmental Monitoring Indicators**

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
<b>Biodiversity, Flora and Fauna</b>	<p>Annual (where information allows) trends in:</p> <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>	<p>JNCC 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>                      Defra  <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</p>
<b>Population</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>• Employment Information</li> <li>• Population</li> <li>• Housing and additional net dwellings</li> </ul>	<p>Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added                      Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region</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> </ul>	<p>Office of National Statistics on health                      Home Office, Crime Survey for England and Wales                      Department for Communities and Local Government</p>

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> <li>• Deprivation</li> <li>• Access to and quality of the local environment</li> </ul>	statistics: Indices of Deprivation ONS (proposed measures of wellbeing)
<b>Soil and Geology</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Land use</li> </ul>	Department for Communities and Local Government statistics
<b>Water</b>	Annual (where information allows) trends 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> </ul>	Environment Agency & Defra <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a> Anglian Water Anglian Water
<b>Air</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Number of AQMAs</li> <li>• Number of AQMAs were exceedances occurred.</li> </ul>	Defra
<b>Climatic factors</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Emission of greenhouse gases</li> <li>• Number of properties at risk of flooding</li> </ul>	DECC Statistical Release: Local and regional CO2 emissions EA
<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>	EA EA EA East of England Mineral Planning Authorities'
<b>Cultural heritage, including architectural and</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'

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
archaeological heritage		
Landscape and Townscape	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Change in AONBs (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 AONBs English Heritage (if 2003 survey repeated) ONS (proposed measures of wellbeing) DCLG <a href="http://www.communities.gov.uk/documents/housing/xls/1815794.xls">http://www.communities.gov.uk/documents/housing/xls/1815794.xls</a>

### 5.3 Quality Assurance

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

**Table 5.2 Quality Assurance**

Objectives and Context	
The plan’s purpose and objectives are made clear.	Presented in <b>Section 2</b> .
Environmental issues, including international and EC objectives, are considered in developing objectives and targets.	International and European objectives and targets are identified in <b>Appendix E</b> .
SEA objectives are clearly set out and linked to indicators and targets where appropriate.	<b>Section 3.1</b> presents the SEA Topics and Table 5.1 links these to indicators.
Links to other related plans, programmes and policies are identified and explained.	<b>Appendix E</b> identifies relevant plans, programmes and policies.
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	The Consultation Bodies in England <sup>18</sup> were consulted on the scope and level of detail of the environmental reports on 6 May 2011, and were given 5 weeks as required by regulations to respond. The equivalent bodies in the Devolved Administrations were also consulted.  Their comments were used as the basis for deciding the scope and level of detail of the material included in the

<sup>18</sup> The Environment Agency, English Heritage and Natural England

Objectives and Context	
	<p>environmental reports. Consideration was also given to more detailed textual comments provided by the consultation bodies.</p> <p><b>Section 1.5.2</b> presents information on scoping consultation.</p>
The SEA focuses on significant issues.	<b>Section 3.2</b> sets out the scope of the assessment. These issues reflect the views of the scoping consultees as detailed in <b>Section 1.5.2</b> . The significant issues are identified in Appendix E for each of the 12 SEA topics.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	<b>Section 3.5</b> identifies the technical difficulties encountered in completing this report.
Reasons are given for eliminating issues from further consideration.	No issues were eliminated from further consideration.
Alternatives	
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Alternatives were identified in <b>Section 2.4</b> .
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Alternatives were identified in <b>Section 2.4</b> .
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	Refer to <b>Section 4, 5</b> and <b>Appendix D and E</b> .
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Refer to <b>Section 2.4</b> .
Reasons are given for selection or elimination of alternatives.	These are presented in <b>Sections 2.4</b> and <b>5</b> .
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Refer to <b>Appendix E</b> where baseline information is provided for each SEA topic considered.
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practical.	Refer to <b>Appendix C, D and E</b>
Difficulties such as deficiencies in information or methods are explained.	These are stated throughout the report where appropriate.
Prediction and Evaluation of Significant Environmental Effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape) as relevant; other likely environmental effects are also covered as appropriate.	These are set out in <b>Appendix D and E</b> and summarised in <b>Section 4 and 5</b> .
Both positive and negative effects are considered, and the duration of effects (short, medium, or long term) is addressed.	These are set out in <b>Appendix D and E</b> and summarised in <b>Section 4 and 5</b> .
Likely secondary, cumulative and synergistic effects are identified where practicable.	These are set out in <b>Appendix D and E</b> and summarised in <b>Section 4</b> .

Objectives and Context	
Inter-relationships between effects are considered where practicable.	These are set out in <b>Appendix D and E</b> and summarised in <b>Section 4 and 5</b> .
The prediction and evaluation of effects makes use of relevant accepted standards, regulations and thresholds.	Refer to individual topic chapters in <b>Appendix E</b> and <b>Section 3.4.2</b> .
Methods used to evaluate the effects are described.	These are described in <b>Section 3.4</b> .

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

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

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

Objectives and Context	
	consultation in summer 2012.
Decision-making and Information on the Decision	
The Environmental Report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	This will be included in the Post Adoption Statement (to be issued following consultation).
An explanation is given of how they have been taken into account.	This will be included in the Post Adoption Statement (to be issued following consultation).
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	This will be included in the Post Adoption Statement (to be issued following consultation).
Monitoring Measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	These are presented in <b>Section 5.2</b> .
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	Details of this are provided in <b>Section 5.2</b> .
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect).	Details of this are provided in <b>Section 5.2</b> .
Proposals are made for action in response to significant adverse effects.	This will be set out in the Post Adoption Statement (to be published following consultation).

## 5.4 Next Steps

This Environmental Report is presented for consultation until Thursday 20<sup>th</sup> September 2012. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the regional strategies.



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