

# Strategic Environmental Assessment of the Revocation of the South West Regional Strategy

Environmental Report



AMEC Environment & Infrastructure UK Limited

November 2012

This Environmental Report is a consultation document on the likely significant environmental effects of revocation of Regional Planning Guidance for the South West (RPG10) and the South West Regional Economic Strategy (which together form the Regional Strategy in force for the South West region). **Responses on any aspect of the report are invited by Friday 1 February 2013**

This report succeeds the previous environmental report for the revocation of the South West 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 RPG10 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 South West Regional Strategy** contained in the accompanying Environmental Report. The assessment, Environmental Report and NTS have been completed by AMEC E&I UK Ltd on behalf of DCLG.

The following sections:

- explain what the plan is and its implications for the South West region by revoking the South West 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 South West Regional Strategy

The Regional Strategy combines the contents of the **South West Regional Spatial Strategy (Regional Planning Guidance for the South West - RPG10)** and the **South West Regional Economic Strategy**.

RPG10 was first published in September 2001 and set out the planning strategy for the South West region up to 2016 and beyond. It superseded Regional Planning Guidance for the South West that was issued in 1994 and which covered the period to 2011. Following the introduction of the Planning and Compulsory Purchase Act 2004, RPG10 became part of the statutory development plan and was renamed as the Regional Spatial Strategy (RSS). On 1 April 2010 RPG10 subsequently became the Regional Strategy (RS) for the South West together with the Regional Economic Strategy under the Local Democracy Economic Development and Construction Act 2009.

Drawn up in accordance with national policy at the time, RPG10 provides the spatial strategy within which local authority development plans have been prepared. It sets out a broad strategy for the period to 2016 (and beyond) and provides the spatial framework for other strategies and programmes. It includes the Regional Transport Strategy and provides a context for the revision of the Regional Economic Strategy.

The vision for the South West as set out in RPG10 is as follows:

**Developing the region, in a sustainable way, as a national and European region of quality and diversity, where the quality of life for residents, the business community and visitors will be maintained and enhanced.**

The following four aims underpin this vision:

- Protection of the environment;
- Prosperity for communities and the regional and national economy;
- Progress in meeting society's needs and aspirations;
- Prudence in the use and management of resources.

RPG10 seeks to focus new growth in the South West's principal urban areas (PUAs) in order to promote urban renaissance and regeneration, improve accessibility and reduce the need to travel and to drive economic growth. It includes a housing target of 20,200 additional dwellings per annum covering the period 1996 to 2016.

A total of 62 policies are defined to help achieve the wider aims and objectives of RPG10 and deliver the spatial strategy. These policies cover: the overall regional vision and principles for development; the spatial strategy; the natural and built environment; economic development; tourism, culture, leisure and sport; housing; transport; and infrastructure and resources. Further details of the individual policies are set out in **Appendix A**.

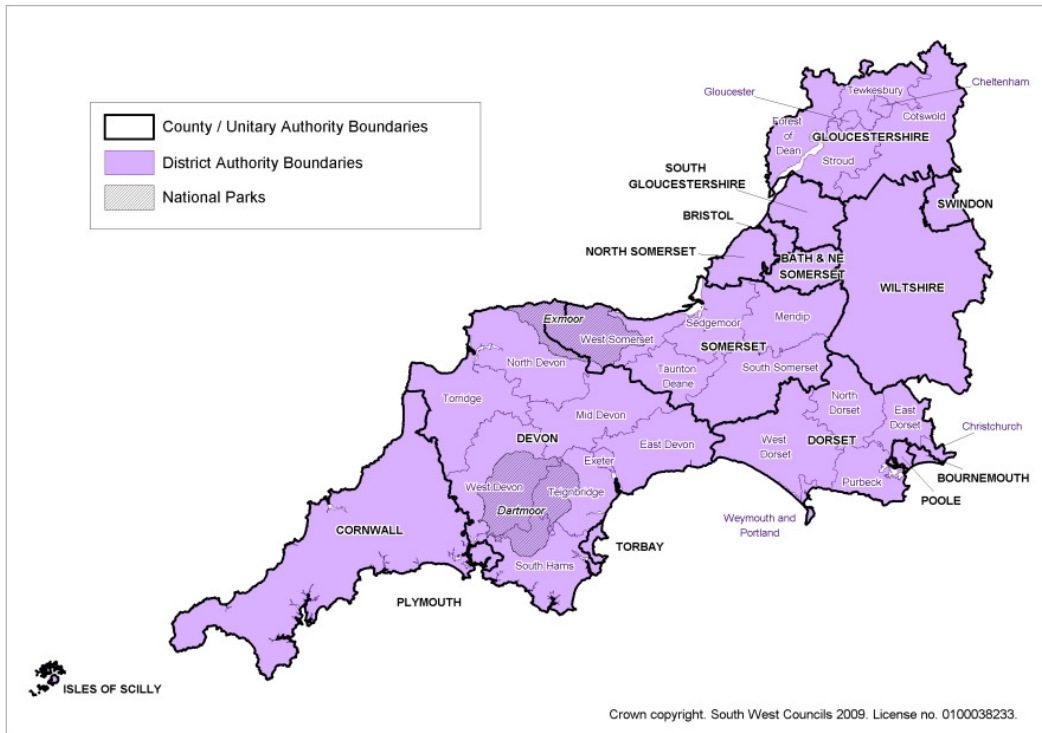
These policies have been put into effect since RPG10 was issued in 2001 through adopted local plans. Meanwhile, however, the policy framework established by the document has been largely superseded as a result of subsequent national planning policy and the adoption by local authorities of policies which begin to depart from it, such as policies more closely aligned to the draft RSS, developed from 2004 onwards. New legislation such as the Floods and Water Management Act 2010 has also impacted upon the operation of the planning system. As a result, RPG10 includes few if any environmental policies which are not now provided for in other ways in policy or in regulation.

In this context, whilst preparation of the draft South West RSS was stopped following Government's announcement of its proposal to revoke regional strategies in July 2010, some local authority plans in the South West have taken account of policies within the draft RSS as it emerged, particularly those plans adopted between 22<sup>nd</sup> July 2008 and 6<sup>th</sup> July 2010 (the period between the publication of the Secretary of State's proposed changes and the Government's announcement of its proposal to revoke regional strategies)<sup>1</sup>. The Secretary of State's proposed changes (hereafter referred to as the 'draft revised RSS') have therefore been reflected within this assessment where appropriate. Further details of the individual policies that comprised the draft revised RSS are set out in **Appendix I**.

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<sup>1</sup> Only limited weight would have been given to the draft RSS in those core strategies adopted prior to the publication of the Secretary of State's proposed changes (given the scope for significant amendments to the emerging plan) and following the announcement of Government of its policy to revoke regional strategies.

Figure NTS 1 The South West Area Covered by RPG10



The **South West Regional Economic Strategy (RES)** was produced in compliance with Section 7 of the Regional Development Act 1998. The primary focus of the RES is to provide a shared vision for the development of the South West's economy to 2015. 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:

**South West England will have an economy where the aspirations and skills of our people combine with the quality of our physical and cultural environment to provide a high quality of life and sustainable prosperity for everyone**

**South West England will demonstrate that economic growth can be secured within environmental limits to bring prosperity to the region.**

This vision is realised through three strategic objectives which in-turn are delivered via eleven headline economic priorities and associated delivery activities. The three strategic objectives are:

- SO1 – Support business productivity;

- SO2 – Strong and inclusive communities;
- SO3 – An effective and confident region.

There is a strong and complementary relationship between RPG10 and the RES:

- the RES vision, drivers and strategic objectives broadly reflect those developed as part of the previous RES (covering the period 2003-2012), which were themselves informed by the spatial strategy set out in RPG10;
- they share an understanding of the spatial priorities of the region, particularly with respect to the need to reduce intra-regional disparities in participation in the economy and education and to regenerate the most disadvantaged areas of the region;
- RPG10 and the RES seek to promote the renaissance of the region's largest cities with emphasis on the West of England sub-region and Bristol in particular, whilst recognising the important role of market towns and rural areas; and
- RPG10 includes policies that support and are consistent with the headline economic priorities outlined in the RES.

The relationship between the RES and RPG10 is set out in more detail in **Appendix H**.

## Strategic Environmental Assessment (SEA) of the plan to revoke the South West 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, has commenced provisions in the Localism Act and made relevant regulations introducing the duty to co-operate between

local authorities and other bodies.<sup>2</sup> In addition, in a judgement<sup>3</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*’. 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 South West 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 South West Regional Strategy published on 20<sup>th</sup> October 2011.

## The South West 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 the State of the Environment in the South West**

SEA Topic	Summary of the Environment and Key Characteristics in the South West
<b>Biodiversity and Nature Conservation</b> (which includes flora and fauna, and the functioning of ecosystems)	<p>The South West hosts 74 Special Areas of Conservation, 17 Special Protection Areas and 10 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. SSSI condition has improved significantly over recent years. As of May 2012, 95.5% of all SSSIs in the region were currently meeting the Government's Public Service Agreement (PSA) target condition of 95% being in favourable or recovering condition</p> <p>Priority habitats present in the region include calcareous grassland, lowland heathland, lowland meadows, saline lagoons and ancient semi-natural woodland. The region also supports 25 species that are internationally important, over 700 that are of national conservation concern, and 34 species endemic to the UK, 11 of which are only found in the South West including lundy cabbage, western ramping fumitory and cornish path moss. 70% of the UK population of greater horseshoe bats occur in the South West and over 25% of the national population of nightjar.</p>
<b>Population</b> (including socio-economic effects and accessibility)	<p>In 2010, approximately 5.3 million people were living in the South West region, which represents 10% of the English total. Locally, population density is highest in the City of Bristol area, at 4,000 people per sq km.</p> <p>Between 2000 and 2010 the population of the South West grew by 7%, faster than the England average. The population increase was the result both of natural change and net inward migration.</p>

<sup>2</sup> S110 of the Localism Act 2011 duty to co-operate in relation to planning for sustainable development

<sup>3</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 South West
	<p>There were 2,403,000 dwellings in the South West in 2011, an increase of 11.2% (242,000 dwellings) since 2000. In the period 2011/12, provisional figures indicate that a total of 16,100 dwellings were completed which represents a significant increase on the volume of completions for 2010/11 (13,680 dwellings) and 2009/10 (14,930 dwellings) although the rate of completions remains below the requirements set out in RPG10.</p> <p>Economically, the South West is one of the most successful regions in the country. It had the fourth highest Gross Value Added (GVA) per head of any region in 2010. However, like other regions the economy of the South West has been affected by the recession with unemployment rates increasing year-on-year since 2008. At a sub-regional level, there are large spatial variations between the northern urban areas and the rest of the region with Swindon and Bristol generating the greatest GVA per head and Cornwall/the Isles of Scilly and Torbay the least.</p>
<b>Human Health</b>	<p>Life expectancy of males and females in the South West has improved since 2004-06 and in 2008-10 the region had the joint highest life expectancy of all the English regions for women (83.5 years), and one of the highest for men (79.5 years). However, there are inequalities in life expectancy within the region with people living in areas of greatest deprivation having shorter life expectancies than those in the least deprived areas.</p> <p>In 2010/11 the total recorded crime rate in the South West was 62.3 offences per 1,000 population, compared to the England rate of 75.1 and the England and Wales rate of 75.7. This was the lowest rate for any region.</p>
<b>Soil and Geology</b> (including land use, important geological sites, and the contamination of soils)	<p>The proportion of agricultural land classified as Good/Moderate (Grade 3) or better is greater in the South West than for England as whole. However, the proportion of land in Grades 1 ('excellent') and 2 ('very good') is less whilst the proportion classified as 'poor' (Grade 4) or 'very poor' (Grade 5) is greater than the national average.</p> <p>In 2007, the South West had a total of 5,960ha of previously developed land (PDL) that was unused or may be available for redevelopment, 44% of which was suitable for housing.</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 South West region is predominantly located within the Environment Agency's South West River Basin District. Parts of the region also fall under the Severn and Thames Basin Districts. Data from the respective River Basin District Management Plans indicates that 46% of all rivers and lakes in catchment areas have good or high biological status while 81% have good or high chemical status.</p> <p>The South West is one of the wettest regions, with prevailing westerly winds bringing moisture-laden air from the Atlantic which falls as rain directly feeding river flows or percolating into the ground. However, some areas of the South West currently face a lack of water available for new abstractions due to unsustainable over-abstraction during the dry summer months, low flows and the future pressures of increased demand due to population growth. On average, each person in the South West uses 150 litres of water per head per day.</p>
<b>Air Quality</b>	<p>Air quality in the region has fluctuated. There are currently 41 Air Quality Management Areas (AQMAs) that have been designated across 22 local authorities in the region. Most AQMAs are established due to high levels of nitrogen dioxide (NO<sub>2</sub>) as a result of traffic.</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 South West's net emissions of CO<sub>2</sub> (by end user) were estimated to be 36 million tonnes, giving an estimate of 6.9 tonnes of CO<sub>2</sub> emissions per capita. This compared to emissions of 43 million tonnes, giving an estimate of 8.3 tonnes of CO<sub>2</sub></p>

SEA Topic	Summary of the Environment and Key Characteristics in the South West
and the ability to adapt)	<p>emissions per capita in 2005.</p> <p>Of all the regions in England, the South West has the second highest number of properties (just over 100,000 properties) at significant risk of flooding from rivers and the sea.</p>
<p><b>Material Assets</b> (Waste Management and Minerals)</p>	<p>The most common mode of waste disposal in the South West is landfill although being 32% lower than in 2001 there is a clear downward trend (reflecting progress towards the Landfill Directive targets).</p> <p>A range of minerals are exploited in the South West, including aggregates such as crushed rock, land and marine won sand and gravel, china and ball clays, and natural building stones. Other minerals found in the region include peat, coal, oil, gas and brick clay.</p>
<p><b>Cultural Heritage</b> (including architectural and archaeological heritage)</p>	<p>The South West region is home to 6,984 scheduled monuments, 89,457 listed buildings, 1,567 conservation areas and 4 World Heritage Sites.</p> <p>In 2011, 2.1% of Grade I and II* listed buildings were deemed to be at risk, lower than the national average. There are a number of towns and cities with important historic centres.</p>
<p><b>Landscape and Townscape</b></p>	<p>The South West has a highly varied landscape that includes high sea cliffs, rolling chalk downland grasslands and open lowland heaths.</p> <p>The region is home to several landscapes of international and national importance. There are two National Parks wholly in the South West, Dartmoor and Exmoor, covering 7% (167,855 ha) of the region, and the region also contains a small part of the New Forest. There are 6 UNESCO endorsed sites of international value. These include 4 World Heritage Sites (Stonehenge and Avebury, Bath, Cornwall and West Devon Mining Landscape, Devon and Dorset Jurassic Coast), the North Devon Biosphere and the English Riviera Global Geopark.</p> <p>There are 11 Areas of Outstanding Natural Beauty (AONB) wholly within the South West that cover 30% (720,030 ha) of the region, plus parts of two others. The region also contains 60% of the 1057km of Heritage Coast in England.</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 6.1% reaching a total of just over 5.5 million by 2020;
- a growth in the number of households living in the region to 2.7 million by 2023;
- an increase in the demand for water of around 1.4% by the 2020s;
- 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); and

- 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 South West 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 56 local plans, the 452 saved structure plan policies, and 22 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 South West 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.

<ol style="list-style-type: none"> <li>1. <b>Biodiversity</b></li> <li>2. <b>Fauna</b></li> <li>3. <b>Flora</b></li> <li>4. <b>Population</b> including demographics, socio-economics</li> <li>5. <b>Human health</b></li> <li>6. <b>Soil</b> including geology and land use</li> <li>7. <b>Water</b> quality (including surface and ground water quality and availability)</li> </ol>	<ol style="list-style-type: none"> <li>8. <b>Air quality</b></li> <li>9. <b>Climatic Factors</b> including climate change and adaptation and flood risk</li> <li>10. <b>Material Assets</b> including waste management and minerals</li> <li>11. <b>Cultural Heritage</b> including architectural and archaeological heritage</li> <li>12. <b>Landscape</b></li> </ol>
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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 South West 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 South West Regional Strategy;
- **Retention** of the South West Regional Strategy but not updating it in the future;
- **Partial revocation** of the South West 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<sup>4</sup> of the plan to revoke the South West Regional Strategy and the reasonable alternatives?

The assessment of the revocation of the South West 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 material assets** due to the extraction and use of aggregates and construction materials to support housing and economic development and associated waste generation. It should be noted that a similar policy performance is recorded for the retention alternative. However, negative effects may be mitigated to a degree through policies in the NPPF including those which seek good design and the sustainable use of materials. PPS10 also seeks to drive waste management up the hierarchy which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, reducing the requirement for primary aggregate.

**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, the fact that RPG10 policies in particular have already been put into effect at the local level and the degree

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<sup>4</sup> This includes consideration of the effects in the short, medium and long term permanent and temporary and positive and negative effects. Secondary, cumulative and synergistic effects are also specifically considered in Table NTS3.

to which responsibilities are already devolved to local authorities which allows them to reflect the broader sustainability principles in their local plans. It is also noticeable that the policy framework set out within the NPPF is broadly compatible with the sustainable development principles employed in the South West Regional Strategy.

**Whilst the duty to co-operate could well address a wide range of strategic issues, it is AMEC's view that there is uncertainty as to how this might work.** 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. However, it is expected that the broad spatial approach set out in RPG10 will continue under revocation. Further, whilst revocation removes a number of quantitative RPG10 policies including structure plan housing requirements, these policies are outdated with associated targets having been superseded by national targets (e.g. in respect of renewable energy) and the policies of more recently adopted, and emerging, local authority plans (based on up-to-date evidence of local circumstances). In this context, it is AMEC's opinion that revocation will provide clarity to local authorities in the region by removing the potentially confusing position created by the presence of outdated policy. One exception to this general rule however is brownfield land. The NPPF does require preferential use of brownfield land and local planning authorities can still set local targets; however, the removal of the specific target within RPG10 could reduce the amount of brownfield land reused for development and could potentially lead to an increase in development on greenfield sites.

It should be noted that the effects of the recent Government housing and planning package changes have not been considered in detail in this assessment as policy detail is still being developed; however, it may prove that the increased emphasis on growth and development given by these proposals serves to increase the annual average rate of house building which currently remains below the requirements set out in RPG10, a trend that is expected to continue in the short to medium term.

The following table presents a summary of the environmental effects of revocation, retention and partial retention of each of the 8 policy areas contained in RPG10. It includes consideration of the short, medium and long term, permanent and temporary, positive and negative effects. These cover a broad range of policy issues and encompass those strategic objectives contained in the Regional Economic Strategy, namely: successful and competitive business; strong and inclusive communities; and an effective and confident region.

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

RPG10 Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
Achieving and Implementing a Regional Vision (Policies VIS1 – VIS4)	Revocation would not detract from the achievement of the Plan's vision and underlying principles and would therefore lead to positive effects across all of the SEA topics.	There would be a similar range of effects to revocation.	No significant effects identified.	No significant effects identified.	No significant effects identified.
The Spatial Strategy (Policies SS1 – SS21)	Revocation of those policies which comprise the Spatial Strategy would have significant positive benefits associated with new housing and economic development.	There would be a similar range of effects to revocation.	There would be a similar range of effects to revocation.	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.	No significant effects identified.
The Natural and Built Environment (Policies EN1 – EN5)	Revocation 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 to a combination of existing statutory environmental protection and the application of the NPPF policies.	There would be a similar range of effects to revocation.	There would be a similar range of effects to revocation.	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.	No significant effects identified.
The Economy (Policies EC1 – EC6)	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 material assets where effects would be significant) would be similar to those of retention. Adverse effects on material assets may be mitigated to a	There would be a similar range of effects to revocation.	There would be a similar range of effects to revocation.	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.	No significant effects identified.

RPG10 Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and spatially-specific policies	Non quantitative and non-spatially specific policies	Policies with significant negative effects
	degree through other policies in the NPPF including those which seek good design and the sustainable use of materials. PPS10 also seeks to drive waste management up the hierarchy which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, replacing primary aggregate.				
Tourism, Culture, Leisure and Sport (Policies TCS1 – TCS2)	With the application of the NPPF, significant positive effects on population/human health as well as cultural heritage would be maintained under revocation.	There would be similar range of effects to revocation.	No significant effects identified.	No significant effects identified.	No significant effects identified.
Housing (Policies HO1 – HO6)	The revocation of the housing policies is unlikely to affect local authorities' provision and planning for housing. The NPPF requires all authorities to objectively assess their own housing markets and make provision accordingly. The negative effects on material assets, noted above have been identified as being significant.	There would be similar range of effects to revocation.	There would be a similar range of effects to revocation.	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.	No significant effects identified.
Transport (Policies TRAN1 – TRAN10)	The revocation of the Regional Transport Strategy is unlikely to affect local authorities' transport infrastructure provision and planning. Significant positive effects for population, health and air have been identified due to improved air quality and the emphasis on sustainable transport modes.	There would be similar range of effects to revocation.	There would be a similar range of effects to revocation.	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.	No significant effects identified.
Infrastructure and Natural Resources	Revocation is unlikely to affect local authorities' planning policy for climate	There would be similar range of effects to	There would be a similar range of effects to	There would be a similar range of effects to	No significant effects identified.



RPG10 Policy Area	Revocation	Retention	Quantified and spatially-specific policies	Partial Revocation	
				Non quantitative and non-spatially specific policies	Policies with significant negative effects
(Policies RE1 –RE6)	change, water resources, minerals and waste management. Significant positive effects have been identified for water, climatic factors and material assets due to a combination of measures from existing statutory requirements and the application of NPPF and PPS10 to policies at the local level.	revocation.	revocation.	revocation although it might result in some confusion with the intent of the NPPF and how the retained policies are to be applied.	

## What are the secondary, cumulative and synergistic effects of the plan to revoke the South West 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 and synergistic effects on the environment. The following table summarises these effects by assessment topic.

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. 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.

**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 South West 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 of protection for the existing biodiversity resource; however, there may be some uncertainties associated with the implementation of the duty to co-operate.  Achievement of legally binding targets for water discharges and air quality

Assessment Topic	Summary Cumulative Effects
	(under the Environmental Permitting Regulations 2010) 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.
<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 due to the presence of the NPPF together with legislation and a range of Local Economic Partnerships with clear commitments and visions to address issues in their respective areas.
<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 South West 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)	<p>The main adverse impacts on soil are as a result of development, and land cover under arable and horticulture has decreased by 9.1% between 1998 and 2007 across the UK. In 2007, the South West had a total of 5,960ha of previously developed land (PDL) that was unused or may be available for redevelopment, 44% of which was suitable for housing</p> <p>Following revocation, given the scale of likely future development to meet population growth needs, it is likely that some greenfield land will be affected. The majority of land in the South West is classified as Grade 3 under Defra's Agricultural Land Classification (ALC) system, with pockets of 1 and 2. Policies in the NPPF seek to protect best and most versatile land (i.e. ALC Grades 1-3a).</p> <p>At this stage the cumulative effects remain uncertain although are likely to be negative. 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>
<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)	Whilst the South West is one of the wettest regions in England, there is potential for negative effects against this topic associated with increasing water demand. These issues are likely to be compounded by the effects of climate change. However, 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 sustainably managed.
<b>Air Quality</b>	Air quality may be affected by new development, particularly in the region's main urban areas due to increased traffic. Revocation of the South West Regional Strategy will not affect this trend.
<b>Climate Change</b> (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	<p>The South West could be substantially affected by the effects of climate change (including increased frequency and severity of flood and storm events). By the 2080's, it is expected that inland flooding will have increased by four to six times compared to present levels, with a 1 in 100 event becoming a 1 in 17 event.</p> <p>Carbon emissions from new development and associated increases in</p>

Assessment Topic	Summary Cumulative Effects
	<p>traffic will contribute to the region's emissions; however, this has been on a declining trend (decreasing from 8.3 tonnes per capita in 2005 to 6.9 tonnes in 2009). Given the range of statutory and policy commitments, along with the NPPF's policy for LPAs to support the move towards a low carbon economy (paragraph 94) and increase the supply of renewable energy (paragraphs 97-99), revocation should continue this overall trend.</p>
<p><b>Waste Management and Minerals</b></p>	<p>Revocation of the South West Regional Strategy will not affect waste management in the region or the provision of future waste infrastructure to meet changing regional needs. The combination of European Directives (notably the Waste Framework Directive and Landfill Directive), Government policy (the 2007 Government Waste Management Strategy and the review of waste policy) and waste planning policy (PPS10) will ensure that waste management is undertaken in a manner consistent with the waste management hierarchy, increasing resource efficiency and reducing waste requiring disposal in landfill (consistent with the Landfill Directive target that local authorities reduce the amount of biodegradable municipal waste (BMW) that they send to landfill to 35% of the 1995 value by 2020).</p> <p>Ensuring the 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).</p>
<p><b>Cultural Heritage</b> (including architectural and archaeological heritage)</p>	<p>The South West's cultural heritage assets are 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.</p>
<p><b>Landscape and Townscape</b></p>	<p>The South West's 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).</p>

## 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 RPG10.

## 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 co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised local plans. When reviewing the environmental effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the 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>

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

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

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
		<a href="http://jncc.defra.gov.uk/page-4235">http://jncc.defra.gov.uk/page-4235</a> <a href="http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF">http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</a> Department for Environment, Food and Rural Affairs (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 (EA) 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 (ONS) reports, specifically Regional Trends and Regional Gross Value Added Department for Communities and Local Government (DCLG) statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region
<b>Human Health</b>	Annual (where information allows) trends in: <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>	ONS statistics on health  Home Office, Crime Survey for England and Wales DCLG 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>	DCLG 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>	EA and Defra <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a> Water Company (various) June Returns Water Company (various) June Returns
<b>Air</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Number of AQMAs;</li> <li>• Number of AQMAs where exceedances occurred.</li> </ul>	Defra Defra

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
<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>	Department for Energy and Climate Change (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 South West Mineral Planning Authorities'
<b>Cultural heritage, including architectural and archaeological heritage</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>% of heritage assets of different types that are at risk.</li> </ul>	English Heritage 'Heritage at risk report'
<b>Landscape and Townscape</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Change in 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 new 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 **Friday 1 February 2013**. 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 coordinated 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 South West 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 South West 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.

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<sup>8</sup> For the purposes of this Environmental Report the Regional Strategy means Regional Planning Guidance for the South West (RPG10), and the Regional Economic Strategy for South West England

## 1.4 Habitats Directive Assessment

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

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

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

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

## 1.5 Consultation and Stakeholder Engagement

### 1.5.1 Overview

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

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

### 1.5.2 Scoping Consultation

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be

included in the environmental reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. Their comments on individual regions have been taken into account in the environmental reports.

They were consulted on the method proposed to assess the likely significant environmental effects of revoking the Regional Strategies which was to take as a starting point the environmental assessment components of the sustainability appraisals carried out when the regional strategies were being prepared. For those regions which had not completed an up-to-date regional spatial strategy, use was also made of the more recent appraisals of the emerging strategy. The assessments followed the format set out in Annex I of the 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). 10 responses dealt specifically with the Environmental Report for the South West - only 5 responses were received from local planning authorities within the South West. A further 69 dealt solely with environmental reports for regions other than the South West. A summary of the 34 consultation responses relevant to the South West environmental report is set out at **Appendix F**.

The main issues raised by respondents on the previous environmental reports, which were relevant to the South West, 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 co-operate; and
- Individual topics (covering data availability, Green Belt, gypsies and travellers, housing supply, heritage, waste, biodiversity, renewable energy, transport, water, brownfield land, the coast, flooding and managed woodland).

A high level summary of the issues raised and the response to those is set out in **Table 1.1** 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	<p>The <b>Environment Agency</b> acknowledged that the majority of their comments provided at the scoping stage had been taken on board, agreed with the overall approach and regarded the assessments as an opportunity to highlight issues that local authorities could address in partnership to achieve sustainable development. They considered that RPG10 had been implemented and was now superseded by national policy and that, similarly, saved County Structure Plan policies had also been superseded, or would be covered in the NPPF.</p> <p><b>English Heritage</b> agreed in principle with the overall approach taken in assessing the likely impacts on the environment as a result of the revocation of RPG10, but had concerns that not all the potential impacts on the</p>	<p>Section 1 of the Environmental Report sets out how the report meets the requirements of the SEA Directive.</p> <p>The impacts of revoking, retaining or partially revoking the Regional Strategy have been assessed in detail in the short, medium and long term against the 12 SEA</p>

Issue	Summary of Consultation Responses to the Previous Environmental Report	Response
	<p>historic environment were fully appreciated and had been taken into account (see reference to the Cornwall and West Devon Mining Landscape World Heritage Site below under Individual Topics). They also considered that there should be acknowledgement of the implications of the loss of the regional tier and the strategic monitoring and assessment of a variety of inter related cumulative impacts over time in order to inform strategic planning in the future.</p> <p><b>Natural England</b> recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. They stated that only some of their comments at the scoping stage had been addressed. Whilst they were disappointed that the assessment did not include the draft RSS, they had no specific comments on the content.</p> <p>Others mentioned that an assessment of reasonable alternatives to complete revocation should have been considered, whilst concern was also expressed about the uncertainty at that time over the content of the emerging NPPF, and the short-term situation between when a regional strategy is revoked and when local plans are adopted. Comment was also made about the consultation process.</p> <p>Some respondents referred to the need to consider the cumulative effects of revocation.</p>	<p>topics, including Cultural Heritage.</p> <p>The impacts of revoking, retaining or partially revoking the Regional Strategy have been assessed in detail in the short, medium and long term against the 12 SEA topics, including Biodiversity.</p> <p>As the draft RSS was not finalised (and therefore not revoked), the Regional Strategy under consideration is RPG10 and the Regional Economic Strategy. However, some local authority plans in the South West have taken account of policies within the draft RSS as it emerged, particularly those adopted between July 2008 and July 2010 (the period between the publication of the Secretary of State's proposed changes and the Government's announcement of its proposal to revoke regional strategies when work on the draft RSS stopped). This has been reflected within this assessment where appropriate.</p> <p>Section 2.4 covers reasonable alternatives to the plan to revoke the Regional Strategies.</p> <p>The NPPF was published in March 2012.</p> <p>The short, medium and long-term effects have been assessed as explained in Section 3.2.3.</p> <p>The Government is to consult on the environmental reports to allow the comments from respondents to be taken into account in the assessments.</p> <p>Section 3.4.4 sets out the approach to the assessment of secondary, cumulative and synergistic effects.</p>
Assessment	<p>The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.</p>	<p>The Environmental Report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the Regional Strategy 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.</p>
Reliance on the NPPF	<p>A number of respondents considered that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.</p>	<p>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.</p>
Policy Change	<p>Several respondents thought that the revocation of RPG10 would weaken certain policies, particularly the delivery of strategic policies.</p>	<p>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</p>

Issue	Summary of Consultation Responses to the Previous Environmental Report	Response
		infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
Reliance on the Duty to Co-operate	<b>Natural England</b> and the <b>Environment Agency</b> welcomed the emphasis given to cross boundary working, although queried how this would work in practice. Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework that was robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Government has introduced a new duty to co-operate and supporting regulations are now in place. Councils who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the NPPF sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The NPPF also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.
Individual Topics	<p><b>English Heritage</b> stated that the Environmental Report failed to refer to the Cornwall and West Devon Mining Landscape World Heritage Site 'Cornish Mining', inscribed on the World Heritage List on July 13 2006, and therefore, did not think that consideration had been given to the impact on the site as a result of the revocation of RPG10.</p> <p><b>Purbeck District Council</b> confirmed that there is no statutory saved policy for the South East Dorset Green Belt in Purbeck District.</p> <p>Respondents raised a number of questions about individual topics, such as the possible impacts on the Green Belt, housing allocations, heritage, biodiversity, renewable energy, transport, water, flooding and coastlines.</p>	<p>The impacts of revoking, retaining or partially revoking the Regional Strategy have been assessed in detail in the short, medium and long term against the 12 SEA topics, including Cultural Heritage.</p> <p>Protecting Green Belt land is covered in section 9 of the NPPF. Policy SS4 of RPG10 required local planning authorities to define and review Green Belt boundaries. The defined boundaries of Green Belts are matters for the local plan. With specific regard to Purbeck District, the Local Plan Final Edition (unadopted 2004) does define the Green Belt boundary and is a material consideration in planning decisions until such time that the Core Strategy is adopted (which is anticipated to be in January 2013).</p> <p>Individual policies for the planning of individual topics is described in the Environmental Report, drawing on the policies set out in the NPPF. For example, paragraph 105 of the NPPF says that authorities should apply Integrated Coastal Zone Management across local authority and land/sea boundaries, as well as identify any area likely to be affected by physical changes to the coast as a Coastal Change Management Area.</p>

## 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 D, 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 Regional Planning Guidance for the South West (RPG10) published by the then Secretary of State in 2001 and the Regional Economic Strategy for South West England published by the South West of England Regional Development Agency in 2006.

The individual policies from RPG10 are presented in **Appendix A**. The whole Plan can be viewed at:

[http://webarchive.nationalarchives.gov.uk/20100505213210/http://www.gos.gov.uk/497666/docs/166217/regional\\_planning\\_guidance](http://webarchive.nationalarchives.gov.uk/20100505213210/http://www.gos.gov.uk/497666/docs/166217/regional_planning_guidance)

The vision, strategic objectives, economic priorities and delivery activities from the Regional Economic Strategy (RES) for South West England are presented in **Appendix H** and the whole RES 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 South West region and the alternatives considered.

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

The National Planning Policy Framework (NPPF) was published on 27 March 2012. This followed extensive consultation during 2011 and replaces government planning policy and mineral policy

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

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

In the absence of the South West Regional Strategy, strategic and cross authority working will be delivered in the South West 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 (PCPA) 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 South West 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<sup>10</sup> 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>11</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. Local Plans should include

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<sup>10</sup> Where authorities work together under section 28 they have the option of establishing a joint committee under section 101 of the Local Government Act 1972. The authorities who are party to the joint committee must also comply with the requirements of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (SI2000 No. 853) as amended by the Local Authorities (Functions and Responsibilities) (Amendment) (No.2) Regulations 2005 (SI2000 No. 714). This means that the joint committee cannot make decisions which are the responsibility of the Authority and not its executive, these must be taken by each constituent authority individually (they include decisions about the submission, adoption and withdrawal of local plans).

<sup>11</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.

strategic policies on certain issues in line with paragraph 156 of the NPPF; however, the list in 156 is not exhaustive and it is for authorities to determine whether there are additional strategic priorities in their areas and what strategic policies should cover.

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

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

### 2.2.3 Local Development Orders (LDOs)

The Planning and Compulsory Purchase Act 2004 allows for the establishment of local development orders. These allow local authorities to extend permitted development rights for certain forms of development with regard to a relevant local development document. The establishment of an LDO potentially speeds up the planning process and provides greater certainty to developers. LDOs are being used extensively across enterprise zones as the main means by which to simplify the planning process. Enterprise Zones are geographically defined areas of approximately 50 - 150 hectares where incentives are being put in place with the objective of stimulating business and job growth. Enterprise Zones have been located on sites where there is strong growth potential that can be reasonably expected by the incentives offered by Government. There are currently 38 LDOs in place across all enterprise zones in England and it is anticipated that there will be a further 40 in progress. Where enterprise zones straddle more than one local authority area, local planning authorities have been working in partnership to create a planning framework for the zone and to simplify planning.

### 2.2.4 Local Enterprise Partnerships

The Government has facilitated the establishment of Local Enterprise Partnerships (LEPs). These are business led locally-owned partnerships between local authorities and businesses providing strategic leadership in driving private sector growth and job creation in their area. There are 39 LEPs now in place covering the whole of the country. These are based around a locally determined economic geography which makes sense to the local business community. All are playing a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs.



LEPs are non-statutory and hold no statutory powers, but they are able to draw upon the powers held by their constituent public bodies.

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

The Government has allocated £730m of Growing Places Fund to 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 South West Region

### Local Enterprise Partnerships in the South West

There are six LEPs in the South West region, namely the West of England, Gloucestershire, Swindon and Wiltshire, Dorset, Heart of the South West and Cornwall and the Isles of Scilly. These are described in more detail below.

#### *West of England*

The West of England LEP covers the areas of Bath and North East Somerset, City of Bristol, North Somerset and South Gloucestershire. The broad vision of the LEP for 2026 is that the West of England area will have:

- one of Europe's fastest growing and most prosperous sub regions which has closed the gap between disadvantaged and other communities – driven by major developments in employment and government backed infrastructure improvements in South Bristol and North Somerset;
- a buoyant economy competing internationally, based on investment by innovative, knowledge based businesses and a high level of graduate and vocational skills;
- a rising quality of life for all, achieved by the promotion of healthy lifestyles, access to better quality healthcare, an upturn in the supply of affordable housing of all types and the development of sustainable communities;

- easier local, national and international travel, thanks to transport solutions that link communities to employment opportunities and local services, control and reduce congestion and improve strategic connections by road, rail and through Bristol Airport and seaport;
- cultural attractions that are the envy of competitor city regions across Europe, making the West of England the place of choice for talented, creative workers and affluent visitors;
- success secured in ways that are energy efficient, protect air quality, minimise and manage waste and protect and enhance the natural and built environment;
- built upon the benefits of its distinctive mix of urban and rural areas; and
- real influence with regional and national government, by demonstrating vision and leadership and delivering these achievements.

Specific activities include:

- Developed a Planning toolkit with 4 local authorities to improve the way large scale and complex planning applications are managed. It promotes good practice in handling planning applications and identifies a series of shared commitments between councils and developers for further improvement, and greater consistency; and
- Bringing forward the Temple Quarter Enterprise Zone- a 70 ha area situated in central Bristol around the Temple Meads Railway Station. Focus on the digital and creative media sector - creating new businesses and attracting investment into Bristol from the UK and internationally.

### *Swindon and Wiltshire*

This LEP encompasses the local authority areas of Swindon and Wiltshire. The LEP's vision is to use the area's unique pivotal location in Southern England in order to create wealth, jobs and new business opportunities within an outstanding landscape that provides an exceptional quality of life. The LEP's unique selling proposition is the economic potential of the military presence in the area and its ambition to be recognised as the national LEP network lead for military/civilian integration. The key objectives are, by 2015, to:

- create 10,000 new private sector jobs;
- safeguard a further 8,000 jobs within the local business base;
- achieve 85% coverage by superfast broadband;
- use new administrative powers to build a supportive economic environment;
- regenerate and improve connectivity between primary population centres;
- identify, allocate and prepare strategic employment sites;
- reduce CO2 emissions per capita; and

- create resilient rural communities served by sustainable transport links – recognising that 66% of the LEP population is located within 5km of a railway station.

### *Gloucestershire*

The Gloucestershire LEP comprises the local authority areas of Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud and Tewkesbury. The LEP's Economic Vision for Gloucestershire 2012-2022 sets out its core aims under the three main headings of promotion, skills and connection:

- Promotion - A quality of working life recognised as the best in Europe:
  - Attract and retain the next generation of talent and build on the expertise of current business professionals;
  - Attract and retain successful, growing businesses; and
  - Sustainably grow key sectors.
- Skills - A highly employable and economically productive population:
  - A culture of enterprise in school, college and university leavers;
  - Businesses that know their future skills needs and invest in their people; and
  - Integrated education and skills sector which delivers for the economy and business.
- Connection - An infrastructure that supports economic growth:
  - Integrated and improved transport infrastructure;
  - Broadband service and use that matches the best in the UK; and
  - A planning system that delivers efficiently and consistently for business.

Specific activities are that it has:

- Delivered an innovative business and schools programme to support future entrepreneurs. The project has reached more than 200 secondary school pupils and next year it is hoped the project will be extended to reach 3500 pupils, including primary school pupils;
- Brought forward a retail pathfinder- working with local authorities to identify issues and options in terms of addressing the retail needs of the partnership area; and
- Brought together 11 banks to provide clear guidance for business and to make access to finance clearer.

### *Dorset*

This LEP covers the local authority areas of Bournemouth, Christchurch, East Dorset, North Dorset, Poole, Purbeck, West Dorset and Weymouth and Portland. The objectives of the Dorset LEP are set out below:

- To improve the performance of existing businesses within Dorset, and to encourage the growth of new ones, for example, through inward investment;
- To enhance the skills of the current and future workforce;
- To improve electronic and physical connectivity, particularly through high speed broadband coverage;
- To create the conditions for enterprise, with an initial focus on establishing an agreed framework for spatial planning.

Specific activities include:

- Receipt of approximately £9M for superfast broadband from BDUK, with all local authorities coming together in the partnership area to commit match funding totalling £10M; and
- The holding of a series of food, drink and tourism roadshows during May 2012 to establish where the sectors are now, where they want to go to and what is needed to get there.

### *Heart of the South West*

The LEP encompasses the local authority areas of East Devon, Exeter, Mendip, Mid Devon, North Devon, Plymouth, Sedgemoor, South Hams, South Somerset, Taunton Deane, Teignbridge, Torbay, Torridge, West Devon and West Somerset. The Heart of the South West LEP has four headline objectives:

- Drive, Productivity and Enterprise;
- Attract New Business and Investment;
- Maximise Employment Opportunities;
- Promote Infrastructure to Connect with Markets.

Specific activities include:

- Working with Broadband Delivery UK (part of DCMS) to provide access to standard broadband to businesses and households in their localities. Projects have already started and the end point should be around end 2013; and
- Chosen by Defra to be one of five Rural Growth Network Pilot Areas. The idea is to test different mechanisms by which Partnerships and local authority partners can support sustainable economic growth in rural areas. The Pilot includes preferential access to the micro-enterprise strand of the Rural Economy Grant (REG) which provides support to dynamic, growing rural enterprises which employ 10 people or less.

### *Cornwall and Isles of Scilly Local Enterprise Partnership*

The Cornwall and Isles of Scilly LEP covers the administrative areas of Cornwall Council and the Council of the Isles of Scilly. The aims of the LEP are set out below:

- Create more jobs, especially higher paid jobs;
- Improve skills amongst everyone in Cornwall and the Isles of Scilly to meet tomorrow's skills needs;
- Help businesses to grow;
- Create a strategic framework that maximises funding opportunities and support for businesses;
- Create an infrastructure in Cornwall that helps businesses to thrive;
- Create a 'can do' enterprise culture;
- Protect the value of the environment;
- Seize the opportunities presented by superfast broadband and the global marketplace; and
- Help overcome the barriers that hold back business growth.

Specific activities include:

- Developing a new local economic strategy- giving businesses and the voluntary sector a real say in its development through the 'Tell Us'-series of road shows challenging businesses of all sizes to take the driving seat;
- Taking forward the Newquay Aerohub Enterprise Zone, a 55ha area split between two sites:
  - i. Aerohub No1 and No2: focus on direct aerospace economic activity; and
  - ii. Aerohub Business Park: focus on businesses that need to be close to the airport for connectivity or the direct aerospace economic activity.

### Joint Working in Plan Preparation

Authorities across the region have worked together in preparing local development plans. Examples of joint working ranges from evidence base development to the preparation of plans covering more than one local authority area. In this context, several authorities in the South West region are currently working together to prepare joint plans including:

- Christchurch and East Dorset (Joint Core Strategy);
- Gloucester, Tewkesbury and Cheltenham (Joint Core Strategy);
- North Devon and Torridge (Joint Core Strategy); and
- West Dorset, Weymouth and Portland (Local Plan).

Joint plans already adopted include the West of England Joint Waste Core Strategy (covering Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire) and the Swindon and

Wiltshire Joint Minerals and Waste Development Frameworks (which currently comprises minerals and waste core strategies and development control policies).

Other examples of joint working on planning issues include the preparation of the Dorset Heathland Joint Development Plan Document.

### Other Partnership Working

**Bristol City Council** is working with the **West of England LEP** and the **Homes and Communities Agency (HCA)** to support the delivery of a new creative industries hub and improved transport links in the heart of the city (the Temple Quarter Enterprise Zone).

The Heartlands project in Cornwall was born out of a community regeneration initiative instigated by **Kerrier Council**, now a part of the unitary **Cornwall Council**. The initiative involved developing the dilapidated Robinsons Shaft tin mine and the surrounding 7.5ha of land into a thriving arts and residential centre for Pool, and as the focal point of a wider local regeneration in partnership with the **Homes and Communities Agency (HCA)**.

The Slapton Line Partnership in south Devon was formed in 2001 and involves **Devon County Council**, **South Hams District Council**, **Natural England**, the **Environment Agency**, **South Devon AONB**, and the local **Wildlife Trust**. The partnership was formed in response to a closure of the coast road for three months due to substantial damage caused by a combination of strong easterly winds, high spring tides and low levels of beach shingle. The Partnership exists to:

- maintain the coast road for as long as reasonably possible;
- support the community as it adapts to live and work with the changing coast, including the temporary and eventual permanent loss of the coast road; and
- to manage the future road closures to the benefit of the community.

**Biodiversity South West** was formed in 1994 (under its original name of the South West Biodiversity Partnership). The vision is *"to have landscapes and water bodies, coasts and seas, towns and cities where wild species and habitats are part of healthy functioning ecosystems; where we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole"*. The partnership includes representatives from Government, local authorities, statutory agencies, non-government organisations and local record centres. There are also 24 **Local Biodiversity Action Partnerships (LBAPs)** in the South West. These range in scale from whole counties/unitary councils to individual districts or cities and towns.

## 2.3 Background and Description of the South West 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 coordinate 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 RPG10 (Regional Spatial Strategy)

Regional Planning Guidance for the South West (known as RPG10) was published by the Secretary of State in 2001. It superseded the Regional Planning Guidance for the South West that was issued in

1994 and which covered the period to 2011. A consultation draft of the Plan, informed by a sustainability appraisal prepared in accordance with policy at the time, was submitted to the Secretary of State in August 1999 and was subject to an Examination in Public. The Secretary of State proposed changes to the Guidance in December 2000 and these went to consultation with a further sustainability appraisal in February 2001<sup>12</sup>.

Following the introduction of the Planning and Compulsory Purchase Act 2004, RPG10 became part of the statutory development plan and was renamed as the Regional Spatial Strategy (RSS). On 1 April 2010 RPG10 subsequently became the Regional Strategy (RS) for the South West together with the Regional Economic Strategy.

Under the Planning and Compulsory Purchase Act 2004, the South West Regional Assembly (the regional planning body) submitted a draft RSS to the Secretary of State in March 2006, accompanied by a sustainability appraisal which met the requirements of an environmental report under the Strategic Environmental Assessment Directive<sup>13</sup>. After the Examination in Public, the Secretary of State proposed changes which were subject to consultation together with a further sustainability appraisal from July 2008<sup>14</sup>. Preparation of the South West RSS was stopped following Government's announcement of its proposal to revoke regional strategies in July 2010 and there is no statutory power available for the Secretary of State to adopt the Plan. However, some local authority plans in the region have taken account of policies within the draft RSS as it emerged. The Secretary of State's proposed changes (hereafter referred to as the 'draft revised RSS') have therefore been reflected within this assessment where appropriate.

### 2.3.3 The Content of RPG10

Drawn up in accordance with national policy at the time, RPG10 provides the spatial strategy within which local authority development plans are to be prepared. It sets out a broad strategy for the period to 2016 (and beyond) and provides the spatial framework for other strategies and programmes. It includes a Regional Transport Strategy and provides a context for the revision of the Regional Economic Strategy.

The vision for the South West as set out in RPG10 is as follows:

**Developing the region, in a sustainable way, as a national and European region of quality and diversity, where the quality of life for residents, the business community and visitors will be maintained and enhanced.**

Four aims underpin this vision (reflecting, at the regional level, the four objectives for sustainable development as set out by Government at the time) supported by twelve objectives. These are

<sup>12</sup> Government Office South West Sustainability Appraisal of Proposed changes to Draft Regional Planning Guidance 10 Final Report Feb 2001 - Baker Associates

<sup>13</sup> Strategic Sustainability Assessment of the Draft South West Regional Spatial Strategy March 2006 - Prepared for South West Regional Assembly by Land Use Consultants with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants

<sup>14</sup> South West Regional Spatial Strategy Proposed Changes Sustainability Appraisal Final Report July 2008 - Prepared for the Secretary of State for Communities & Local Government by Land Use Consultants with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants



summarised in **Table 2.1**.

**Table 2.1 RPG10 Key Aims and Objectives**

Aims	Objectives
Protection of the environment	<p>a. ensuring that the level, distribution and nature of development is consistent with the special character, diversity and distinctiveness of the region and seeks to maximise benefits to the environment.</p> <p>b. safeguarding and enhancing the quality and diversity of the natural, cultural and built environment across the region, while giving the highest level of protection to designated areas and features of national and international importance.</p>
Prosperity for communities and the regional and national economy	<p>c. improving the economic competitiveness of the region by drawing on its strengths and resources and fostering the development of businesses and skills.</p> <p>d. promoting, supporting, enabling and focusing economic development in ways and locations where it can best contribute to meeting local, regional and national needs.</p>
Progress in meeting society's needs and aspirations	<p>e. addressing the wide variations in prosperity between different parts of the region through regeneration and so reducing social exclusion and economic disadvantage, particularly in areas of special need.</p> <p>f. meeting people's requirements for housing, jobs and facilities of good quality and in sufficient measure to provide for all who live and work in the region.</p> <p>g. providing integrated, efficient and environmentally appropriate transport and communications systems to meet local, regional, national and international priorities.</p> <p>h. improving accessibility to jobs and services and ensuring that patterns of future development reduce the need to travel and encourage access by walking, cycling and public transport.</p> <p>i. recognising and encouraging community identity and diversity.</p>
Prudence in the use and management of resources	<p>j. ensuring that development makes the most prudent use of resources created through past investment, both buildings and other infrastructure, especially in urban areas; and that it contributes to new infrastructure provision in partnership with public investment.</p> <p>k. minimising waste and pollution, avoiding loss or damage to irreplaceable natural and cultural assets and safeguarding the region's resources of green fields, biodiversity, primary minerals and water.</p> <p>l. ensuring at all levels of planning integrated relationships between economic activity and housing, both in terms of scale and distribution.</p>

RPG10 seeks to focus new growth in the South West's principal urban areas (PUAs) in order to promote urban renaissance and regeneration, improve accessibility and reduce the need to travel and drive economic growth. It includes a housing target of 20,200 additional dwellings per annum covering the period 1996 to 2016.

A total of 62 policies are defined to help achieve the wider aims and objectives of RPG10 and deliver the spatial strategy. These policies cover: the overall regional vision and principles for development; the spatial strategy; the natural and built environment; economic development; tourism, culture, leisure and sport; housing; transport; and infrastructure and resources. Also included is a framework for implementing, monitoring and reviewing the plan. Further details of the individual policies are set out in **Appendix A**.

These policies have been put into effect since RPG10 was issued in 2001 through adopted local plans.

Meanwhile, however, the policy framework which it provides has been superseded by the evolution of the national planning policy suite and by the adoption by local authorities of differing policies, including those reflecting the draft RSS as it was developed from 2004 onwards. New legislation such as the Floods and Water Management Act 2010 has also impacted on the operation of the planning system. As a result, RPG10 includes few, if any, environmental policies which are not now provided for in other ways in policy or regulation.

In this context, whilst preparation of the South West RSS was stopped following Government's announcement of its proposal to revoke regional strategies in July 2010, some local authority plans in the South West have taken account of policies within the draft RSS as it emerged, particularly those adopted between 22<sup>nd</sup> July 2008 and 6<sup>th</sup> July 2010 (the period between the publication of the draft revised RSS and the Government's announcement of its proposal to revoke regional strategies)<sup>15</sup>. The draft revised RSS has therefore been reflected within this assessment where appropriate. Further details of the individual policies that comprised the draft revised RSS are set out in **Appendix I**.

### 2.3.4 The Content of the Regional Economic Strategy for South West England

The primary focus of the Regional Economic Strategy (RES) is to provide a shared vision for the development of the South West's economy to 2015. 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:

**South West England will have an economy where the aspirations and skills of our people combine with the quality of our physical and cultural environment to provide a high quality of life and sustainable prosperity for everyone**

**South West England will demonstrate that economic growth can be secured within environmental limits to bring prosperity to the region.**

The vision is realised through three strategic objectives which in-turn are delivered via eleven headline economic priorities and associated delivery activities. The three strategic objectives are:

- SO1 – Support business productivity;
- SO2 – Strong and inclusive communities; and
- SO3 – An effective and confident region.

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<sup>15</sup> Only limited weight would have been given to the draft RSS in those core strategies adopted prior to the publication of the Secretary of State's proposed changes (given the scope for significant amendments to the emerging plan) and following the announcement of Government of its policy to revoke regional strategies.

### 2.3.5 The Relationship between RPG10 and the Regional Economic Strategy

Whilst RPG10 was published prior to the RES, there is considered to be a strong and complementary relationship between both documents. This is demonstrated in the mapping of the vision, priorities and delivery activities of the RES and the aims and policies of RPG10 in **Appendix H**. In particular:

- the RES vision, drivers and strategic objectives broadly reflect those developed as part of the previous RES (covering the period 2003-2012), which were informed by the spatial strategy set out in RPG10;
- they share an understanding of the spatial priorities of the region, particularly with respect to the need to reduce intra-regional disparities in participation in the economy and education and regenerate the most disadvantaged areas of the region;
- RPG10 and the RES seek to promote the renaissance of the region's largest cities with emphasis on the West of England sub-region and Bristol in particular, whilst recognising the important role of market towns and rural areas; and
- RPG10 includes policies that support and are consistent with the headline economic priorities outlined in the RES.

### 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 saved structure plan policies in the South West has been updated, to take account of the publication of the NPPF, and the policies are listed in **Appendix B**. With one exception, these saved structure plan policies were either found to be superseded by policies in local plans or reflected in national policy. That exception is Policy 6 of the Somerset and Exmoor Joint Structure Plan Review (1991-2011) which relates to the Bristol/Bath Green Belt, and the Government is proposing to retain only until an up-to-date local plan is adopted by Mendip District Council.

### 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>16</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 one quarter of the 39 local planning authorities in the South West have adopted development plan documents under the PCPA 2004.

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

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

A list of local plans in the South West region<sup>17</sup> and their current composition is included at **Appendix C**. There are a total of:

- 39 local authorities with adopted local plans. These include two unitary authorities where, pending completion of their own core strategies, the local plan comprises the adopted core strategies and other development plan documents and/or adopted local plan saved policies of 10 former local authorities. One part of the unitary authority of Cornwall (former Kerrier District Council) does not have an adopted local plan in place, but instead relies on approved documents;
- 35 local authorities with local plans adopted following the publication of RPG10 in September 2001. Of these 13 authorities have adopted Core Strategies, plus an adopted South Wiltshire Core Strategy (covering part of the unitary authority of Wiltshire Council) that are in conformity with both the requirements of the 2004 Planning and Compulsory Purchase Act and the policies set out within RPG10 of which 1 was adopted between 22 July 2008 and 6 July 2010;<sup>18</sup>

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<sup>16</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.

<sup>17</sup> There are 39 local planning authorities (LPA) within the region.

<sup>18</sup> Adopted core strategies will be in general conformity with the Regional Strategy. Out of the 39 local authorities, there are 5 LPAs that do not currently have a local plan adopted shortly before or after the publication of RPG10 or have an adopted core strategy in addition to the former local authorities of Kerrier District Council and Carrick District Council. 1 Core Strategy (Poole) was adopted between the publication of the draft revised RSS and Government's announcement of the revocation of regional strategies (when work on the draft RSS was stopped).

- 20 minerals and waste plans, of which 18 were adopted following the publication of RPG10 with 1 adopted between 22 July 2008 and 6 July 2010<sup>19</sup>.

## 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 South West 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 South West 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 South West Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke RPG10

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<sup>19</sup> Wiltshire Council and Swindon Borough Council Joint Waste and Minerals Core Strategies were adopted in June 2009.

entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see **Appendix F**) including partial revocation. These were:

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

A number of alternatives are therefore considered as follows:

- **Retention:**
  - Retention of the South West Regional Strategy but not updating it in the future; or
  - Retention of the South West 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 South West 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 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 South West Regional Strategy.

Each alternative is discussed below in regard to its reasonableness.

## 2.4.1 Retention

### Retention of the South West Regional Strategy but Not Updating it in the Future

This option would mean that the South West Regional Strategy was not revoked, that all the policies within RPG10 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 Regional 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 RPG10 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. HO1 on housing allocations.

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 RPG10 unless material considerations indicate otherwise, this also adds potential conflict with the policies set out in the NPPF.

Since there is no statutory power available for the Secretary of State to update the South West 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 South West 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 South West 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 South West Regional Strategy

This option would mean that the South West Regional Strategy was not revoked, that RPG10 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 South West 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.**

This situation exists notwithstanding the fact that the draft revised RSS for the South West (incorporating

the then Secretary of State's Proposed Changes) was published in July 2008 for public consultation following an earlier consultation of the draft proposals in June 2006 and an Examination in Public over the period April to July 2007. Whilst the draft RSS was never adopted, the strategy's advanced preparation and consultation process meant that it did start to form a material planning consideration that informed the preparation of local development plans. However, the Localism Act means that the Secretary of State does not have the statutory powers to effectively replace RPG10 with the draft revised RSS.

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 South West 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 South West 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 RPG10 policies for housing allocations and mineral allocations) 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 South West 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/county in the region (i.e. housing allocations and mineral 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 South West Regional Strategy that establish a quantum of development or land for development to a particular location and/or local authority/county in the South West region may result in some confusion with the intent of the NPPF 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 South West Regional Strategy, and planning decisions need to be made in line with RPG10 unless material considerations indicate otherwise, this could create confusion and potential conflict in the planning system.

Nevertheless, the retention of the quantified policies or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority/county 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 RPG10 (as part of the development plan) unless material considerations indicate otherwise. This could create 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 strategy, environmental protection, water resources and the high level apportionment policies on housing. 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. Indeed, under the system that existed before the Localism Act 2011, a draft RSS for the South West was advanced. The weight to be given to the policies in RPG10 is likely to reduce as the evidence that informed them becomes out of 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 South West Regional Strategy would mean that individual policies, ambitions and/or priorities would be retained if revoking them may lead to likely significant negative environmental effects once mitigating measures have been taken account.

This reasonable alternative would lead to the retention of individual policies in the Regional Strategy which are not likely to be in conflict with the National Planning Policy Framework, do not undermine the localist approach to plan making and decision making and, if removed, would result in a significant environmental impact, even taking account of mitigation. 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 South West Regional Strategy;
- **Retention** of the South West Regional Strategy but not updating it in the future;
- **Partial revocation of the South West 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 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 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>20</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 required under Article 3(1), an environmental report shall be prepared</p>	<p>An Environmental Report was prepared for each region. Each considered the likely significant effects of revoking the Regional</p>

<sup>20</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>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>Strategy within the context of wider reforms to the planning system. This included the publication of the NPPF, decentralising planning powers to local authorities, and introducing a duty to co-operate to support local authorities in both delivering for their local communities and addressing strategic cross-boundary issues.</p>
<p><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 South West Regional Strategy. 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 Directive Annex I(f) topics and presenting this in separate topic chapters;
- Providing additional information on the details of the plan to revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others;
- Providing additional information in the assessment of revocation and retention of each Regional Strategy policy explicitly against all 12 of the SEA Directive Annex I(f) topics;
- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects;
- Providing additional information on likely secondary, cumulative and synergistic effects of the plan to revoke the regional strategies;

- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy;
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate; and
- Providing further information that includes proposals to monitor any significant effects.

This SEA of the plan to revoke the South West 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>21</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; and
- ‘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>21</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	Material Assets (including waste management and minerals).
Cultural heritage, including architectural and archaeological heritage	Cultural Heritage (including architectural and archaeological heritage)
Landscape	Landscape and Townscape

### 3.2.2 Geographic Scope of the Assessment

The SEA considers the effects revocation, partial revocation or retention of the Regional 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, in general, a defined limit to the duration of the assessment. In the case of the South West Regional Strategy however; paragraph 1.3 of RPG10 defines this duration as being the period to 2016 ‘and beyond’. Taking this into account, and in order to ensure consistency with the SEAs being undertaken in respect of the revocation of the other regional strategies, the duration of the assessment has been defined as being approximately out to 2021.

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

It should be noted that in practice when applying the definitions of the different terms within the assessment, the boundaries between terms are more flexible than a strict reading of the definitions implies. There are for example, instances where effects in the short term extend for a limited period into the medium term. Where this occurs, it is recorded in the assessment commentary although it will still be only assessed as short term in the assessment matrix itself (see Section 3.4 for an explanation of the approach to the assessment).

### 3.3 Context and Baseline

#### 3.3.1 Review of Plans and Programmes

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

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

#### 3.3.2 Collecting Baseline Evidence

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

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

As the sustainability appraisal prepared in support of RPG10 is considerably out of date (and was prepared in accordance with policy at the time which has been subsequently superseded), a primary source of information has been the published sustainability appraisal report that accompanied the draft RSS for the South West. 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, the Office of National Statistics and the South West Observatory.



### 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 co-operate; and
- **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>22</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

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<sup>22</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online at: <http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

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
- **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 .....

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	
																											Mitigation Measures ..... Assumptions ..... Uncertainty .....	
Revocation																											Etc	

<b>Score Key:</b>	<b>++</b> Significant Positive effect	<b>+</b> Minor effect positive	<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 in the colour used. 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**

<b>Effect</b>	<b>Description</b>	<b>Illustrative Guidance</b>
<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 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>
<b>--</b>	Significant negative	<ul style="list-style-type: none"> <li>Alternative would have a 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>
<b>?</b>	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 RPG10) 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 co-operate. Where this is the case, specific local examples of current cooperation are also cited where available. Revocation of regional strategies and the reliance on the NPPF creates a situation where there will be a delay, as some authorities will need to review and update their local plan to reflect NPPF policies and the needs of their local communities. In these instances where there is a lack of an up to date local plan, it is the opinion of AMEC that the uncertainty over policy, including the quantum and preferred location of development, is likely to affect whether developers submit planning applications for new development. As a result, it is expected that there will be a lessening in the short and medium term on development activity and the resulting effects occurring; although it is noted that the application of the 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. Further, as the majority of local plans within the South West have been in place since RPG10 was published, the extent to which this situation applies to the South West is considered to be less than for the other regions;
- **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 RPG10 (and draft revised RSS for completeness) on housing allocations, allocations of pitches for gypsies, travellers and showpeople, employment (both jobs and employment land), renewable energy, aggregates and waste apportionment 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 Regulations 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**.

### Considering the Effects of the Regional Economic Strategy

The vision, strategic objectives, economic priorities and delivery activities of the former Regional Economic Strategy (RES) have been presented in **Appendix H** and have been mapped onto the policies of the former RPG10. The mapping demonstrates that the RES and RPG10 are inextricably linked. 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>23</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 new effect that could be greater than the sum of the individual effects.

\*Adapted from SEA guidance, ODPM (2005)

For the assessment of secondary, cumulative and synergistic effects to be effective, they should be considered as part of each assessment, rather than to being seen as a separate assessment. For the

<sup>23</sup> This includes consideration of the effects in the short, medium and long term; permanent and temporary and positive and negative effects.

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 county or 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 to medium term, based on the actual figures to date, this may lead to a lessening of some effects identified in the accompanying Sustainability Appraisal (both benefits of increased housing provision and any negative effects arising from land take and loss of any natural resources); however, we have assumed that over the lifetime of the Regional Strategy that the housing policy will still be delivered and that the long term effects would remain unchanged by the short to medium 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 although as noted in Section 3.4.3 above, in the case of the South West the majority of local plans within the region have been in place since RPG10 was published such that there is not expected to be any significant difference in effects between retention and revocation in the short to medium 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;
- **For the purposes of providing a consistent interpretation of short, medium and long term, the definitions, as set out in section 3.2.3, have been applied.** The definitions of short, medium and long term reflected the assumption that for the purposes of the assessment, revocation was considered to occur concurrent with when the assessment was undertaken. This minimised the need to speculate over when exactly the regional strategies could be revoked, was compatible with the Government’s policy to rapidly abolish the Regional Strategies subject to the outcome of the consultation process, enabled the

assessment to optimise the use of baseline information as evidence to inform the assessment of effects and enabled the assessment to consider the effects during any transitional period. The approach was also consistent with current SEA guidance and practice;

- **It 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.

It should be noted that the effects of the recent Government housing and planning package changes have not been considered in detail in this assessment as policy detail is still being developed; however, it may prove that the increased emphasis on growth and development given by these proposals serves to increase the annual average rate of house building which currently remains below the requirements set out in RPG10, a trend that is expected to continue in the short to medium term.

## 3.5 Technical Difficulties

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

Until the European Court judgement<sup>24</sup> in March 2012, the legal understanding was that SEA was applied to the preparation and modification of relevant plans and programmes. The ruling confirms the application of the SEA Directive to the revocation of land use plans. Whilst there is guidance and relatively well established processes available to assess the effects of a plan's preparations, there is no equivalent for revocation and no established practice on how to undertake such an assessment. Necessarily then, this assessment is part of a body of emerging practice and is one of the first such that is in compliance with the SEA Directive requirements in the UK.

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

### 3.5.2 Ensuring Consistency

The assessment of effects, in particular of retention of the Regional Strategy has used information from the relevant sustainability appraisal of each Regional Strategy. Whilst each sustainability appraisal has been completed in a manner consistent with government guidance, they are different in approach, format and assessment of effects which has created difficulties in ensuring that the assessment of the plan to revoke regional strategies is consistent across all eight regions. For example, some appraisals have assessed the effects of each proposed policy (South East Plan, East of England Plan) whilst others present the assessment findings thematically (the North East). Furthermore, the SEA topics considered

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<sup>24</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*



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 Age and Status of the South West Regional Strategy

As noted in **Section 2.3**, RPG10 was given legal status as the region's RSS in 2004. A draft (replacement) RSS was submitted to the Secretary of State in March 2006 which underwent Examination in Public with the Secretary of State's proposed changes (the draft revised RSS) subject to consultation in July 2008. However, the final revision of the South West RSS was not completed before the change of administration in May 2010.

Some local authority plans in the South West have taken account of policies within the draft RSS as it emerged, particularly those adopted between July 2008 and July 2010 (the period between the publication of the Secretary of State's proposed changes and the Government's announcement of its proposal to revoke regional strategies when work on the draft RSS stopped). This has been reflected within this assessment where appropriate. Further details of the individual policies that comprised the draft revised RSS are set out in **Appendix I**.

### 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 South West 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 South West Regional Strategy

**Table 4.1** summarises the effects of revoking RPG10 against the 12 SEA topics. As noted in section 3.4.3, the Regional Economic Strategy commitments have been mapped onto RPG10 policies (**Appendix H**). This analysis has identified considerable overlap between RPG10 policies and those of the RES and in order to avoid duplication, the assessment summarised in **Table 4.1** has focussed on RPG10 policies.

The following key has been used in completing the assessment.

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</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 South West Regional Strategy (with reference to RPG10 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			
Policy VIS1	Expressing the Vision	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Policy VIS2	Principles for Future Development	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy SS 1	Regional Spatial Strategy	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy SS2	Regional Development Strategy	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
Policy SS3	The Sub-Regional Strategy	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy SS4	Green Belt	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
Policy SS5	Principal Urban Areas	Revocation	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
Policy SS6	Other Designated Centres for Growth	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
Policy SS7	Meeting Local Needs	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			
			0	0	0	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS8	The Bristol Area	Revocation	0	0	0	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS9	Bath	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS10	Weston-super-Mare	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS11	Swindon	Revocation	0	0	0	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS12	Gloucester & Cheltenham	Revocation	0	0	0	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy SS13	Bournemouth/ Poole	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS14	Taunton	Revocation	0	0	0	+	+	+	+	/	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS15	Exeter	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS16	Torbay	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS17	Plymouth	Revocation	0	0	0	+	+	+	+	/	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS18	Cornwall and the Isles of Scilly	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			
Policy SS19	Rural Areas	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0	0	0	0
Policy SS20	Rural Land (including Urban Fringe) Uses	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+
Policy SS21	Coastal Areas	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0	0	0	0
Policy EN1	Landscape and Biodiversity	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
Policy EN2:	Air Quality	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			
Policy EN3	The Historic Environment	Revocation	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+
Policy EN4	Quality in the Built Environment	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
Policy EN5	Health, Education, Safety and Other Social Infrastructure	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
Policy EC1	Economic Development	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC2:	Areas of Special Need	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
Policy EC3	Employment Sites	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC4	Major Strategic Sites	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC5	Communications Networks	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
Policy EC6	Town Centres and Retailing	Revocation	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	0
Policy TCS1	Tourism	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			
Policy TCS2	Culture, Leisure and Sport	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
Policy HO1	Levels of Housing Development 1996-2016	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Policy HO3	Affordable Housing	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy HO4:	Housing in Rural Areas and the Isles of Scilly	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Policy HO5	Previously Developed Land and Buildings	Revocation	0	/	/	0	/	/	+	/	/	0	/	/	0	/	/	0	/	/	+	/	/	+	/	/	0	/	/	0	/	/
			?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
Policy HO6	Mix of Housing Types and Densities	Revocation	0	0	0	+	+	+	+	?	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	?
Policy TRAN1:	Reducing the Need to Travel	Revocation	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN2	Strategic Inter-Urban and Inter-Regional Transport Networks	Revocation	?	?	?	+	+	+	?	?	?	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy TRAN3	The Urban Areas	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN4:	Transport Infrastructure Investment Priorities	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			
Policy TRAN5:	Demand Management	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN6	Movement of Goods	Revocation	?	?	?	+	+	+	?	?	?	0	0	0	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	?	?	?
Policy TRAN7	The Rural Areas	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN8:	Ports and Inland Waterways	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?
Policy TRAN9:	Airports	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			
Policy TRAN10:	Walking, Cycling and Public Transport	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy RE1	Water Resources and Water Quality	Revocation	?	?	?	+	+	+	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy RE2	Flood Risk	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy RE3	Minerals Planning	Revocation	?	?	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	+
Policy RE4	Use and Supply of Aggregates	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			
Policy RE5	Management and Transportation of Waste	Revocation	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
Policy RE6	Energy Generation and Use	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?

### 4.2.1 Likely Significant Effects

Revocation of the South West 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 of the 8 principal RPG10 policy areas is presented below. Where relevant, reference is also made to the Regional Economic Strategy (RES); however, given the linkages between the two documents, it is considered appropriate to present the findings of the assessment using the broader range of policy issues presented in RPG10. 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).

#### Achieving and Implementing a Regional Vision

Policies VIS1 and VIS2 set out the overarching vision of RPG10 and principles for future development<sup>25</sup>. Together, they seek to develop the region in a sustainable way including by: promoting sustainable patterns of development; minimising development of greenfield sites; reducing the need to travel; concentrating growth in the region's principal urban areas (PUAs); and conserving and enhancing the South West's environmental assets. The vision and principles are reflected in the RES, particularly the priority of 'creating sustainable places for people and business' which focuses on the need for investment in the region's main urban areas whilst recognising the important role of sustainable development in rural areas to the prosperity and well-being of the region.

The assessment has found that revocation would not detract from the achievement of this vision and would therefore lead to positive effects across all of the SEA topics, similar to those associated with the retention. The presumption in favour of sustainable development is at the heart of the NPPF and is to be seen as a golden thread running through both plan making and decision taking. The principle of sustainable development, which already permeates planning, will therefore continue following revocation due to the strong emphasis in the NPPF.

The sequential approach to development underpinning the principles that comprise Policy VIS2 seeks to prioritise the development of previously developed land in urban areas. Under revocation, the core planning principle set out in the NPPF (paragraph 17) to "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value" would apply. Whilst this could lead to a greater proportion of development being directed away from urban areas and brownfield sites, it is expected that the focus of the NPPF on the delivery of

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<sup>25</sup> Policies VIS3 and VIS4 describe the mechanism for implementation of the vision and monitoring arrangements. These policies have not been assessed as part of this report as they are of a procedural nature and are therefore considered unlikely to generate environmental effects independently of the other policies contained within the Regional Strategy. In addition, the proposed monitoring bodies include the Regional Planning Body, Government Office and SWRDA, organisations which have been abolished.

sustainable development and the core planning principles outlined at paragraph 17 would deliver similar outcomes to those associated with retention.

**The revocation of policies VIS1 and VIS2 and the priorities set out in the RES is likely to generate similar effects as those associated with retention.**

### The Spatial Strategy

Policies SS1 to SS21 form the spatial strategy that underpins RPG10. They set out the broad approach to the distribution of development across the South West (in accordance with the vision and principles for development as described above) and identify the priorities for each of the four sub-regions (namely Northern, South East, Central and Western). This is supported by a suite of sub-regional policies concerning development at the region's PUAs (the Bristol area, Bath, Weston-super-Mare, Gloucester, Cheltenham, Swindon, Bournemouth, Poole, Taunton, Exeter, Torbay and Plymouth), which are to be the focus for growth in the South West, alongside policies relating to the role of 'other designated centres' and smaller towns, rural and coastal areas and the Green Belt.

The RES also recognises the diversity of the region and many of the sub-regional objectives identified in RPG10 are also reflected in the RES including those related to the provision of employment sites and housing, urban renaissance, improvement of transport networks and the need to reduce intra-regional disparities and tackle deprivation including in relation to rural areas.

Broadly, the assessment has identified that revocation of the policies that comprise the spatial strategy and RES objectives and priorities would lead to positive effects across many of the SEA topics but with those positive effects being significant in relation to population / health, as under retention. This reflects the fact that, in the short term, there is not expected to be any significant change in the type and magnitude of effects associated with the retention of these policies (described in **Section 4.3**) as only 7 LPAs<sup>26</sup> do not currently have a local plan adopted shortly before or after the publication of RPG10 or an adopted core strategy. Whilst adopted core strategies may have also reflected the draft RSS as it emerged, and particularly plans adopted between July 2008 and July 2010 (the Poole Core Strategy is the only core strategy adopted during this period), the spatial strategy set out in Policy CSS of the draft revised RSS (see **Appendix I**) was in general alignment with that of RPG10 and the RES in seeking to focus growth within urban areas (particularly in the northern sub-region).

In the medium to longer term, it will be for local authorities to determine the strategic approach to development as plans prepared in accordance with the Regional Strategy are replaced. This could lead to greater uncertainty of effects. For example, a more dispersed pattern of development (i.e. less focus on the region's PUAs) could restrict the potential to increase accessibility to jobs and services, improve the urban environment and deliver housing (including affordable provision) in areas of greatest need. However, this may also provide greater scope for reducing certain types of intra-regional disparity that

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<sup>26</sup> This figures includes the former local authority areas that now comprise Cornwall Council and Wiltshire Council where relevant.



exist in the South West, for example generating improvements to human health (including by avoiding development in areas with existing air quality issues or by providing more opportunities for/accessibility to green space). Equally, intra-regional disparities may be increased should more affluent areas adopt higher growth targets which act to draw needed investment away from more deprived communities.

Notwithstanding the *potential* effects outlined above, the focus of the NPPF is on the delivery of sustainable development (as discussed above) whilst the core planning principles outlined at paragraph 17 of the document state, amongst other elements, that planning should:

- take account of the different roles and character of different areas, promoting the vitality of the main urban areas;
- allocate land for development that is of lesser environmental value and encourage the effective reuse of land that has been previously development; and
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

It is also anticipated that coordination of regional and sub-regional priorities will continue under the duty to co-operate as well as through partnerships operating at the regional and sub-regional scale (e.g. LEPs and the Joint Core Strategies) and in this context, paragraphs 178 to 181 of the NPPF set out that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities are coordinated. Further, for many authorities (and groups of authorities) the assessment has found that the overarching spatial strategy will be pursued in absence of the Regional Strategy due to the fact they have development plans that are compliant with the spatial strategy set out in RPG10.

It is noted that revocation of the Regional Strategy would not affect the proposal to retain Policy 6 of the Somerset and Exmoor Joint Structure Plan Review (1991-2011), which relates to the Bristol/Bath Green Belt. This will help to ensure that the extent of the Green Belt is maintained in this location until an up-to-date local plan is adopted by Mendip District Council.

In view of the requirements of the NPPF coupled with the expectation that strategic considerations with respect to the location of development at the regional and sub-regional scale will continue in accordance with the duty to co-operate, it is considered that revocation of those policies that comprise the spatial strategy would generate similar effects to those associated with retention. More detailed consideration of each sub-region and the policies covering their constituent PUAs is provided below.

### *Northern Sub-Region*

Policies SS8 to SS12 of RPG10 set out the objectives for the PUAs within the Northern sub-region (the Bristol area, Bath, Weston-super-Mare, Swindon and Gloucester and Cheltenham). Reflecting the priorities for the sub-region identified in policies SS1 and SS3, RPG10 seeks to build on the economic potential of the area with particular emphasis placed on the growth of Bristol as the sub-region's primary economic driver. Similarly, the RES highlights the West of England, and in particular Bristol, as having a

lead role as a city-region of international, national and regional significance. Swindon, Gloucester and Cheltenham are also highlighted as having the potential for a far more significant role in the region.

The assessment identified significant positive effects against the population and human health topic in respect of the revocation of policies covering the Bristol area, Bath, Weston-super-Mare and Swindon and positive effects in respect of the Gloucester and Cheltenham PUA associated with the future provision of housing and jobs and wider economic growth and restructuring supported by the West of England, Swindon and Wiltshire and Gloucestershire LEPs which may also help address inequalities that exist across the sub-region's urban areas. The assessment also found that there is potential for positive effects on biodiversity, cultural heritage, soil and landscape topics in respect of the revocation of Policy SS9 (Bath) and Policy SS10 (Weston-super-Mare) given the emphasis placed on the protection and enhancement of the environment within the NPPF and within existing local plan policy (such as the Bath and North Somerset Local Plan 2007) and emerging policy (the emerging Bath Core Strategy seeks to protect and enhance the City's environmental assets).

A policy framework post-revocation which promotes growth and development, will lead to adverse effects on material assets resulting from the use of building materials and water and due to increased demand for these resources. The assessment also identified potential for increased flood risk particularly in respect of those PUAs coastally located although the NPPF does contain a significant level of policy support for the location of development outside of areas susceptible to flooding through the retention of the sequential test.

A core principle of the NPPF is an encouragement to use brownfield land which may reduce the pressure on greenfield land for development and help to maintain soil quality. However, the emerging local plans for authorities covering Swindon and Gloucester and Cheltenham are likely to continue to include for urban extensions, in line with RPG10, whilst the adopted Bristol City Council Core Strategy includes Green Belt land at southeast Bristol which could act as a long term contingency for the future supply of homes. This may lead to negative effects on soil, and this may increase further in the medium to long term as the pressure on greenfield land increases, and the regional target for brownfield development is revoked.

Effects in respect of air and climatic factors are considered to be largely uncertain. Whilst focusing the majority of development within areas where the fullest possible use of sustainable transport modes can be realised is likely to reduce the need to travel by car (thereby helping to improve air quality and reduce greenhouse gas emissions) over a more dispersed pattern of development, it may also lead to increased traffic in specific localised areas. This could have a localised adverse effect on air quality especially as there are a number of designated AQMAs within the sub-region's main centres (Bristol in particular suffers from existing severe congestion which may be exacerbated).

In conclusion, it is considered that there is unlikely to be any significant differences in the effects identified above between retention and revocation. The objectives of adopted core strategies and emerging plans of those local authorities containing the PUAs that comprise the Northern sub-region are broadly consistent with RPG10 policies SS8 to SS12 and the RES. However, it is acknowledged that in

the medium to long term there is greater uncertainty in respect of emerging plans as policies potentially diverge from the spatial approach set out within RPG10, in response to local needs and priorities. However, this is unlikely to materially affect these high-level sustainability outcomes.

### *South-East Sub-Region*

Policies SS1 and SS3 identify that the priorities for the South-Eastern sub-region are to continue to exploit the economic growth potential of the area, spreading benefits across the sub-region whilst conserving and enhancing environmental assets. These priorities are reflected in Policy SS13 which sets out the objectives for the Bournemouth-Poole conurbation, the only PUA in this sub-region.

Support for the further growth and economic expansion of the Bournemouth-Poole conurbation will continue under revocation. The overarching objectives of both the adopted Poole Core Strategy and draft Bournemouth Core Strategy (which is due to be adopted in 2012) are broadly comparable to those of Policy SS13 particularly in seeking to focus growth within existing urban areas, encouraging knowledge-based/high tech economic development and promoting the protection of important national and international designations. Allied to this, it is anticipated that priorities for the conurbation as well as the wider sub-region would continue to be established at the regional and sub-regional level under the duty to co-operate. In this respect, there is already strong co-operation across a number strategic issues in this sub-region including, for example, economic development (via the Dorset LEP) and transport (Bournemouth, Poole and Dorset Councils have prepared a Local Transport Plan).

Revocation has therefore been assessed as having a significant positive effect on the population and human health SEA topic. This particularly reflects the potential for the emerging Core Strategy policies to encourage development that builds on the existing economic base of the conurbation supported by the objectives of the Dorset LEP which seeks to retain and improve skills in the sub-region (amongst other complementary initiatives). Positive effects have also been identified in respect of the biodiversity, soil and landscape topics particularly given the strong emphasis placed on the conservation and enhancement of national and international designations within the NPPF which would be applicable to areas such as the Dorset Heaths Ramsar, SPA and SAC, Poole Harbour Ramsar and SPA and New Forest Ramsar, SPA and SAC sites although it is recognised that the potential for nearby development may place additional pressure on these important assets. It is anticipated that these pressures will be managed through the Dorset Heathlands Joint Development Plan Document which is being produced by Bournemouth, Christchurch, East Dorset, Poole and Purbeck local planning authorities.

Negative effects are identified in respect of material assets, resulting from the use of building materials. Whilst the extant and emerging local plan and core strategy policies place emphasis on the protection of environmental assets and may (allied with the NPPF) generate positive effects in respect of water, the potential for increased levels of development is likely to lead to a rise in demand for water resources. Overall, effects on the water topic are therefore also likely to be negative for revocation.

Effects in respect of air and climatic factors are considered to be largely uncertain. Whilst existing and emerging local policies will continue to focus development within urban areas thereby reducing the need to travel by car (helping to improve air quality and reduce greenhouse gas emissions), localised areas

which become the subject of such development may experience an increase in traffic which could have an adverse effect on air quality and energy use. Consequently, no difference in effects has been identified between the retention and revocation of Policy SS13.

### *Central Sub-Region*

Policies SS14-SS16 set out the objectives for the three PUAs located within the Central sub-region (Taunton, Exeter and Torbay). In accordance with the priorities for the wider sub-region (set out in policies SS1 and SS3), development in these areas is expected to support economic diversification, address pockets of deprivation and affordability issues and spread economic development westwards.

Revocation will leave decisions to local authorities, collaborating under the duty to co-operate, to bring forward the necessary development across the sub-region in line with the policies in the NPPF. In the short term, effects are expected to be similar to those associated with retention as the Taunton Deane Borough Core Strategy, Torbay Local Plan and Exeter Core Strategy have been adopted within the regional framework provided by RPG10.

Whilst the Torbay Core Strategy is not well advanced, a number of emerging objectives set out in the Torbay Core Strategy Regulation 25 consultation document (dated 2009) reflect those of Policy SS16 including to broaden the economic base of Torbay and increase investment in tourism infrastructure. Economic support is also provided by the Heart of the South West LEP. Economic development is particularly important because Torbay suffers from a relatively weak economy, generating the least GVA per head in the South West. The area also suffers from severe deprivation with 1 in 10 people living within the 10% most deprived areas nationally.

National policy and fiscal support which is intended to promote growth and development across the sub-region will, as with all policy, create adverse effects on material assets resulting from the use of building materials, and water, due to increased demand for resources. However, NPPF policy also seeks to minimise the use of materials and it promotes the use of secondary aggregates. Similarly, PPS10 seeks to reduce the amount of waste generated, promote re-use and recycling.

Increasing employment and housing provision with a focus upon the main urban centres should reduce the need to travel which in-turn is expected to generate positive benefits with respect to human health, air and climatic factors although growth and development could exacerbate existing traffic problems where they exist (Exeter, for example, suffers from existing significant congestion on routes into the city at peak hours with most of the major road network designated as an AQMA) and will lead to increased energy use. Effects are therefore considered to be uncertain in relation to air and climatic factors topics.

### *Western Sub-Region*

Policies SS1 and SS3 identify that the priority for the Western sub-region is to address economic decline and conserve and enhance important built and natural environmental assets. These priorities are reflected in Policy SS17, which sets out the objectives for Plymouth (the only PUA in this sub-region), as well as Policy SS18, which defines the priorities for Cornwall and the Isles of Scilly.

The Plymouth City Core Strategy was adopted in April 2007. In accordance with the Regional Strategy and RPG10 Policy SS17 in particular, it seeks to establish Plymouth as the economic hub of the far South West. Focusing sub-regional growth in Plymouth will help the city realise its economic potential and address the disparities that exist in the area (around 1 in 10 people live within the 10% most deprived areas nationally). In this context, the RES identifies Plymouth as having the potential for a far more significant role in the region's economy and as an area where focused effort is needed to address pockets of deprivation. The growth of Plymouth may also help distribute these benefits beyond the immediate area to the wider Western sub-region and beyond.

Despite the status of local plans in the Cornwall area (the majority of which were adopted at or prior to the publication of RPG10), it is anticipated that coordination of development in the area will continue under the duty to co-operate and will be facilitated by existing partnerships operating within the area including the Cornwall and Isles of Scilly LEP. Further, the emerging Core Strategy for Cornwall (consultation on the preferred approach for the Core Strategy took place between January and March 2012) continues the focus on the regeneration of Camborne and Redruth (including Pool) in RPG10 and supports improvements to the other main towns. Together with the priorities of the LEP, this will help to address the area's weak economy (together with Torbay, Cornwall/the Isles of Scilly generate the least GVA per head in the South West), diversify employment (which is generally low waged and seasonal) and tackle the widespread deprivation that exists in the area (complementing European Convergence Funding investment). Growth will also help address issues related to affordability in the housing market. Whilst it is noted that the emerging plan places greater emphasis on the St Austell and Clay Country area as a focus for regeneration, it seems likely that the associated effects will be similar to those identified in relation to retention.

In addition to significant population benefits, potentially positive effects have been identified against the biodiversity, cultural heritage and landscape topics in respect of the revocation of Policy SS18 particularly given the continued emphasis within the NPPF on the conservation and enhancement of the natural and historic environment. However, the growth of Plymouth, which is likely to include extensions to the urban area, may also lead to increased pressure on natural environmental assets including, for example, the Plymouth Sound and Estuaries European Marine Site, Dartmoor National Park and the Tamar Valley and South Devon AONB and therefore neutral effects have been identified against these topics in respect of Policy SS17.

Whilst the protection of environmental assets set out within the NPPF may generate positive effects in respect of water, development will increase demand on water resources. On balance, negative effects have therefore been identified in respect of this topic. Negative effects were also identified in respect of material assets, resulting from the use of building materials.

A continued focus on development within existing urban areas as set out within extant and emerging local policy, and support by national policy is expected to reduce the need to travel and encourage walking and cycling, helping to promote healthier lifestyles whilst also improving air quality and reducing greenhouse gas emissions. However, there is potential for adverse effects where development is

proposed in areas with existing air quality issues and growth more generally will lead to increased energy use. Effects are therefore considered to be uncertain in relation to air and climatic factors.

**Overall, the assessment has not identified any areas where revocation of those policies which make up the high level Spatial Strategy or RES objectives and priorities would have any significant negative effects.**

### The Natural and Built Environment

Policies EN1 – EN7 set out the regional approach to protection and enhancement of the natural and built environment covering landscape and biodiversity, air quality, the historic environment, urban environments and the provision of community facilities and services. The environmental policies in RPG10 are also reflected within the RES (Regional Priority 3B) which seeks to maintain and enhance the region's environmental assets and to use them to raise the profile and image of the South West.

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 and achieving quality in the built environment through good design. The NPPF also sets out that planning should take account of, and support local strategies to improve, health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

The assessment has shown that under revocation, with the continuance of legal responsibilities (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), positive effects will be generated across all of the SEA topic areas with many of the effects being significant. It is also assumed that local authorities will work together under the duty to co-operate and through mechanisms such as the Local Nature Partnerships to optimise the benefits to biodiversity. For example, a Dorset Heathlands Joint Development Plan Document is being produced by Bournemouth, Christchurch, East Dorset, Poole and Purbeck local planning authorities.

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 revocation.

**The assessment has not identified any areas where revocation of policies EN1-EN7 or RES objectives and priorities have any significant negative effects.**

## The Economy

Policies EC1-EC6 deal with economic development, seeking to improve the prosperity of the South West through promoting new economic activity, accommodating new economic development in sustainable locations, regenerating areas of special need and raising skills. The RES sets out strategic objectives, priorities and associated delivery activities which seek sustainable growth of the region's economy. The RES is consistent with RPG10 and policies EC1-EC6 are reflected in the RES. Of particular relevance to policies EC1-EC6 are the RES priorities: 'support business productivity'; 'regenerate the most disadvantaged areas'; and plan for sustainable and successful for communities'.

Policies within RPG10 and the RES do not specify a specific quantum of employment land or number of jobs to be provided at the sub-regional or local authority level. Notwithstanding, the analysis of adopted local plans (see **Appendix C**) indicates that where employment land and/or job targets are provided at the local level these are now outdated. Whilst sub-regional job growth and employment land targets were set out in the draft revised RSS (see **Appendix I**), these were by Housing Market Area and Travel to Work Area only and not apportioned to individual local authority areas. It is therefore not possible to determine whether these targets have been fully reflected in core strategies adopted since the publication of the draft revised RSS (see **Appendix C**). Consequently, there is a degree of uncertainty with respect to the magnitude of effects which will be dependent on the quantum and precise location of future economic development. Notwithstanding, 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 this context, at paragraph 20 the NPPF states that 'local authorities should plan proactively to meet development needs of business and support an economy fit for the 21st century'. Paragraph 158 of the NPPF also seeks to ensure that Local Plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. In consequence, with revocation 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 co-operate where cross boundary approaches are required.

The assessment has identified that with the continuation of the approach indicated above, the positive effects on population through improved job opportunities and other socio economic benefits including improved health would continue to be experienced beyond the short term as plans are prepared in the absence of the Regional Strategy. Whilst RPG10 and the RES make reference to specific areas and settlements of special socio-economic need, the restructuring and regeneration priorities for these places would be picked up and made more specific in their respective local plans. In this regard paragraph 21 of the NPPF states that in drawing up their plans, local planning authorities should identify priority areas for economic regeneration. It is also expected that local authorities will continue to adopt coordinated approaches to economic development at the regional/sub-regional scale under the duty to co-operate as

well as through LEPs (the whole of the South West has LEP coverage) and other economic partnerships/initiatives including, for example, Enterprise Zones (two Enterprise Zones are located in the South West, namely Bristol Temple Meads and Newquay Aerohub).

The extraction and use of raw materials required to bring forward employment sites and associated waste generation (during construction and operation) is likely to have a significant negative effect on material assets. Development is also likely to increase per capita water consumption generating a negative effect in respect of water resources.

Whilst the NPPF promotes sustainable patterns of development and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion, development is likely to lead to an increase in commuting and use of cars, generating increases in emissions to air from road transport. Development will also increase greenhouse gas emissions associated with construction activity, commuting and operational energy use. This has been assessed as having a negative effect in respect of air quality and climatic factors.

Economic development may affect biodiversity, landscape and soil due to the impacts of new building including construction on previously undeveloped land. Development could also potentially have negative effects on historic town centres such as Bath. However, the type and magnitude of effects will largely depend on the quantum and precise location of future employment areas and specific development sites that will be identified and brought forward through local plans. Further, negative effects can be mitigated to a degree through 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). Consequently, effects on these topics have been assessed as being largely uncertain.

**The revocation of policies EC1 to EC6 and the vision, strategic objectives and priorities of the RES is unlikely to affect the need for local authorities to continue to provide growth within the region. Providing for development and employment opportunities are expected to have significant benefits for the population. Any adverse effects arising from development will be subject to the mitigation measures set out in the NPPF and the provisions of an authority's own local plan.**

### Tourism, Culture, Leisure and Sport

Policies TCS1 and TCS2 form the regional policy for tourism, culture, leisure and sport. Policy TCS1 promotes sustainable tourism including improving the quality and range of attractions and accommodation in the region and promoting and enhancing special cultural, heritage and countryside features of the South West. Policy TCS2 meanwhile requires local authorities and other bodies to protect, and identify opportunities for new cultural, leisure and community sports facilities.

The NPPF strongly supports sustainable economic growth across all sectors, which would include the tourism sector (paragraph 18-21) and it also contains specific policies on tourism, linked to the vitality of



town centres (paragraph 23), and supporting a prosperous rural economy (paragraph 28). 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 population and human health as well as cultural heritage. However, it is recognised that increasing visitor numbers and the development of new tourism attractions can lead to negative environmental effects particularly in respect of biodiversity, water, air, climatic factors and soil.

**The assessment has shown that under revocation and with the application of the NPPF, there would be significant positive effects on population/human health as well as cultural heritage. The assessment has not identified any areas where revocation of policies TCS1 and TCS2 would have significant negative effects.**

## Housing

Policies HO1-HO6 set out the regional approach to housing<sup>27</sup>. Together they seek to: increase the level of new housing to meet demand including for affordable housing; encourage the use of previously developed land and buildings, bringing empty homes back into use; provide a better mix of the size, type, tenure and location of quality, well designed housing in all areas; and create more sustainable patterns of development. These policies are reflected within the RES which, under the priority of 'plan sustainable and successful communities', identifies a need to provide good quality, affordable homes.

Revocation of the Regional Strategy will not remove the need for more houses within the region. 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 South West region.

In the short to medium term, revocation is not expected to impact on house building rates in the region reflecting the fact that these remain below requirements set out in RPG10 Policy HO1 (due mainly to macro-economic circumstances). In the longer term, it is expected that the annual average rate of house building will increase as housing will be delivered at the higher rates set out in adopted core strategies and emerging plans based on up-to-date evidence of housing need. In this context, provision is made for a total of 22,586 dwellings per annum within the adopted core strategies and emerging plans of all

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<sup>27</sup> Policy HO2 sets out proposals for monitoring and managing housing provision and has not been assessed as part of this report as it is of a procedural nature and therefore considered unlikely to generate environmental effects.

local authorities across the South West<sup>28</sup>. This exceeds the annual requirements set out in Policy HO1 and consequently it is assumed that significant positive effects on the population topic associated with increased housing provision would continue (although effects are likely to be less in the short term due to lower completion rates). However, it should be noted that planned housing growth is below the housing requirements set out in Policy HD1 of the draft revised RSS for these authorities (28,349 dwellings per annum) with a total of 14 adopted and emerging core strategies either meeting or exceeding these targets.

The extraction and use of raw materials to support housing development and associated waste generation (construction and municipal waste arisings) is likely to have a significant negative effect on material assets. Development is also likely to increase per capita water consumption generating a negative effect in respect of water resources. Meeting the future housing needs of the region as the 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 it does not set a target for housing on brownfield land (unlike Policy HO5 of RPG10 which sets a target of 50%) and there will still need to be significant greenfield developments. The assessment has indicated that this would be likely to have negative effects on a number of SEA topics (biodiversity, soils, cultural heritage and landscape) although there will be uncertainties as the exact scale and location of development is unknown. Negative effects can also be mitigated to a degree through other policies in the NPPF which seek to minimise environmental effects. Again, it is anticipated that negative effects would be lessened in the short to medium term as a result of slower growth.

Whilst the NPPF promotes sustainable patterns of development and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion, development is likely to lead to an increase in commuting and use of cars, generating increases in emissions to air from road transport. Development will also increase greenhouse gas emissions associated with construction activity, commuting and operational energy use. This has been assessed as having a negative effect in respect of air quality and climatic factors.

RPG10 does not include specific policy covering provision for gypsies and travellers and travelling showpeople. However, Policy GT1 of the draft revised RSS set out a requirement for local authorities to provide for 1,634 additional pitches in the region to 2011 with a 3% compound growth in requirements per annum thereafter (where updated data on Gypsy and Traveller requirements is not available) whilst Policy GT2 identified a requirement for 94 additional plots for travelling showpeople in the region. Of the 47 local authorities in the South West (including the former local authority areas that now comprise Cornwall Council and Wiltshire Council), 15 have local plans or core strategies which do not make any provision for gypsies and travellers. Four adopted core strategies include specific targets which reflect those contained within the draft revised RSS and/or are based on local assessments of need. As RPG10 does not include policy relating to gypsies and travellers and travelling showpeople, revocation is

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<sup>28</sup> Note that this figure does not take account of the emerging plans of Exmoor National Park, Council of the Isles of Scilly, Cotswold and West Dorset District Councils and Weymouth and Portland Borough Councils which are at an early stage in plan preparation.

not expected to affect provision. The new national policy for gypsies, travellers and travelling showpeople should provide the required provision for these groups. It asks local authorities to use a “robust evidence base” to assess needs for the purposes of planning and managing development of traveller sites, and to set targets for traveller sites based on their needs assessment. The policy asks local authorities to bring forward a five-year supply of land for traveller sites in their plans to meet the targets they have set and to update it annually. The policy also asks local authorities to look into the longer term and to identify a supply of specific developable sites or broad locations for years six to ten and, where possible, for years 11-15. As with housing more generally, under revocation there will be significant positive effects on population as additional provision for gypsy and travellers is secured through the adopted and emerging core strategies and local plans. Further, revocation offers the prospect of providing clarity to local authorities in the region by removing the potentially confusing position created by the absence of gypsy/ traveller site policy in RPG10 combined with a targeted requirement within the draft revised RSS.

**The revocation of policies HO1 to HO6 is unlikely to affect the need for local authorities to continue to provide for growth within the region. Providing housing development (including gypsy and traveller sites) is expected to have significant positive benefits to the population and significant negative effects in respect of material assets. Any adverse effects arising from development will be subject to the mitigation measures set out in the NPPF and the provisions of an authority’s own local plan.**

## Transport

Policies TRAN1 – TRAN10 form the Regional Transport Strategy. These policies support the broader spatial strategy of RPG10 and seek to reduce the need travel, improve accessibility and create a modern, efficient and integrated transport system. The Regional Transport Strategy is reflected under the RES priority of ‘improve transport networks’ which seeks increased reliability of public transport infrastructure and enhanced connectivity, providing access to markets, reducing travel time and tackling peripherality.

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 and they are continuing with the preparation of their Round 3 Local Transport Plans (for example, the published Plymouth Local Transport Plan 2011-2026). In addition, the management of 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.

With respect to investment in telecommunications, which is specifically supported by RPG10 Policy TRAN 7, the NPPF states that ‘local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband’ (paragraph 43). Also there is a national project being delivered by Broadband Delivery UK (BDUK) unit within the

Department for Culture, Media and Sport (DCMS). The Government has committed to deliver the best superfast broadband network in Europe by 2015. The ambition is to provide superfast broadband to 90% of premises in the UK and to provide universal access to standard broadband with a speed of at least 2Mbps. ICT is also an important consideration for the six LEPs operating in the region in achieving economic growth.

**The assessment has shown that revocation will lead to positive/significant positive effects for population, health, air and climatic factors.** This reflects the emphasis within the NPPF on encouraging a modal shift towards more sustainable transport modes and increased walking and cycling which has the potential to improve air quality, reduce greenhouse gas emissions, promote healthier lifestyles and improve accessibility including for rural communities. Continued investment in strategic transport infrastructure of the type set out within Policy TRAN4 as well as the region's ports and airports and telecommunications is also likely to generate significant regional economic benefits by, for example, supporting existing businesses and encouraging inward investment, addressing issues related to the peripherality of some of the areas within the region itself (most notably the Western sub-region) and generating direct and indirect employment benefits (e.g. benefits associated with capital spend). This 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 co-operate provides the mechanism for this to happen. In this context, 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.

The construction and operation of new transport infrastructure may lead to increased emissions to air and greenhouse gases arising from growth in vehicle movements and construction activity generating minor negative effects in respect of air and climatic factors. Development is also likely to use material assets (e.g. construction materials) and generate construction waste and whilst there may be potential to reuse aggregates, revocation has been assessed as having a negative effect in relation material assets.

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

Other effects through revocation will be largely neutral or uncertain due to the uncertainty over the nature and location of particular elements of transport infrastructure investment. Many of the effects will also depend on the ability to change travel behaviour and the demand for transport.

## Infrastructure and Natural Resources

Policies RE1-RE6 concern water, minerals, waste and energy generation and use and are reflected in the RES which promotes the efficient use of resources. Given the diversity of themes within this section of RPG10, the assessment of the respective policies under each is summarised in-turn below.

### *Water*

Policies RE1 and RE2 deal with water issues requiring local authorities, the Environment Agency, water companies and other bodies to: plan water infrastructure in accordance with the regional spatial strategy; conserve water through demand management; protect groundwater resources; protect and enhance river and coastal water quality; and protect the development of land liable to river and coastal flooding.

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. Water Company Water Resource Management Plans provide 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 and technical guidance on flood risk published alongside the Framework. 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. In preparing their plans local planning authorities should also draw upon their Strategic Flood Risk Assessments, and the Catchment Flood Management Plans and policies in Shoreline Management Plans and Flood Management Strategies produced by the Environment Agency.

**Overall, the assessment has identified that revocation of policies RE1 and RE2 is likely to result in similar positive and significant positive effect as those associated with retention.**

### *Minerals*

Policies RE3 and RE4 set out the regional policy framework for minerals. Together they seek to safeguard mineral resources, reduce the overall extraction of primary aggregates and protect against adverse environmental impacts arising from extraction (including in relation to the transportation of minerals) whilst promoting environmentally beneficial reclamation.

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 found that the positive benefits identified in respect of retention are maintained under population / health topics as well as biodiversity and landscape (in the longer term). However, revocation is likely to result in the same adverse effects on water, soil, material assets, air and climate change as each minerals authority will still need to plan for aggregate extraction.** In this regard, an examination of the 8 minerals plans in the region indicate that the apportionment figures in RPG10 have been carried forward or used as a basis for calculation in the preparation of 6 of the local plans, whilst the other plans (North Somerset and Wiltshire) are based on more recent guideline figures issued by the Government.

### *Waste*

Policy RE5 deals specifically with the management and transportation of waste, seeking to drive the management of waste up the waste hierarchy and locate waste management facilities at or near the region's PUAs in order to reduce transport movements.

Revocation will have no overall effect. Waste planning authorities will still be required to comply with national policy in Planning Policy Statement 10 and the general policy approach to the location of development as set out in NPPF, as well as their legal obligations under the Waste (England and Wales) Regulations 2011 and the National Waste Management Plan for England as it emerges. Whilst Policy RE5 contains 'regional' targets, these are not apportioned at the sub-regional scale and in any case (being based on the Waste Strategy 2000) they have been subsequently revised. The Government's Waste Policy Statement for example references the revised Waste Framework Directive Target of 50% recycling of municipal waste by 2020.

The draft revised RSS did include sub-regional municipal and commercial and industrial waste capacity targets (see **Appendix C**). In this respect, an analysis of waste plans within the region has identified that half (Devon, Bournemouth/Dorset/Poole, Somerset and Gloucestershire) seek to comply with the objectives set out RPG10, whilst the remaining plans (Plymouth, Wiltshire and the Bath and North Somerset Joint waste core strategy) draw upon the Waste Strategy 2007 and more up-to-date objectives. A policy landscape which included RPG10 waste capacity and recycling targets, draft

revised RSS targets and national targets does raise the prospect of confusion and the revocation of the Regional Strategy therefore offers the prospect of clarity for the waste planning authorities in the region.

Irrespective of the targets to be attained the authorities will still be required to plan for the waste management needs in their area, driving waste management up the hierarchy, helping to implement the international and national waste legislation and take more responsibility for their own waste.

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

### *Energy Generation and Use*

Policy RE6 stipulates that local authorities, energy suppliers and other bodies should reduce greenhouse gas emissions, increasing renewable energy production and promoting energy conservation measures (e.g. through design, layout and construction techniques).

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.

National Planning Statement EN-3 Renewable Energy Infrastructure is also likely to be a material consideration in decision making on relevant applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis.

RPG10 does refer to national targets for reductions in greenhouse gas emissions (to 2012 only) and also sets out a target for a minimum of 11-15% of electricity production to be from renewable energy sources by 2010 although this is not apportioned between local authorities and in any case the targets are outdated. It should also be noted that the draft revised RSS included county level onshore renewable electricity capacity targets to 2010 alongside region-wide targets to 2020 which equated to approximately 20% of regional electricity demand to be generated from renewable sources (see **Appendix I**). 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)) including approximately 30% of electricity demand. The UK National Renewable Action Plan 2010 sets out the UK's path to meet it.

**Taking into account national targets for greenhouse gas emissions reduction and renewable energy and the provisions of the NPPF and National Planning Statement EN-3, the assessment has shown that revocation would have a significant positive effect on climate change.** Effects on other topics are likely to continue to be uncertain and dependent on the scale/type of renewable energy schemes developed and their location such that localised negative effects upon landscape and biodiversity could be potentially experienced as a result of renewable energy development. The impacts

arising from these effects will need to be balanced against the wider environmental benefits that accrue as a result of the transition to low carbon energy generation and its contribution to the mitigation of climate change.

#### 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**. For example, concerning material assets, significant negative effects associated with new housing development may be mitigated to a degree through other policies in the NPPF including those which seek good design and the sustainable use of materials. PPS10 also seeks to drive waste management up the hierarchy which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, replacing primary aggregate.

### 4.3 Effects of Retention of the South West Regional Strategy

Retention of RPG10 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 retention on the 8 principal RPG10 policy areas is presented in **Table 4.2** and commented on below. **Table 4.2** summarises the effects of retaining RPG10 against the 12 SEA topics. As noted in **Section 4.2**, the Regional Economic Strategy commitments have been mapped onto the RPG10 policies (**Appendix H**). Due to the overlap between them, and in order to avoid duplication, the assessment summarised in **Table 4.2** has focussed on RPG10 policies. Please note that within this alternative, retention is defined as the retention of all the policies within RPG10 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 effect positive	<b>0</b> No overall effect	<b>-</b> Minor negative effect	<b>--</b> Significant negative effect	<b>?</b> Score uncertain
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*NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is*



*insufficient evidence for expert judgement to conclude an effect.*

*The reasons for the assessment are presented in Appendix D for each policy.*

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

**Table 4.2 Summary of the Effects of Retention of the South West Regional Strategy (with reference to RPG10 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			
Policy VIS1	Expressing the Vision	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Policy VIS2	Principles for Future Development	Retention	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS 1	Regional Spatial Strategy	Retention	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS2	Regional Development Strategy	Retention	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy SS3	The Sub-Regional Strategy	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			
Policy SS4	Green Belt	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+			
Policy SS5	Principal Urban Areas	Retention	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy SS6	Other Designated Centres for Growth	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?			
Policy SS7	Meeting Local Needs	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?			
Policy SS8	The Bristol Area	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
Policy SS9	Bath	Retention	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS10	Weston-super-Mare	Retention	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS11	Swindon	Retention	0	0	0	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS12	Gloucester & Cheltenham	Retention	0	0	0	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS13	Bournemouth/ Poole	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			
Policy SS14	Taunton	Retention	0	0	0	+	+	+	+	+	+	/	+	-	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS15	Exeter	Retention	0	0	0	+	+	+	0	0	0	0	0	-	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS16	Torbay	Retention	0	0	0	+	+	+	0	0	0	0	0	-	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS17	Plymouth	Retention	0	0	0	+	+	+	+	+	+	/	+	-	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS18	Cornwall and the Isles of Scilly	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			
Policy SS19	Rural Areas	Retention	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0	0	0	0
Policy SS20	Rural Land (including Urban Fringe) Uses	Retention	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+
Policy SS21	Coastal Areas	Retention	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0	0	0	0
Policy EN1	Landscape and Biodiversity	Retention	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
Policy EN2:	Air Quality	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
Policy EN3	The Historic Environment	Retention	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+
Policy EN4	Quality in the Built Environment	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+
Policy EN5	Health, Education, Safety and Other Social Infrastructure	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
RS Policy	Policy EC1: Economic Development	Retention	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC2:	Areas of Special Need	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
Policy EC3	Employment Sites	Retention	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC4	Major Strategic Sites	Retention	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?
Policy EC5	Communications Networks	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
Policy EC6	Town Centres and Retailing	Retention	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	0
Policy TCS1	Tourism	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			
Policy TCS2	Culture, Leisure and Sport	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
Policy HO1	Levels of Housing Development 1996-2016	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Policy HO3	Affordable Housing	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy HO4:	Housing in Rural Areas and the Isles of Scilly	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Policy HO5	Previously Developed Land and Buildings	Retention	0	0	0	0	0	0	+	+	+	0	0	0	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0	0	0	0
Policy HO6	Mix of Housing Types and Densities	Retention	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
Policy TRAN1:	Reducing the Need to Travel	Retention	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN2	Strategic Inter-Urban and Inter-Regional Transport Networks	Retention	?	?	?	+	+	+	?	?	?	0	0	0	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?	?	?	?
Policy TRAN3	The Urban Areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN4:	Transport Infrastructure Investment Priorities	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy TRAN5:	Demand Management	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
Policy TRAN6	Movement of Goods	Retention	?	?	?	+	+	+	?	?	?	0	0	0	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?			
Policy TRAN7	The Rural Areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN8:	Ports and Inland Waterways	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?			
Policy TRAN9:	Airports	Retention	?	?	?	+	+	+	?	?	?	0	0	0	-	-	-	-	-	-	?	?	?	?	?	?	?	?	?			
Policy TRAN10:	Walking, Cycling and Public 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 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			
Policy RE1	Water Resources and Water Quality	Retention	?	?	?	+	+	+	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy RE2	Flood Risk	Retention	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy RE3	Minerals Planning	Retention	?	?	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	+			
Policy RE4	Use and Supply of Aggregates	Retention	?	?	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	+			
Policy RE5	Management and Transportation of Waste	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			
Policy RE6	Energy Generation and Use	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?

### 4.3.1 Likely Significant Effects

#### Achieving and Implementing a Regional Vision

Reflecting their high level nature, the effects of retaining RPG10 policies VIS1 and VIS2 will be the same as under revocation with positive effects across all of the SEA topics although the degree of uncertainty identified under revocation with respect to the prioritisation of previously developed land in urban areas (see **Section 4.2**) may be reduced primarily because the relevant RPG10 policy contained a target for 50% of dwellings to be located on brownfield sites. The assessment has not identified any areas where retention of policies VIS1 and VIS2 would have significant negative effects although as with revocation, there is the potential for negative effects on water and material resources associated with new development.

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

#### The Spatial Strategy

The retention of policies SS1 to SS21, which together form the spatial strategy that underpins RPG10, and the RES objectives and priorities is broadly expected to generate the same positive effects as with revocation with significant positive effects identified particularly in relation to population/human health.

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

#### The Natural and Built Environment

The assessment has shown that in retaining the Regional Strategy, supported by the NPPF (and on-going joint working across the region), there will be benefits across virtually all of the SEA topic areas with many of the effects being significant. This reflects the positive nature of many of the policies within RPG10 and the RES priorities which seek environmental protection and enhancement. 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.**

#### The Economy

The assessment has identified significant positive effects against the population topic across the majority of RPG10 policies that concern the region's economy and RES strategic objectives and priorities, reflecting the potential for improved job opportunities and other socio economic benefits including improved health.

As with revocation, the extraction and use of raw materials required to bring forward employment sites and associated waste generation (during construction and operation) is likely to have a significant negative effect on material assets. Development is also likely to increase per capita water consumption generating a negative effect in respect of water resources.

Whilst criteria set out in Policy EC3 requires sites to be within urban areas, accessible to sources of labour and business services and provide a choice of transport access (including public transport where possible), development is likely to lead to an increase in commuting and use of cars, generating increases in emissions to air from road transport. Development will also increase greenhouse gas emissions associated with construction activity, commuting and operational energy use. This has been assessed as having a negative effect in respect of air quality and climatic factors.

Economic development may affect biodiversity, landscape and soil due to the impacts of new building including construction on previously undeveloped land. Development could also potentially have negative effects on historic town centres such as Bath. However, the type and magnitude of effects will largely depend on the quantum and precise location of future employment areas and specific development sites that will be identified and brought forward through local plans. Consequently, effects on these topics have been assessed as being largely uncertain. Potentially negative effects arising from this policy may be mitigated through both policies within the NPPF and RPG10. In this respect, it is noted that the criteria set out in Policy EC3 of RPG10 regarding employment sites states that development should be concentrated in urban areas with preference to the use of previously developed land which is expected to help maintain soil structure/quality and reduce pressure on the region's biodiversity, cultural heritage and landscape assets (by restricting development on greenfield sites).

**No significant differences have been identified between revocation and retention. Adverse effects are expected subject to the mitigation measures set out in the NPPF and RPG10 policies.**

Policies within RPG10 and the RES do not specify a specific quantum of employment land or number of jobs to be provided at the sub-regional or local authority level. As identified in respect of the revocation of the Regional Strategy, the analysis of adopted local plans (see **Appendix C**) indicates that where employment land and/or job targets are provided at the local level these are now outdated. Consequently, there is a degree of uncertainty with respect to the magnitude of effects which will be dependent on the quantum and precise location of future economic development.

### Tourism, Culture, Leisure and Sport

The assessment has identified that there will be significant positive effects on population/human health as well as cultural heritage related to the emphasis placed by policies TCS1 and TCS2 on the promotion of sustainable tourism (including improving the quality and range of attractions and accommodation and promoting and enhancing special cultural, heritage and countryside features) and the protection of existing, and identification of new, opportunities for cultural, leisure and community

sports facilities. However, as with revocation, it is recognised that increasing visitor numbers and the development of new tourism attractions can lead to negative environmental effects particularly in respect of biodiversity, water, air, climatic factors and soil although other policies contained within RPG10 and the NPPF will help to mitigate these.

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

## Housing

The assessment has identified that there will significant positive effects on population (as more people are housed) with ensuing socio-economic benefits. However, annual house building since 2001 has remained below the regional target set out in RPG10, with just over 16,000 dwellings being built in 2011/12. The combination of the on-going economic climate and current house building rates will probably mean that, despite retention, the amount of development delivered in the short to medium term is likely to continue to be lower than the annual target proposed in RPG10. The result is that, for the short to medium term at least, the beneficial effects (on population) will be lessened. As with revocation, in the longer term it is expected that the annual average rate of house building will increase beyond the requirements of RPG10 reflecting the assumption that housing will be delivered at the higher rates set out in adopted core strategies and emerging local plans (prepared in accordance with the NPPF) and taking into account wider Government policy to boost significantly the supply of housing (although it should be noted that planned housing growth is currently below the housing requirements set out in the draft revised RSS). Indeed, whilst Policy HO1 sets out requirements to 2016, these rates were intended to predominantly apply to 2006 with the intention being to prepare revised regional planning guidance on housing (informed by evidence relating to, for example, the capacity of the region's PUAs). In this respect, retention of this policy could create confusion in planning for housing delivery at the sub-regional level.

As noted under revocation (see **Section 4.2**), RPG10 does not include specific policy covering provision for gypsies and travellers and travelling showpeople although the draft revised RSS set out a requirement for pitch/site provision at the local authority level. Retention could therefore cause confusion in planning for future provision as a result of the absence of gypsy/ traveller site policy in RPG10 combined with a targeted requirement within the draft revised RSS and the new national policy for gypsies, travellers and travelling showpeople which stipulates that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople.

As under revocation, the extraction and use of raw materials to support housing development and associated waste generation (construction and municipal waste arisings) is likely to have a significant negative effect on material assets. Development is also likely to increase per capita water consumption generating a negative effect in respect of water resources.

Meeting the future housing needs of the region as the population grows will involve substantial new areas of development and whilst policies HO5 (which includes a 50% brownfield target) and HO6 of RPG10 and the NPPF seek to make effective use of land by re-using that which has been previously



developed and encourage high quality design, there will still need to be significant greenfield development. The assessment has indicated that this would be likely to have negative effects on a number of SEA topics (biodiversity, soils, cultural heritage and landscape) although there will be uncertainties as the scale and location of development is unknown. Negative effects can also be mitigated to a degree through other policies within RPG10 and the NPPF which seek to minimise environmental effects. Again, it is anticipated that negative effects would be lessened in the short to medium term as a result of slower growth.

Whilst the spatial strategy of RPG10 promotes development in locations that are likely to reduce the need to travel, development is likely to lead to an increase in commuting and use of cars, generating increases in emissions to air from road transport. Development will also increase greenhouse gas emissions associated with construction activity, commuting and operational energy use. This has been assessed as having a negative effect in respect of air quality and climatic factors.

**Taking into account existing house building rates in the South West and the fact that these are expected to increase in the longer term whether RPG10 Policy HO1 is revoked or not, no significant differences have been identified between revocation and retention.**

## Transport

The assessment has shown that retention of policies TRAN1 – TRAN10 and the RES priority of 'improve transport networks' will lead to positive/significant positive effects for population and health, air and climatic factors. This reflects their emphasis on encouraging a modal shift towards more sustainable transport modes and increased walking and cycling which has the potential to improve air quality, reduce greenhouse gas emissions and promote healthier lifestyles. As with revocation, investment in strategic transport and telecommunications infrastructure is likely to generate significant regional economic benefits by, for example, supporting existing businesses and encouraging inward investment, addressing issues related to the peripherality of some of the areas within the region itself (most notably the Western sub-region) and generating direct and indirect employment benefits (e.g. benefits associated with capital spend). However, the construction and operation of new transport infrastructure (including the projects listed under Policy TRAN4) may also lead to increased emissions to air with greenhouse gases arising from growth in vehicle movements and construction activity generating minor negative effects in respect of air and climatic factors. Development is also likely to use materials assets (e.g. construction materials) and generate construction waste and whilst there may be potential to reuse aggregates, this has been assessed as having a negative effect in relation material assets.

As with revocation, other effects associated with retention will be largely neutral or uncertain due to the uncertainty over the nature and location of particular elements of transport infrastructure investment. Many of the effects will also depend on the ability to change travel behaviour and the demand for transport.

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

## Infrastructure and Natural Resources

Policies RE1-RE6 concern water, minerals, waste and energy generation and use. Given the diversity of themes within this section of RPG10, the assessment of the retention of the respective policies under each has been summarised in-turn below.

### *Water*

The assessment has identified that with retention and the application of the NPPF, together with other national policies and legislation, there will be a significant positive effect on the water topic and a positive effect with respect to human health. This reflects the emphasis placed by policies RE1 and RE2 on seeking to achieve the sustainable use of water resources, enhance water quality and, together with the NPPF, reduce flood risk. However, it should be noted that the approach to achieving water efficiency will be delivered by mechanisms largely outside the scope of RPG10 such as the building regulations, fiscal measures and incentive schemes – these will all have significant benefits for water availability.

The construction of new water infrastructure 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 landscape. However, some forms of water infrastructure, such as reservoirs, together with measures to improve water quality and reduce abstraction, can also have benefits to biodiversity and landscape. Consequently, effects associated with infrastructure provision have been assessed as uncertain against these topics.

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

### *Minerals*

The assessment has identified positive benefits in relation to the population/human health topic and biodiversity and landscape (in the longer term). However, although RPG10 seeks to protect against adverse environmental impacts arising from extraction and associated activities, limiting extraction in National Parks and AONBs, effects on these SEA topics are considered to be uncertain and it is noted that there remain some extant permissions in these areas where extraction has not yet started.

Whilst RPG10 seeks to make the optimum use of aggregates and maximise recycling, the extraction of a mineral resource would result in a negative effect against the material assets topic due to the loss of resources that are finite. The extraction of aggregates will also inevitably lead to additional traffic, resulting in minor negative effects for air and climate factors, and increased water consumption, generating minor negative effects in respect of water.

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

### *Waste*

The reduction of waste to landfill and minimising the movement of waste will have significant positive effects on climatic factors whilst increasing recovery, recycling and composting has been assessed as having a significant positive effect on material assets. However, it should be noted that the 'regional' targets quoted in Policy RE5 are taken from the Landfill Directive (99/31/EC) and Waste Strategy 2000 with national targets having since been revised. Consequently, its retention could create confusion.

The provision of waste management facilities at or in close proximity to the region's PUAs should reduce traffic levels generating positive effects in respect of air quality. The reduction in the amount of waste disposed of to landfill will reduce the risk of water contamination and may maintain/enhance soil quality.

Landscape and biodiversity may experience negative effects during landfill operations, but neutral or positive effects following restoration of such sites, resulting in a no overall effect. Cultural heritage should also not experience an overall effect, as such sites and their settings are protected by other RPG10 policy and the NPPF and would be expected to be avoided and/or be the subject of investigation.

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

### *Energy Generation and Use*

The assessment has shown that under retention and with the application of the NPPF there would be a significant positive effect on climate factors, reflecting the intent of Policy RE6 to reduce greenhouse gas emissions, increase renewable energy production and promote energy conservation measures (e.g. through design, layout and construction techniques). However, the targets set out in Policy RE6 are outdated and therefore its retention may not achieve the step change in generation promoted by more recent Government policy.

There is potential for both positive and localised negative effects across the other SEA themes associated with renewable energy developments. However, any such effects are heavily dependent on the scale/type of development and its location.

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

## 4.4 **Effects of the Partial Revocation of the South West 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 the non spatial

policies; or

- Retention 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 4.1 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			
Policy SS1	Regional Spatial Strategy	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS3	The Sub-Regional Strategy	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+
Policy SS6	Other Designated Centres for Growth	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?
Policy SS8	The Bristol Area	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
Policy SS9	Bath	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS10	Weston-super-Mare	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS11	Swindon	Revocation	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS12	Gloucester & Cheltenham	Revocation	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy SS13	Bournemouth/Poole	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS14	Taunton	Revocation	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS15	Exeter	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS16	Torbay	Revocation	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS17	Plymouth	Revocation	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy SS18	Cornwall and the Isles of Scilly	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy EN1	Landscape and Biodiversity	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
Policy EC2	Areas of Special Need	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy EC6	Town Centres and Retailing	Revocation	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	0
Policy HO1	Levels of Housing Development 1996-2016	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			
Policy HO3	Affordable Housing	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy HO4	Housing in Rural Areas and the Isles of Scilly	Revocation	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Policy HO5	Previously Developed Land and Buildings	Revocation	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
			/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Policy HO6	Mix of Housing Types and Densities	Revocation	0	0	0	+	+	+	+	?	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	?
Policy TRAN3	The Urban 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 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
Policy TRAN4	Transport Infrastructure Investment Priorities	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy TRAN6	Movement of Goods	Revocation	?	?	?	+	+	+	?	?	?	0	0	0	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
Policy TRAN8	Ports and Inland Waterways	Revocation	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
Policy TRAN9	Airports	Revocation	?	?	?	+	+	+	?	?	?	0	0	0	-	-	-	-	-	-	?	?	?	?	?	?	?	?	?
Policy TRAN10	Walking, Cycling and Public Transport	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	
Policy RE4	Use and Supply of Aggregates	Revocation	?	?	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?	+
Policy RE5	Management and Transportation of Waste	Revocation	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0
Policy RE6	Energy Generation and Use	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?

## Likely Significant Effects

There are a wide range of significant positive effects associated with the revocation of quantified and spatially specific RPG10 policies, benefiting biodiversity, population, air quality, cultural heritage and landscape for example. However, these effects are largely the same as those identified in respect of retention. The revocation of quantified policies in particular (e.g. those relating to housing, waste and renewable energy provision) may also help to reduce confusion in the planning system given that the targets contained within these policies are largely outdated.

Significant negative effects have been identified in respect of material assets reflecting the extraction and use of raw materials required to bring forward new development and associated waste generation. Again, these effects have also been identified for the retention of the Regional Strategy. Neither alternative will remove the need for more houses, jobs and employment land within the region and in this regard 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.

## Proposed Mitigation Measures

Concerning material assets, negative effects associated with new housing development may be mitigated to a degree through other policies in the NPPF including those which seek good design and the sustainable use of minerals. PPS10 also seeks to drive waste management up the hierarchy which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, replacing primary aggregate.

### 4.4.2 Retaining all the Quantified and Spatially Specific Policies

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

Table 4.2 Summary of the Effects of Retaining all the Quantified and Spatially Specific Policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape			
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L				
Policy SS1	Regional Spatial Strategy	Retention	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+		
Policy SS3	The Sub-Regional Strategy	Retention	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+		
Policy SS6	Other Designated Centres for Growth	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	?	?	?	?	?	?	?	?	?		
Policy SS8	The Bristol Area	Retention	0	0	0	+	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS9	Bath	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
Policy SS10	Weston-super-Mare	Retention	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS11	Swindon	Retention	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS12	Gloucester & Cheltenham	Retention	0	0	0	+	+	+	+	/	/	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS13	Bournemouth/Poole	Retention	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy SS14	Taunton	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
Policy SS15	Exeter	Retention	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS16	Torbay	Retention	0	0	0	+	+	+	0	0	0	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS17	Plymouth	Retention	0	0	0	+	+	+	+	/	+	-	-	-	?	?	?	?	?	?	-	-	-	0	0	0	0	0	0
Policy SS18	Cornwall and the Isles of Scilly	Retention	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?	-	-	-	+	+	+	+	+	+
Policy EN1	Landscape and Biodiversity	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			
Policy EC2	Areas of Special Need	Retention	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy EC6	Town Centres and Retailing	Retention	0	0	0	+	+	+	+	+	+	0	0	0	?	?	?	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy HO1	Levels of Housing Development 1996-2016	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
Policy HO3	Affordable Housing	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy HO4	Housing in Rural Areas and the Isles of Scilly	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			
Policy HO5	Previously Developed Land and Buildings	Revocation	0	0	0	0	0	0	+	+	+	0	0	0	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0	0	0	0
Policy HO6	Mix of Housing Types and Densities	Retention	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
Policy TRAN3	The Urban Areas	Retention	0	0	0	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy TRAN4	Transport Infrastructure Investment Priorities	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy TRAN6	Movement of Goods	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			
Policy TRAN8	Ports and Inland Waterways	Retention	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?
Policy TRAN9	Airports	Retention	?	?	?	+	+	+	?	?	?	0	0	0	-	-	-	-	-	-	-	-	-	?	?	?	?	?	?	?	?	?
Policy TRAN10	Walking, Cycling and Public Transport	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0
Policy RE4	Use and Supply of Aggregates	Retention	?	?	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	?	?	+
Policy RE5	Management and Transportation of Waste	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			
Policy RE6	Energy Generation and Use	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	+	+	?	?	?	?	?	?	?	?	?	?	?	?

## Likely Significant Effects

The retention for a transitional period of quantitative or spatially specific policies could have potentially significant negative environmental effects on material assets in respect of RPG10 Policy HO1 Levels of Housing Development 1996-2016. This reflects the increased demand for construction materials and energy together with additional waste generation associated with new housing development, although it is recognised that this policy is now largely outdated.

Several policies were identified as having a significant positive effect on population and human health resulting principally from opportunities for employment and more homes. Policy EN1 Landscape and Biodiversity was assessed to have significant positive effects on biodiversity, soil and landscape SEA topics through its support for the protection and enhancement of these assets. Policies TRAN3 and TRAN10 were assessed as having a significant positive effect against the air quality topic reflecting their potential to reduce traffic congestion and air pollution within the region's PUAs. The reduction of waste to landfill and reduction in the movement of waste associated with Policy RE5 was assessed as having a significant positive effect on climatic factors whilst the policy's intent to increase recovery, recycling and composting was identified as having a significant positive effect on material assets. Policy RE6 was also assessed as having a significant positive effect in respect of climatic factors reflecting the intent of the policy to reduce greenhouse gas emissions, increase renewable energy production and promote energy conservation measures (e.g. through design, layout and construction techniques) although the targets set out in this policy have been superseded.

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 it requires 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. The retention of quantified policies in particular (e.g. those relating to housing, waste and renewable energy provision) may also create confusion in the planning system given that the targets contained within these policies are largely outdated.

## 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 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, concerning material assets, significant negative effects associated with new housing development may be mitigated to a degree through other policies in the NPPF including those

which seek good design and the sustainable use of materials. PPS10 also seeks to drive waste management up the hierarchy which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, replacing primary aggregate.

#### 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 RPG10 or the 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 Policy HO1 there is a significant negative effect on material assets; however, this is the same issue for both retention and revocation.

#### 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 and synergistic nature of the effects. As a consequence, the potential for the plan for the revocation of the South West 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 South West Regional Strategy**

Assessment Topic	Score	Summary
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)	++/?	<p>Key indicators for biodiversity are the number and extent of protected areas and their condition. In particular, the Natural Environment White Paper states that 90% of priority wildlife habitats should be in recovering or favourable condition by 2020. According to the baseline figures, the 2020 target has already been achieved in the South West (95.5% in favourable or recovering condition).</p> <p>The South West Regional Strategy includes a number of policies that provided protection and enhancement of biodiversity and nature conservation features. Revocation of the South West 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 prevents 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 trend in recovering or favourable condition of conservation sites.</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. Statutory and policy protection for AONBs and National Parks will continue to protect the biodiversity value within these areas, at least in so far as the planning system is concerned.</p>

Assessment Topic	Score	Summary
		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.
Population (including socio-economic effects and accessibility)	++/?	<p>The South West Regional Strategy contains a variety of policies concerning population including in respect of housing provision, economic development and access to services. Objectives from the South West RES include support for skills and improvements to business productivity. <b>There is 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> 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. There are six LEPs within the region which aim to improve economic performance and address issue of peripherality. The duty to co-operate and LEPs can also play a key role in assisting local authorities to deliver. This is likely to provide similar significant benefits as retention of the plan.</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. RPG10 establishes sub-regional priorities and comprises associated policies (e.g. in respect of the region's PUAs) 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 delivery of these benefits.</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 which are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of development. New homes are to be in locations accessible by sustainable means of transport. Walking and cycling in particular are healthy activities and the NPPF is complementary to national initiatives such as the cycle to work scheme.</p> <p>Paragraph 114 of the NPPF provides for 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, that 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 cover under arable and horticulture has decreased by 9.1% between 1998 and 2007 across the UK. At the same time development upon previously developed land rose to 60% in 2010. Policies in the NPPF seek to protect best and most versatile land (i.e. ALC Grades 1-3a) although given the scale of likely future development to meet population growth needs, it is likely that some of this will be affected. In addition, the NPPF encourages development upon brownfield land. 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 they are likely to be negative in the short to medium term.</b> However, given the target in the Natural Environment White Paper</p>

Assessment Topic	Score	Summary
		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.
Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	-	<p>The South West is one of the wettest regions in England. However, some areas of the region currently face a lack of water available for new abstractions due to unsustainable over-abstraction during the dry summer months, low flows and the future pressures of increased demand due to population growth.</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 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).</p> <p>Statutory requirements under the Water Framework Directive (WFD) 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 duty to co-operate in order to deliver water efficiency, management and infrastructure benefits.</p>
Air Quality	+/-	<p>Notwithstanding the specific intentions of RPG10 Policy EN2 and the broader spatial strategy which seeks to reduce the need to travel including by car, the assessment revealed that air quality may be affected by new development, particularly where this exacerbates existing air quality issues (for example as a result of increased traffic in the region's principal urban areas). <b>Revocation of the South West Regional Strategy will not affect the current trend in air quality</b> or the localised effects noted, particularly given that the focus of development at the region's PUAs is expected to continue. 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 - 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>
Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	+	<p>The South West could be significantly affected by climate change and RPG10 contains a range of climate change-related policies including those aspects of the plan that seek to reduce the need to travel/achieve a modal change in transport, promote renewable energy generation and energy conservation measures and mitigate flood risk. <b>Revocation will not affect the move towards a low carbon economy.</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 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</p>

Assessment Topic	Score	Summary
		<p>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. Further, there is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 and the UK Renewable Energy Strategy 2009 sets out the path to meet it.</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 co-operate under the Floods and Water Management Act 2010. This contains provisions that cover regional working and co-operation such as the establishment of Regional Flood and Coastal Committees and the bringing together of lead local flood authorities (unitary and county councils) who will have a duty to co-operate to develop local strategies for managing local flood risk. In addition, the Flood Risk Regulations 2009 impose 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>
Waste Management and Minerals	+/-	<p>RPG10 Policy RE5 deals specifically with the management and transportation of waste, seeking to drive the management of waste up the waste hierarchy and locate waste management facilities at or near the region's PUAs in order to reduce transport movements.</p> <p><b>However, revocation of the South West Regional Strategy will not affect waste management in the region or the provision of future waste infrastructure to meet regional needs.</b> The combination of European Directives (notably the Waste Framework Directive and Landfill Directive), Government policy (the 2007 Government Waste Management Strategy and the review of waste policy) and waste planning policy (PPS10) will ensure that waste management is undertaken in a manner consistent with the waste management hierarchy, increasing resource efficiency and reducing waste requiring disposal in landfill.</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. However, the furtherance of mineral extraction, whilst avoiding any environmental sensitive areas, and the use of resources to support new development remains a position that allows for further use of a non-renewable resource (and is reflected in the negative score against this topic).</p>
Cultural Heritage (including architectural and archaeological heritage)	+	<p>The South West has over 6,900 scheduled ancient monuments, over 89,000 listed buildings, over 1,500 conservation areas, and 4 World Heritage Sites. RPG10 contains a specific policy concerning the protection and enhancement of these, and other, cultural heritage assets and protection was implicit across a number of others.</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 remains in place.</b> 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 South West is home to several landscapes of national importance and landscape conservation, together with biodiversity, is a specific policy in RPG10 (EN1).</p>



Assessment Topic	Score	Summary
		<b>Revocation will not affect the intent behind RPG10 as existing legislation and policy remain</b> including protection 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).
Score Key:	Significant Positive ++	Positive +
	No significant effects 0	Negative -
	Significant negative --	Uncertain?
	No relationship n/a	
<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>		

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

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

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

At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution. Macro-scale trends such as the decentralisation of population from urban areas are arguably more difficult to address through local initiatives, as is regeneration which might be more efficiently tackled through regional-scale policy. National transport policies 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 South West Regional Strategy has shown that there will be significant positive effects across a number of SEA topics and particularly in respect of population/human health with significant negative effects identified in relation to material assets, reflecting the extraction and use of raw materials required to bring forward new development and associated waste generation. However, these effects will be largely similar to those if the Regional Strategy were retained.

For the majority of policies, it is difficult to identify specific differentiation between the effects of retention and revocation. This principally reflects the fact that policies have already been put into effect at the local level since RPG10 and the RES were published and in many cases they have been superseded by policy, legislation and guidance published since 2001. Moving forward, 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 RPG10 and the RES. Local plans can therefore readily deliver the aspirations and proposals of the South West Regional Strategy, using additional mechanisms such as the duty to co-operate.

As referred to above, the majority of local plans within the region have been in place since RPG10 was published whilst the objectives and overarching approach to the distribution of new development being taken forward in emerging plans do not appear to be inconsistent with the sub-regional priorities identified in the Plan. Whilst more recently adopted plans (particularly between 2008 and 2010) will have also reflected the emerging draft RSS, the broad policy thrust of this document was in general alignment with that of RPG10 in seeking to focus growth within urban areas (particularly in the northern sub-region) and maximising the efficient use of land. It is also expected that working across local authority boundaries to coordinate strategic priorities will take place under the duty to co-operate and through the

operation of the six regional LEPs. The result is that the broad spatial strategy identified in RPG10 (i.e. focusing the majority of development within the region's PUAs) is likely to continue.

A number of issues are arguably more efficiently and effectively addressed across wider areas than local authority boundaries, in particular major infrastructure provision, biodiversity planning, climate change mitigation and adaptation, and renewable energy. Whilst the duty to co-operate 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 scales 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. However, as noted above it is expected that the broad spatial approach set out in RPG10 will continue under revocation. Further, whilst revocation removes a number of quantitative RPG10 policies including structure plan housing requirements, these policies are outdated with associated targets having been superseded by national targets (e.g. in respect of renewable energy) and the policies of more recently adopted, and emerging, local authority plans (based on up-to-date evidence of local circumstances). In this context, it is AMEC's opinion that revocation will provide clarity to local authorities in the region by removing the potentially confusing position created by the presence of outdated policy. One exception to this general rule however is brownfield land. The NPPF does require preferential use of brownfield land and local planning authorities can still set local targets; however, the removal of the specific target could reduce the amount of brownfield land reused for development and could potentially lead to an increase in development on greenfield sites.

Under revocation, and over the longer term, it is AMEC's view that undesirable inter- and intra-regional differences could be exacerbated as a result of the sum of local decisions which reflect strongly varying circumstances such as housing demand. However, local authorities are expected to work collaboratively with neighbouring authorities and LEPs to determine the regeneration needs of their areas and in this respect several authorities within the region (Christchurch and East Dorset, Gloucester, Tewkesbury and Cheltenham, North Devon and Torridge, and West Dorset, Weymouth and Portland) are preparing joint core strategies which will help to address this issue.

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. Similarly, significant negative effects identified against material assets arising from new development may be in part mitigated through policies contained within local plans (including waste and minerals plans) which promote the sustainable use of materials and seek to drive waste management up the hierarchy.

## 5. Conclusions and Key Findings

### 5.1 What are the Environmental Effects of the Revocation of the South West Regional Strategy?

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

With the revocation of the Regional Strategy, local authorities and others will need to prepare and implement their local plans and take planning decisions having due regard to the NPPF. The assessment of the revocation of the Strategy has shown that there will be significant positive effects, although these will be largely similar to those if it were retained. This reflects the fact that the majority of local plans in the region have been in place since RPG10 was published meaning that, in the short term, the regional planning framework provided by the Strategy will continue to be implemented. In the medium to long term, the intent will be continued through other Government policy, notably the NPPF.

The revocation of the Regional Strategy in particular removes a number of quantitative policies contained within RPG10, most notably structure plan housing allocations. However, these quantitative policies are outdated with associated targets having been superseded by what are in most cases higher national targets (e.g. in respect of renewable energy) and the policies of more recently adopted, and emerging, local authority plans. In this context revocation will bring clarity by removing what are historic, yet presently adopted, Development Plan targets. With regard to housing, it is AMEC's view that, whether the Regional Strategy is revoked or not, housing will be delivered at the higher rates set out in adopted core strategies (which were prepared in the context of the draft RSS) and the future replacement local plans (prepared in accordance with the NPPF) in the longer term. An increase in the number of houses constructed will have clear benefits for population.

As implied above, revocation is unlikely to lead to local authorities not providing an enabling context for growth within their respective local plans given Government encouragement through policy and initiative such as the New Homes Bonus. Similarly the establishment of the LEPs within the region will continue the pursuit of economic growth in the absence of the RES. Growth can lead to negative as well as positive environmental effects. Negative effects identified within this assessment include the significant effects associated with the extraction and use of raw materials required to facilitate new development. However, the same level of effect is identified for retention as well as revocation.

In addition to an assessment of the comprehensive revocation of the Regional Strategy other reasonable alternatives assessed were the partial revocation of the South West 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 as being 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 and revocation of the non spatial policies will also result in a similar range of effects.

The assessment found that there are no policies in RPG10 or RES 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>29</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.

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<sup>29</sup> CLG May 2012, Business Plan 2012-2015

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

- Significant effects on material assets (RPG10 Policy EC1, EC3, EC4 and HO1).

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

- Uncertain effects on biodiversity (RPG10 Policy SS6, SS7, EC1- EC4, HO5, TRAN2, TRAN4, TRAN6, TRAN8, TRAN9, RE1, RE3, RE4, RE6);
- Uncertain effects on population and human health (RPG10 Policy HO5, TRAN4, RE6);
- Uncertain effects on soil (RPG10 Policy SS6, SS7, EC1- EC4, HO5, HO6, TRAN2, TRAN4, TRAN6, TRAN8, TRAN9, RE1, RE6);
- Uncertain effects on water (RPG10 Policy SS6, SS7, EC2, HO5, TRAN4, TRAN8, RE6);
- Uncertain effects on air (RPG10 Policy SS8-SS19, SS21, EC2, EC6, HO5, TRAN4, RE1, RE6);
- Uncertain effects on climatic factors (RPG10 Policy SS8-SS19, SS21, EC2, HO5, TRAN4, RE1);
- Uncertain effects on material assets (RPG10 Policy SS6, SS7, EC2, HO5, TRAN4, TRAN8, TRAN9, RE1, RE6);
- Uncertain effects on cultural heritage (RPG10 Policy SS6, SS7, EC1-EC4, HO5, TRAN2, TRAN4, TRAN6, TRAN8, TRAN9, RE1, RE3, RE4, RE6);
- Uncertain effects on landscape (RPG10 Policy SS6, SS7, EC1-EC4, TCS1, HO5, HO6, TRAN2, TRAN4, TRAN6, TRAN8, TRAN9, RE1, RE3, RE4, RE6).

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</li> </ul>	<p>Joint Nature Conservation Committee (JNCC) report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p><a href="http://www.jncc.gov.uk/page-4241">http://www.jncc.gov.uk/page-4241</a></p> <p><a href="http://jncc.defra.gov.uk/page-4239">http://jncc.defra.gov.uk/page-4239</a></p> <p><a href="http://jncc.defra.gov.uk/page-4238">http://jncc.defra.gov.uk/page-4238</a></p>

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	indicators.	<a href="http://jncc.defra.gov.uk/page-4235">http://jncc.defra.gov.uk/page-4235</a> <a href="http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R.RF">http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R.RF</a> Department for Environment, Food and Rural Affairs (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 (EA) 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 (ONS) reports, specifically Regional Trends and Regional Gross Value Added  Department for Communities and Local Government (DCLG) statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region
<b>Human Health</b>	Annual (where information allows) trends in: <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>	ONS on health Home Office, Crime Survey for England and Wales DCLG 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>	DCLG 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> </ul>	EA and Defra <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a> Water Company (various) June Returns

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> <li>Per capita water consumption.</li> </ul>	Water Company (various) June Returns
<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>	Department for Energy and Climate Change (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 South West Mineral Planning Authorities
<b>Cultural heritage, including architectural and archaeological heritage</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>% of heritage assets of different types that are at risk.</li> </ul>	English Heritage 'Heritage at risk report'
<b>Landscape and Townscape</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Change in 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**

<b>Objectives and Context</b>	
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.
<b>Scoping</b>	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	<p>The Consultation Bodies in England<sup>30</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>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 <b>Appendix E</b> 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.
<b>Alternatives</b>	
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> .

<sup>30</sup> The Environment Agency, English Heritage and Natural England

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> .
<b>Baseline Information</b>	
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.
<b>Prediction and Evaluation of Significant Environmental Effects</b>	
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> .
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> .

<b>Mitigation Measures</b>	
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> .
<b>Environmental Report</b>	
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.
<b>Consultation</b>	
The SEA is consulted on as an integral part of the plan-making process.	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.  This Environmental Report will be published for consultation in summer 2012.
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.	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.  This Environmental Report will be published for consultation in summer 2012.
<b>Decision-making and Information on the Decision</b>	
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).
<b>Monitoring Measures</b>	
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	Details of this are provided in <b>Section 5.2</b> .

information in the SEA.	
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 **Friday 1 February 2013**. 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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