



Department for
Communities and
Local Government

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

Post Adoption Statement

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Summary of Key Facts

Name of Responsible authority:	Department for Communities and Local Government
The adopted Plan:	The revocation of the Regional Strategy for the South West
Date of revocation:	20 May 2013
Address where documents can be consulted:	Eland House, Bressenden Place London SW1E 5DU

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Preface

This document is the Post Adoption Statement for the plan to revoke the Regional Strategy for the South West (“the Plan to Revoke”). The Post Adoption Statement is a requirement¹ of the Strategic Environmental Assessment process to which the Plan to Revoke the Regional Strategy has been subject. Strategic Environmental Assessment is an assessment process that supports decision making by identifying, characterising and evaluating the likely significant effects of a plan or programme on the environment and determining how any adverse effects may be mitigated or where any beneficial effects may be enhanced.

The Regional Strategy for the South West comprises the regional spatial strategy for the region (published by the then Secretary of State in 2001) and the regional economic strategy for the region (published by the South West of England Regional Development Agency in May 2006).

The Post Adoption Statement is being published in parallel with the laying of The Regional Strategy for the South West (Revocation) Order 2013 (S.I. 2013/935)², which will come into force on 20 May 2013.

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

² The Order also revokes all directions preserving policies contained in saved structure plans in the region except for the direction made in September 2007 in respect of the Somerset & Exmoor National Park Joint Structure Plan Alteration 1991 - 2011 so far as it preserves policy 6 (Bristol/Bath Green Belt).

Introduction

1.1 Regional Strategies

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

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

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

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

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

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

On revocation of the South West Regional Strategy (and any saved structure plan policies), the statutory development plan would comprise any saved local plan policies and adopted development plan documents. The statutory development plan may in future include any neighbourhood plans that are made under the relevant new provisions of the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act 2011.

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

- The **National Planning Policy Framework** was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment.
- **Planning policy for traveller sites** which was published in March 2012.
- **Planning Policy Statement 10: Planning for Sustainable Waste Management (Planning Policy Statement10)** until it is replaced with the national waste planning policy, to be published as part of the National Waste Management Plan for England.

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

1.2 The Plan to Revoke the South West Regional Strategy

The South West Regional Strategy combines the regional spatial strategy for the region and the regional economic strategy for the region.

Regional Planning Guidance note 10, published in September 2001, 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, Regional Planning Guidance note 10 became the regional spatial strategy for the region and part of the statutory development plan. On 1 April 2010 the regional spatial

strategy, together with the regional economic strategy, became the Regional Strategy for the South West under the Local Democracy Economic Development and Construction Act 2009.

Drawn up in accordance with national policy at the time, Regional Planning Guidance note 10 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. Regional Planning Guidance note 10 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 Regional Planning Guidance note 10 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.

These policies have been put into effect since Regional Planning Guidance note 10 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 revisions to the Regional Spatial Strategy for the South West, 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, Regional Planning Guidance note 10 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 Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) 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 revisions to the Regional Spatial Strategy as it emerged, particularly those plans adopted between 22 July 2008 and 6 July 2010 (the period between the publication of the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes and the Government's announcement of its proposal to revoke regional strategies).

The Regional Economic Strategy for South West England 2006 – 2015 was produced in compliance with Section 7 of the Regional Development Act 1998. Its primary focus is to provide a shared vision for the development of the South West's economy to 2015. This vision is realised through three strategic objectives. These are: support business productivity; strong and inclusive communities; and an effective and confident region. These in turn are delivered via eleven headline economic priorities and associated delivery

activities. It was developed with regional partners and was subject to a formal consultation and appraisal process.

There is a strong and complementary relationship between Regional Planning Guidance note 10 and the Regional Economic Strategy:

- the Regional Economic Strategy vision, drivers and strategic objectives broadly reflect those developed as part of the previous Regional Economic Strategy (covering the period 2003-2012), which were themselves informed by the spatial strategy set out in Regional Planning Guidance note 10;
- 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;
- Regional Planning Guidance note 10 and the Regional Economic Strategy 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
- Regional Planning Guidance note 10 includes policies that support and are consistent with the headline economic priorities outlined in the Regional Economic Strategy.

Revocation of the South West Regional Strategy (and saved structure plan policies³) would leave the statutory development plan as comprising of any saved local plan policies and adopted development plan documents.

Across the South West approximately one third of the 39 local planning authorities have adopted core strategies under the Planning and Compulsory Purchase Act 2004 including seven who have adopted Local Plans since May 2011. The remaining local planning authorities in the South West, who were yet to adopt a development plan document under the Planning and Compulsory Purchase Act 2004, have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990. Out of the 39 local authorities, there are four local planning authorities that do not currently have a local plan adopted shortly before or after the publication of Regional Planning Guidance note 10 or have an adopted core strategy. Additionally, 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. These authorities are more likely to be affected by the revocation of the Regional Strategy as some, if not all, will need to review and update their local plan to reflect the National

³ Except for policy 6 of the Somerset & Exmoor National Park Joint Structure Plan Alteration 1991 – 2011, which relates to the Bristol/Bath Green Belt.

Planning Policy Framework policies and the objectively assessed needs of the local community.

Once the Regional Strategy is revoked, local councils should, in line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, and in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, approve development that accords with the local plan unless material considerations indicate otherwise. Where that plan is out of date, councils must, unless material considerations indicate otherwise, grant planning permission for development that is sustainable without delay. Out of date local plans will leave councils vulnerable to speculative development; the Government is encouraging local councils to put in place local plans as soon as possible.

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

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

- In Bristol, Bristol City Council is working with the West of England Local Enterprise Partnership and the Homes and Communities Agency 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 wider local regeneration in partnership with the Homes and Communities Agency.
- 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 Area of Outstanding Natural Beauty, 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.

- 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.

Authorities across the region have also 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.

In addition, there are non-statutory Local Enterprise Partnerships (of which there are six in the region). This combination of measures will ensure that strategic planning operates effectively in the absence of the Regional Strategy.

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

The Plan for the purposes of the Strategic Environmental Assessment is the Plan to Revoke the South West Regional Strategy (the Regional Spatial Strategy and Regional Economic Strategy) and to leave in place a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth. The Plan to Revoke is set out in

more detail in Section 2 of the Environmental Report published in November 2012.

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

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework and a planning policy on Travellers sites, and has commenced the duty to co-operate provided for in the Localism Act. In addition, in a judgment by the Court of Justice of the European Union⁴, the Court held that 'in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment'. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent case law, to update and build on the assessments which were described in the previous Environmental Reports.

AMEC Environment and Infrastructure UK Ltd were commissioned to carry out the further assessment and to prepare updated Environmental Reports. A public consultation exercise undertaken on the updated Environmental Report for the South West ran from 30 November 2012 until 1 February 2013. Updating of, and consultation on, the Environmental Reports for the other seven regions has been staggered. The South West Regional Strategy is the seventh of the eight to have completed consultation on the Environmental Report. This has enabled the Secretary of State to understand the environmental effects of revoking the Regional Strategy and reasonable alternatives to revocation, including partial revocation, and to consider the views of the statutory bodies and the public who responded to two public consultations.

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

1.4 Purpose of the Post Adoption Statement

⁴ The judgment in Case C-567/10 Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale.

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

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

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

How environmental considerations have been integrated into the plan

2.1 Environmental Considerations in the Plan to Revoke the South West Regional Strategy

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

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

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

The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues.

2.2 Environmental Considerations in the Strategic Environmental Assessment

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

- historical reductions in biodiversity and natural/semi-natural habitats: Some natural habitats and protected species have declined over the years due to agriculture (reduced farmland and woodland bird species), although increased development and recreational pressure has also had an adverse effect;
- issues associated with population increase: Between 2000 and 2010 the population of the South West grew by 7%, faster than the England average. The region's population is forecast to grow by 6.1% reaching a total of just over 5.5 million by 2020. Population growth will be accompanied by changing age-structure and the age group expected to grow most in size is expected to be persons aged 65 or over which may place pressure on services and facilities and reduce accessibility, particularly for those in rural areas. Housing affordability is a significant issue which may prevent first time buyers starting on the property ladder and lead to increased homelessness;
- intra-regional economic disparity: Economically, the South West is one of the most successful regions in the country. It had the fourth highest Gross Value Added 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 Gross Value Added per head and Cornwall/the Isles of Scilly and Torbay the least. Pockets of severe deprivation exist in the region;
- high car dependency: The South West region is one of the most travel intensive regions in the UK. With the volume of road traffic on major roads high and public transport usage low, there is a need to encourage alternatives to car travel and to further consider the inter-relationship between housing and employment growth and the timing and delivery of transport measures/investment;
- health inequalities: Life expectancy 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;

- loss of agricultural land: The population and growth centres in the South West generally lie to the eastern half of the region. This area tends to enjoy best and most versatile agricultural land (particularly in the areas of Wiltshire, Sedgemoor and Exeter) which may be under threat from future development. Climate change will also have a detrimental impact on soil structure in the region especially for sandy, silty and light loamy soils which are adversely affected by enhanced runoff;
- imbalance between water demand and supply in some parts of the region: 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. There is expected to be an increase in the demand for water in the region of around 1.4% by the 2020s;
- air quality: There are currently 41 Air Quality Management Areas that have been designated across 22 local authorities in the region. Most Areas are established due to high levels of nitrogen dioxide as a result of traffic. There are growing pressures on air quality in particular locations, most notably due to the increasing traffic across the region;
- flooding and climate change: 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. Hotter and drier summers and warmer and wetter winters (based on predictions for the effects of climate change in the 2080s for the region) are expected whilst a rise in sea level from climate change will lead to coastal change and habitat loss. At present only 1.6% of the region's energy is produced from renewable sources;
- waste: 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 Landfill Directive targets);
- erosion of historic assets: There is an increasing number of heritage assets identified as being at risk in the region;
- pressures on landscape character: The South West is one of the fastest growing regions in terms of population growth, with associated levels of development and pressures on resources likely to have a substantial impact on landscape character.

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

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

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

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

In line with the requirements of the Directive and Regulations and the guidance in the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the Strategic Environmental Assessment Directive, the assessment process predicted the significant environmental effects of the Plan to Revoke the South West Regional Strategy against all of the topic areas listed in **Table 2.1**. This was done by identifying the likely changes to the baseline conditions as a result of implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or

rare. Where numerical information was not available, the assessment was based on professional judgement and with reference to relevant legislation, regulations and policy.

Where it was identified that revocation of a Regional Strategy policy would have an effect on the environment and that this would have a consequence for local plan policies and/or local areas, the assessment examined those effects in more detail. Comparisons were made between the policies in Regional Planning Guidance note 10 on housing allocations, allocations of pitches for gypsies, travellers and travelling showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment and policies on the green belt and the heritage environment with the equivalent policies in local plans and /or core strategies in the region. This analysis was set out in Appendix C of the updated Environmental Report and was reflected, where relevant in the assessment of individual plan policies in Appendix D of the updated Environmental Report.

Additionally, policies and associated targets contained within the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) were also reflected within the assessment where appropriate. This was in recognition of the fact that, whilst preparation of the South West Regional Spatial Strategy 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 revised Regional Spatial Strategy as it emerged, particularly those adopted between 22 July 2008 and 6 July 2010 (the period between the publication of the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes and the Government's announcement of its proposal to revoke regional strategies).

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

Both Environmental Reports (issued in October 2011 and in November 2012) documented the findings of the assessment, outlining where any likely significant effects were identified and proposing, where appropriate, mitigation measures. These findings have then been taken into account during the preparation of the Plan to Revoke and before the final decision was taken to adopt the Plan.

How the Environmental Reports have been taken into account

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

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

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

Strategic Environmental Assessment	Plan to Revoke	Relationship
Framework and its influence.		
Initial assessment of the impact of the duty to co-operate took place prior to the commencement of the new duty and required outline of assumptions with regard to operation.	The provisions which create a new duty to co-operate were commenced when the Localism Act received Royal Assent on 15 November 2011. They require local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.	Commencement of the duty to co-operate provided greater certainty to the assessment, reflected in updated assessment, documented in the updated Environmental Report (published in November 2012).
Assessment considered the effects of revocation on local planning authorities and provided analysis of local plans highlighting where plans were out of date or silent on key planning policy matters.	The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'.	The Strategic Environmental Assessment provided up to date summary of current position on the adoption and status of local plans, with indication of the number of authorities who needed to take action within each region regarding the revision and update of local plan policies.
Reporting		
The key findings of the Environmental Report are presented along with the Government's responses in Table 3.2 below. The extent to which the findings have informed the final Plan to Revoke is detailed in Chapter 5 of this Post Adoption Statement.		
Consultation		
The consultation responses to the consultation on the initial and updated Environmental Reports are presented along with the Government's responses in Tables 4.1 and 4.2 in Chapter 4 . The extent to which the consultation has informed the final Plan to Revoke is detailed in Chapter 5 of this Post		

Strategic Environmental Assessment	Plan to Revoke	Relationship
Adoption Statement.		
Monitoring		
Proposals for monitoring	Section 5 'Put Communities in charge of planning' of the Department for Communities and Local Government business plan 2012 – 2015 includes specific monitoring actions for the Department regarding the local plan making progress by authorities and on compliance with the duty to co-operate.	The Department for Communities and Local Government is able to jointly meet requirements for monitoring environmental effects of the implementation of the Plan to Revoke with business plan commitments and by undertaking periodic review of data for specific monitoring information.

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

Table 3.2 Key findings of the Environmental Report

No	Key Environmental Report findings	Response
1.	There will be significant positive environmental effects from the revocation of the South West Regional Strategy, although these will be largely similar to those if the Regional Strategy were retained.	The Government notes the findings of the updated Environmental Report and considers that the Plan to Revoke is largely positive in its effect although it is acknowledged that these effects are largely similar to those of retention.
2.	The only area where revocation of the South West Regional Strategy would lead to significant negative effects is in relation to material assets due to the extraction and use of aggregates and	The Government notes these effects and that they are similar to those for retention. The Government considers that

No	Key Environmental Report findings	Response
	<p>construction materials to support housing and economic development and associated waste generation. A similar policy performance would be likely if the Regional Strategy were retained.</p>	<p>these potentially negative impacts on the environment can be addressed by authorities, including mineral and waste planning authorities, working collaboratively through the duty to co-operate within the policy context set by the National Planning Policy Framework.</p> <p>The National Planning Policy Framework sets out a set of core land use planning policies which should underpin both plan-making and decision-taking – including that planning should encourage the re-use of existing resources and encourage the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the statutory duty to co-operate. The Framework also expects local planning authorities to set out the strategic priorities for the area in the local plan and include strategic policies to deliver the provision of infrastructure for waste management and the provision of minerals.</p> <p>The National Planning Policy Framework states that local planning authorities should identify and include policies for extraction of mineral resource of local and national importance in their area and, so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering</p>

No	Key Environmental Report findings	Response
		<p>extraction of primary materials, whilst aiming to source minerals supplies indigenously. Insofar as aggregates are concerned, the Framework expects local planning authorities to consider the contribution of secondary, recycled and marine dredged sources as part of the preparation of Local Aggregate Assessments. Technical advice will still be provided through Aggregate Working Parties and the duty to co-operate, along with the practice guidance on the Managed Aggregate Supply System, should assist in ensuring minerals planning authorities work together with the industry to ensure that a steady and adequate supply of minerals is provided in a sustainable manner.</p> <p>Planning Policy Statement 10 makes it clear that waste planning authorities should plan for waste management needs in their area, seeking to drive waste management up the waste hierarchy (i.e. prevention, reuse, recycled, other recovery and disposal) 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. Planning Policy Statement 10 also requires planning authorities to set out its ambitions for additional waste management capacity required, based on an assessment of existing and forecast waste arisings, and expects planning authorities to undertake monitoring to enable them to adapt to changing circumstances if required.</p> <p>The proactive plan-led approach of</p>

No	Key Environmental Report findings	Response
		<p>the National Planning Policy Framework and Planning Policy Statement 10 sits within a wider set of requirements on resource use. Member States are required under European Law to recycle 50% of household waste and 70% of non-hazardous construction and demolition waste by 2020. In addition Member States are required to meet targets for the diversion of biodegradable municipal waste from landfill by 2013, 2016 and 2020. Local planning authorities, through the preparation of sound, up-to-date plans, and working together through the duty to co-operate, play a pivotal role in providing the infrastructure required to meet these needs.</p>
3.	<p>For the majority of South West Regional Strategy 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 Regional Planning Guidance note 10 policies in particular have already been put into effect at the local level and the degree 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 National Planning Policy Framework is broadly compatible with the sustainable development principles employed in the South West Regional Strategy.</p>	<p>The Government notes the findings of the Environmental Report. In particular it notes the findings on page v of the Non-Technical Summary that “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 Regional Spatial Strategy, <i>developed from 2004 onwards.</i>”</p> <p>Furthermore, the Government acknowledges the degree to which responsibilities are already devolved to local authorities, in line with the objective of the National Planning Policy Framework and the Localism Act to ensure that local plans, and where possible neighbourhood plans, provide the basis for local planning decisions. In Section 2.4 of the updated Environmental Report, the Government states that it</p>

No	Key Environmental Report findings	Response
		<p>proposed the plan to revoke the South West Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth. Every local area has its own set of needs and priorities, its aspirations, unique features and heritage. Only local people understand this so when they have tools to plan, development happens through consensus by recognition of the benefits of development to the community and with wider benefits for growth.</p> <p>The purpose of the planning system is to contribute to the objective of achieving sustainable development (as set out in section 39(3) in the Planning and Compulsory Purchase Act 2004), and section 39(2) of the 2004 Act requires local planning authorities, when exercising their plan-making functions, to contribute to this objective. Specific reference is made in the National Planning Policy Framework to the five 'guiding principles' of sustainable development set out in the UK Sustainable Development Strategy Securing the Future. These are: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy, promoting good governance; and using sound science responsibly. The National Planning Policy Framework defines sustainable development by reference to twelve planning principles and the policies in paragraphs 18 to 219, taken as a</p>

No	Key Environmental Report findings	Response
		<p>whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.</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 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. The Framework 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.</p>
4.	<p>The duty to co-operate could well address a wide range of strategic issues for example green infrastructure, but there is uncertainty as to how this might work, particularly in the short to medium term, both by topic and geographically. Some issues such as renewable energy, biodiversity enhancement or landscape conservation, which typically benefit from being planned at a wider geographical scale, could be ignored or their potential not realised.</p>	<p>The Government notes the findings of the updated Environmental Report. In particular it notes the findings in Section 5 that the majority of local plans in the region have been adopted since Regional Planning Guidance note 10 was published and therefore, 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 policy such as the National Planning Policy Framework.</p> <p>In noting the findings of the Environmental Report, the Government considers that it has</p>

No	Key Environmental Report findings	Response
		<p>put in place measures to reduce the possible uncertainty of effects for the revocation of the Regional Strategy. The duty to co-operate came into force on 15 November 2011. This statutory duty, set out in section 33A of the Planning and Compulsory Purchase Act 2004 Act (inserted by the Localism Act 2011), requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The National Planning Policy Framework makes clear cross boundary co-operation should apply in particular to the strategic priorities set out in paragraph 156. These matters include climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The duty to co-operate not only means that authorities are required to work collaboratively when developing their local plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of local plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>The National Planning Policy Framework sets out a set of core land use planning principles which should underpin both plan-making and decision-taking – including encouraging the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National</p>

No	Key Environmental Report findings	Response
		<p>Planning Policy Framework's polices and the statutory duty to co-operate. These include the requirements for local authorities to have a positive strategy to promote energy from renewable sources; design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily; approve applications for renewable energy if the impacts are (or can be made acceptable); and co-operate to deliver strategic outcomes which include mitigating climate change.</p> <p>The National Planning Policy Framework's proactive, plan-led approach sits within a wider set of requirements and policy initiatives to deliver renewable energy. These include the UK's legally binding target that by 2020 15% of energy should come from renewable energy. Additionally, there is a specific duty on local planning authorities to ensure their local plan includes policies designed to mitigate climate change.</p> <p>Existing legislation concerning environmental protection remains (legislation includes the Habitats Directive, Water Framework Directive and the Floods and Water Management Act 2010 – which includes a duty to co-operate). Local planning authorities are required by the National Planning Policy Framework to undertake a Strategic Flood Risk Assessment, preferably at a catchment level through joint co-operation.</p> <p>Six Energy National Policy Statements (including one on nationally significant renewable energy infrastructure) set out the</p>

No	Key Environmental Report findings	Response
		<p>need for certain infrastructure and policies against which applications for development consent for energy projects will be considered. These documents include the requirements for applicants to address economic, social and environmental impacts of a scheme; they also enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted.</p> <p>There are many cross-boundary policy arrangements in place in the South West. Local planning authorities working together to prepare joint plans include: 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).</p> <p>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. Mineral planning authorities work together to provide a steady and adequate supply of aggregate minerals.</p> <p>The National Planning Policy Framework expects the planning system to protect and enhance valued landscapes. It states that planning should protect and enhance valued landscapes, minimise impacts on biodiversity and provide net gains in biodiversity</p>

No	Key Environmental Report findings	Response
		<p>where possible. It makes clear that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, and that to minimise impacts on biodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority boundaries.</p> <p>Nature Improvement Areas provide cross-boundary projects where partners work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The initial 12 Nature Improvement Areas included Wild Purbeck and Northern Devon. There is also joint working in the planning system through the preparation of the Dorset healthland joint development plan document, involving Bournemouth and Poole local planning authorities.</p> <p>Reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live is part of the Government's broader approach set out in, for example, 'Enabling the transition to a green economy', and the Government's 'Biodiversity 2020' strategy, and in the context of statutory requirements. Strategic partnerships, including Local Nature Partnerships such as those for Bournemouth Dorset Poole, Cornwall and Isles of Scilly, Devon, Gloucestershire, Plymouth, Somerset, and Wiltshire and Swindon and the new arrangements for Lead Local Flood Authorities, are examples of how co-operation is</p>

No	Key Environmental Report findings	Response
		already a key part of the wider framework addressing the issues raised.
5.	<p>Whilst revocation of the South West Regional Strategy removes a number of quantitative Regional Planning Guidance note 10 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). 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 National Planning Policy Framework does require preferential use of brownfield land and local planning authorities can still set local targets; however, the removal of the specific target within Regional Planning Guidance note 10 could reduce the amount of brownfield land reused for development and could potentially lead to an increase in development on greenfield sites.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>Section 2.2 of the updated Environmental Report states that the National Planning Policy Framework “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.’ This approach allows local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction.”</p> <p>The National Planning Policy Framework states that it is ‘highly desirable that local planning authorities should have an up-to-date plan in place’. Local plans must be consistent with the National Planning Policy Framework, including measures to promote renewable energy and significantly boost housing supply.</p> <p>Additionally, paragraph 158 of the Framework requires each planning authority to ensure that the local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>Delivery of more up-to-date plans is</p>

No	Key Environmental Report findings	Response
		<p>increasing: across the South West there are 14 planning authorities with adopted core strategies, including 7 who have adopted Local Plans since May 2011. In addition 12 planning authorities have published their plans. Overall, 66% of councils now have a published plan.</p> <p>There is a package of advice and support being offered to all councils, from the Local Government Association, the Planning Inspectorate and the Department, to support councils to get local plans updated or in place. The Planning Inspectorate is working in particular with authorities with published plans about to be examined, and the Local Government Association's Planning Advisory Service is offering support to councils working towards plan publication. The Inspectorate continues to work quickly to examine plans already submitted, and the focus now is on maintaining a strong pipeline of plans coming through for examination.</p> <p>Furthermore, the Government has already introduced, or is introducing, a range of measures to make the planning system work more effectively and efficiently. These measures are designed to create the conditions that support local economic growth, increase building and remove barriers that stop local businesses creating job. Specific measures build on the measures in the Localism Act and the introduction of the National Planning Policy Framework and include:</p> <ul style="list-style-type: none"> • proposals to extend permitted development rights for a trial

No	Key Environmental Report findings	Response
		<ul style="list-style-type: none"> • instructing the Planning Inspectorate to respond quickly to all major economic and housing-related appeals; • proposals to speed up the process for determining planning appeals; • giving developers extra time to get their sites up and running before planning permission expires; and • through the Growth and Infrastructure Bill, giving new powers to the Planning Inspectorate to take over the role of making planning decisions in an area if the local authority has a record of consistently slow or poor quality decisions. <p>One of the 12 planning principles set out in the National Planning Policy Framework is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The National Planning Policy Framework makes it clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111), depending on their local circumstances. This recognises that for some areas brownfield sites may not be sustainably located or that such land may have acquired value for the surrounding community greater than some greenfield land. The Government recognises that there will be increased pressure on greenfield development in the</p>

No	Key Environmental Report findings	Response
		<p>medium to longer term to meet housing need in the Region, although the policies in the National Planning Policy Framework may reduce the pressure for development on such land.</p>
6.	<p>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 or exacerbate socio-economic disparities (reflected in the Strategic Environmental Assessment as effects on the population and health topics) which are difficult to reconcile without significant interventions.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In the South West, annual housing building rates since 2001 have been below the regional target set out in Regional Planning Guidance note 10. Further, the updated Environmental Report notes that 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 Principal Urban Areas). In this respect, retention of this policy could create confusion in planning for housing delivery at the sub-regional level. The Report expects that that housing will be delivered at the higher rates set out in adopted and emerging plans (although planned housing growth is below the levels set out in the draft revised Regional Spatial Strategy).</p> <p>The Government considers that the effects on the population and health Strategic Environmental Assessment topics are mitigated by measures outside the plan to revoke.</p> <p>The National Planning Policy Framework asks authorities to use</p>

No	Key Environmental Report findings	Response
		<p>their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework. They should prepare Strategic Housing Market Assessments to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>The New Homes Bonus is a powerful and permanent incentive for local authorities and communities to increase their aspirations for housing growth. New Homes Bonus is based on the additional council tax raised - using the national average in each band - for additional homes (new builds and conversions) and long term empty properties brought back into use.</p> <p>The National Planning Policy Framework makes clear that cross boundary co-operation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local plans are prepared in this context – in addition to the tests of soundness the examination will</p>

No	Key Environmental Report findings	Response
		determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.
7.	At a broader scale, there could be an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences (with differential effects on the Strategic Environmental Assessment topics population and human health in regions arising from the differing viability of (affordable) housing, employment opportunities and transport infrastructure) and reliance on other policy instruments for their resolution.	<p>The Government notes the findings of the updated Environmental Report. The Government considers that there are other, broader drivers of spatial change. For instance, there are 6 Local Enterprise Partnerships in the South West whose remit is to drive growth across their area making the most of its inherent strengths. These cover: West of England, Gloucestershire, Swindon and Wiltshire, Dorset, Heart of the South West and Cornwall and the Isles of Scilly.</p> <p>We note the judgement that there could be a reliance on other policy instruments. The Local Growth White Paper 2010, "Realising Every Place's Potential" established the Government's position on regional economic circumstances and set the framework for the ongoing activity of Local Enterprise Partnerships and investments such as the Growing Places Fund and the Regional Growth Fund.</p>
8.	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 (such as increased demand for travel, waste management facilities and water resources and the effects from land take and disturbance on	<p>The Government notes the findings of the updated Environmental Report and judgements made on the potential wider effects.</p> <p>The Government has introduced broader policy measures outside of the Plan to Revoke, for example, the New Homes Bonus is designed to ensure that communities which are growing can mitigate the strain of increased housing and respond to community ambitions, for example by providing local services,</p>

No	Key Environmental Report findings	Response
	biodiversity and landscapes).	<p>unlocking infrastructure and community facilities. The provisional allocations for all of England's local authorities were published in December 2012. The New Homes Bonus complements broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>The National Planning Policy Framework asks authorities to use their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (such as the protections on Green Belt, high grade agricultural land and Areas of Outstanding Natural Beauty). They should prepare Strategic Housing Market Assessment to assess this need, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>They should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The practice guidance on Strategic Housing Land Availability Assessment states that the study area should preferably be a sub-regional housing market area, but may be a local planning authority area, where necessary.</p>

No	Key Environmental Report findings	Response
		<p>The National Planning Policy Framework makes clear that cross boundary co-operation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in preparing the development plan.</p> <p>The National Planning Policy Framework directs significant development towards the most sustainable locations. For example, developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure than the system of planning obligations where lengthy negotiations often create severe delays.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources), such as:</p>

No	Key Environmental Report findings	Response
		<ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the European Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), the Floods and Water Management Act 2010); • existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 and 11, and Planning Policy Statement 10); • other government policy (such as that articulated in the Natural Environment White Paper); • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.

How consultation on the Environmental Reports has been taken into account

4.1 Overview

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

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

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

4.2 Scoping Consultation

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

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

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

4.3 Public Consultation on the initial Environmental Report

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

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the initial Environmental Reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government Strategic Environmental Assessment Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). Ten responses dealt specifically with the initial Environmental Report for the South West - only five responses were received from local planning authorities within the South West. A further 69 dealt solely with the initial Environmental Reports for regions other than the South West. A summary of the 34 consultation responses relevant to the initial South West Environmental Report is set out at Appendix F of the updated Environmental Report.

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

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

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The overall approach taken to Strategic Environmental Assessment	The Environment Agency 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	Section 1 of the updated Environmental Report set out how it met the requirements of the Strategic Environmental Assessment Directive.

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>an opportunity to highlight issues that local authorities could address in partnership to achieve sustainable development. They considered that Regional Planning Guidance note 10 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 National Planning Policy Framework.</p> <p>English Heritage agreed in principle with the overall approach taken in assessing the likely impacts on the environment as a result of the revocation of Regional Planning Guidance note 10, but had concerns that not all the potential impacts on the 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>Natural England recognised</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 Strategic Environmental Assessment topics. This included Cultural Heritage – including architectural and archaeological heritage.</p>

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. 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 Regional Spatial Strategy, they had no specific comments on the content.</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 Strategic Environmental Assessment topics, including Biodiversity.</p> <p>As the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes was not finalised (and therefore not revoked), the Regional Strategy under consideration is Regional Planning Guidance note 10 and the Regional Economic Strategy. However, some local authority plans in the South West have taken account of policies within the Draft Regional Spatial Strategy as it emerged, particularly those adopted between July 2008 and July 2010 (the period between the publication of the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes and the Government's announcement of its proposal to revoke</p>

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<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 National Planning Policy Framework, 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>regional strategies when work on the Draft Regional Spatial Strategy stopped). This has been reflected within this assessment where appropriate.</p> <p>Section 2.4 of the updated Environmental Report covered reasonable alternatives to the plan to revoke the Regional Strategies.</p> <p>The National Planning Policy Framework was published in March 2012. The short, medium and long-term effects have been assessed as explained in Section 3.2.3 of the updated Environmental Report.</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 of the updated Environmental Report set out the approach to the assessment of secondary, cumulative and synergistic effects.</p>
Assessment	The statutory consultees drew attention to more up to date data that could be included in the Environmental Report, for	The updated Environmental Report updated the baseline evidence (including

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>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>reference to River Basin Management Plans in chapter 5 of Appendix E) 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 Strategic Environmental Assessment topics, taking into account the content of local plans. Mitigation measures were proposed where significant impacts were predicted. Arrangements for monitoring possible effects are set out and a non-technical summary was provided.</p>
Reliance on the National Planning Policy Framework	<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 updated Environmental Report took account of the policies set out in the Framework.</p>
Policy Change	<p>Several respondents thought that the revocation of Regional Policy Guidance note 10 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 October 2011 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	Natural England and the Environment Agency 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 National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The National Planning Policy Framework 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	English Heritage stated that the initial Environmental Report failed to refer to the Cornwall and West Devon Mining	The impacts of revoking, retaining or partially revoking the Regional Strategy have been

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>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 Regional Planning Guidance note 10.</p> <p>Purbeck District Council 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</p>	<p>assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics, including Cultural Heritage. Specific reference is made to World Heritage Sites including the West Devon Mining Landscape in the baseline contained in Appendix E to the updated Environmental Report and in the assessment at Appendix D.</p> <p>Protecting Green Belt land is covered in section 9 of the National Planning Policy Framework. Policy SS4 of Regional Planning Guidance note 10 required local planning authorities to define and review Green Belt boundaries. The defined boundaries of Green Belts are matters for the local plan and, with the Purbeck Local Plan (Part 1) being adopted on 13 November 2012, the South East Dorset Green Belt within Purbeck is now protected in an adopted statutory plan.</p> <p>The updated Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised</p>

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	coastlines.	by consultees. Individual policies for the planning of individual topics is described in the updated Environmental Report, drawing on the policies set out in the National Planning Policy Framework. For example, paragraph 105 of the National Planning Policy Framework 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.

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

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 Strategic Environmental Assessment Directive Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the Plan to Revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.
- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the Strategic Environmental Assessment Directive Annex I(f) topics.
- Identifying, characterising and assessing any likely significant effects of the Plan and the reasonable alternatives, based on a common

interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects.

- Providing additional information on likely secondary, cumulative and synergistic, short, medium and long-term, permanent and temporary, positive and negative effects of the Plan to Revoke the regional strategies.
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy.
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate.
- Providing further information that includes proposals to monitor any significant effects.
- With specific regard to the assessment of the revocation of the South West Regional Strategy, reflecting the policies and associated targets of the draft revised Regional Spatial Strategy within the assessment where appropriate.

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

4.4 The Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the South West Regional Strategy ran from 30 November 2012 until 1 February 2013.

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

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the Regional Strategy for the South West 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 have been identified, described and assessed; and,

- the arrangements for monitoring.

In total, 13 detailed written responses were received summarised below by interest group:

- 4 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, and the Countryside Council for Wales);
- 4 Local planning authorities (Dorset County Council, Somerset County Council, North Somerset Council and Purbeck District Council);
- 3 Non-Governmental Organisations and local pressure groups (Town and Country Planning Association, Campaign to Protect Rural England South West and the Royal Town Planning Institute South West); and
- 2 Industry representatives (EDF Energy and RenewableUK).

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

Table 4.2 Summary of consultation responses to the updated Environmental Report

Issue	Summary of consultation responses to the updated Environmental Report	Response
<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>English Heritage, the Environment Agency and EDF Energy considered that the updated Environmental Report provides a much more rigorous approach to the analysis. Other respondents including, for example, the Royal Town Planning Institute agreed that the assessment was a considerable improvement.</p>	<p>The Government welcomes the comments on the updated Environmental Report and notes that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence, to update and build on the earlier assessments have been an important contribution to</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Natural England and the Town and Country Planning Association felt that there was not adequate consideration of Draft Regional Spatial Strategy policies in the assessment.</p> <p>Somerset County Council reiterated particular concerns raised in response to the first consultation, namely:</p> <ul style="list-style-type: none"> - the need for Regional Planning Guidance note 10 to be looked at in its 	<p>making the final decision on the Plan to Revoke the South West Regional Strategy.</p> <p>The emerging Regional Spatial Strategy for the South West was not adopted and therefore does not form part of the statutory development plan. It was therefore not considered as part of the Regional Strategy assessed by the Strategic Environmental Assessment for the purposes of revocation. Notwithstanding, given that some local authority plans in the South West have taken account of policies within the emerging Draft Regional Spatial Strategy, the assessment has also considered, where appropriate, the policies that comprised the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008).</p> <p>In accordance with the requirements of the Strategic Environmental Assessment Directive, the updated Environmental Report has given consideration to the secondary, cumulative and</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>entirety, and that its environmental policies work alongside the development strategy in an integrated way; and.</p> <ul style="list-style-type: none"> - no use has been made of the Annual Monitoring Reports in Regional Planning Guidance note 10 when assessing environmental effects of implementing those policies against the effects of removing them. <p>North Somerset Council also felt that the assessment had not adequately considered cumulative effects.</p> <p>North Somerset Council felt that there should be an assessment of how effective mitigation can be or whether it can be enhanced. The Council also considered that some text is contradictory and in particular Appendix E, paragraph 4.7.1 which</p>	<p>synergistic effects of the Plan to revoke to the South West Regional Strategy on the region and in conjunction with other regional plans. A summary of these effects is presented in Table 4.5 of the updated Environmental Report against each of the Strategic Environmental Assessment topics.</p> <p>In respect of the use of Annual Monitoring Reports of Regional Planning Guidance note 10, in most cases it was not considered appropriate to use this information in its entirety as these reports contain some outdated data (the latest Annual Monitoring Report covered the period April 2008 to March 2009).</p> <p>It is not clear how the effectiveness of mitigation identified in the updated Environmental Report could be assessed or, further, increased as implied in this response.</p> <p>It is not considered that the text in Appendix E referred to in this response is contradictory. The assessment contained in Appendix D of the updated Environmental Report has identified the potential for negative effects on soils as</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>states that greenfield development will have a negative effect on soils but then goes on to say that all significant effects are positive and so no mitigation is proposed.</p> <p>North Somerset Council also raised concern with respect to the methodology used to assess the revocation of saved structure plan policies and, in respect of the Avon Structure Plan in particular, did not agree with the conclusion reached that there would be no gaps following revocation.</p>	<p>a result of development on greenfield land (whether the South West Regional Strategy is revoked or not). However, the adverse effects identified have not been assessed as significant and in consequence, no mitigation has been identified within the updated Environmental Report.</p> <p>Appendix B of the updated Environmental Report sets out the Government's assessment on whether or not the saved structure plans remained valid and are not superseded, taking account of legal and policy developments. Where the Appendix B assessment identifies saved structure plan policies as still relevant, the environmental implications of their revocation when proposed needs to be included in the overall assessment of the revocation of the Regional Strategies. The Government considered that only one saved structure plan policy - Policy 6 of the Somerset and Exmoor Joint Structure Plan Review (1991-2011) – was still relevant, and has decided to save it until an up-to-date local plan is adopted by Mendip District Council. The Government does not share the assessment that there are</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>The Countryside Council for Wales considered that a Habitats Regulations Assessment should have been undertaken.</p> <p>A number of consultees expressed concern in respect of reliance on the National Planning Policy</p>	<p>policy gaps if the Avon Structure Plan is revoked</p> <p>It is the Government's view that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive. This conclusion was reached on the basis of a screening exercise, and was supported by the findings of the Strategic Environmental Assessment. The Strategic Environmental Assessment assessed the likely effects of the revocation of the Regional Strategy, and the likely effects of retaining the Strategy (and a number of reasonable alternatives involving partial revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which include biodiversity, fauna and flora). No significant negative effects on biodiversity were found, nor were any significant negative effects found from reasonable alternatives.</p> <p>The reliance on the National Planning Policy Framework and duty to co-operate is considered as an individual</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	Framework and duty to co-operate to address strategic planning issues.	issue below.
Additional information	The Countryside Council for Wales was concerned that the baseline includes no reference to International Sites shared in 'common' with Wales.	Annex G of the updated Environmental Report lists those sites that have the highest environmental protection in the South West. This list includes the Severn Estuary Special Area of Conservation/ Special Protection Area and Ramsar site. In addition, the national baseline for each topic in Appendix E covered the existing situation in England, but also Wales and Scotland.
Likely significant effects	The Town and Country Planning Association questioned whether the assessment had adequately considered impacts on gypsy and traveller provision, which was previously covered in the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes.	The assessment considered, where appropriate, the policies that comprised the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) including in respect of provision for gypsies and travellers. The assessment identifies that 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 Regional Planning Guidance note 10 combined with a targeted requirement within the draft revised

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Both the Town and Country Planning Association and Dorset County Council raised concerns in respect of the assessment of potential differences in the location of new development and risk of greater dispersal and development on greenfield land as a result of revocation.</p>	<p>Regional Spatial Strategy. It is the Government's view that local authorities are best placed to understand the needs of their communities. Planning policy for traveller sites, published in March 2012, makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community. Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.</p> <p>The updated Environmental Report identifies 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 locational policies as only 7 local planning authorities in the region do not currently have a local plan adopted shortly before or after the</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Campaign to Protect Rural England shares the view reached in Section 4.5 of the updated Environmental Report about secondary cumulative and synergistic effects, and is concerned that increasing development pressures in regions such as the South West will increase environmental and landscape challenges, whilst undermining regeneration in urban areas in other parts of the country. It questioned why the assessment identified significant benefits across all Strategic Environmental Assessment natural and built environment topic areas where one would expect pressures to</p>	<p>publication of Regional Planning Guidance note 10 or an adopted core strategy. 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. However, the National Planning Policy Framework seeks to deliver sustainable development.</p> <p>The findings presented in the updated Environmental Report indicate that revocation is unlikely to affect local authorities' provision and planning for the environment. Further, significant positive effects are expected across many of the Strategic Environmental Assessment topics as a result of the implementation of a combination of existing statutory environmental protection and the application of the National Planning Policy Framework. However, Section 4.2 of the updated Environmental Report does identify the potential for adverse effects across several Strategic Environmental Assessment topics, particularly arising</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>emerge.</p> <p>Somerset County Council expressed concerns about the apparent contradictions in the analysis presented in Appendix D of the updated Environmental Report with some sections stating there was not sufficient coverage of Local Plans in the South West from which to assess the effects of revocation whilst others stated that most Local Plans have been in place since the publication of Regional Planning Guidance note 10.</p>	<p>from new housing and economic development, although these effects would be similar to those if policies on housing and economic development contained within Regional Planning Guidance note 10 were retained. This reflects the fact that revocation will not affect local authorities planning for growth and providing for these needs.</p> <p>The commentary in Appendix D to the updated Environmental Report highlights that, as Regional Planning Guidance note 10 Policy SS6 and SS7 are not spatially specific AND there is not complete coverage of local plans prepared in conformity with Regional Planning Guidance note 10, effects on some topics under retention are uncertain. Under revocation, this uncertainty is likely to remain as the future approach to the distribution of development in the region is unknown until updated plans are in place.</p>
<p>Reliance on the National Planning Policy Framework and the duty to co-operate</p>	<p>Some respondents (the Royal Town Planning Institute, Campaign to Protect Rural England, Town and Country Planning Association, RenewableUK, Dorset</p>	<p>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</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>County Council and the Countryside Council for Wales) thought that it was unlikely that the National Planning Policy Framework and duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government (and national) boundaries and across issues such as the natural environment and climate change.</p> <p>The Environment Agency and RenewableUK suggested that advice should be provided to local authorities and other partners to assist cross boundary planning under the duty to co-operate.</p>	<p>independent examination. In addition, the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The National Planning Policy Framework 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.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the duty to co-operate should be one of the priority areas on which the Government should consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and were published on 21 December 2012 for an 8 week consultation. The Government is considering the approximately 400 consultation responses before responding to both the Review and the consultation.</p>
Monitoring	Dorset County Council, the Town and Country	The measures that are to be taken to monitor the significant environmental

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Planning Association, RenewableUK, English Heritage and Campaign to Protect Rural England provided comments on the proposals for monitoring contained within the updated Environmental Report.</p>	<p>effects of the implementation of the Plan to Revoke the South West Regional Strategy are contained in this Post Adoption Statement (Chapter 6 and Annex C).</p>
<p>Individual topics</p>	<p>Respondents raised a number of questions about individual topics. In particular, some respondents thought that the impact of the revocation of the South West Regional Strategy could impact on climate change and renewable energy deployment.</p>	<p>It will be for local planning authorities to determine local responses to the issue of renewable energy generation consistent with the objectively assessed and up to date needs of their communities, following the guidance on such issues set out in the National Planning Policy Framework.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012). Collectively the legislation and planning policy provides the framework for</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>RenewableUK considered that Regional Planning Guidance note 10 Policy RE6 (Energy Generation and Use) should be updated and retained to deliver the benefits arising from renewable energy deployment and climate change mitigation.</p>	<p>Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>Whilst revocation of the Regional Strategy removes a number of quantitative policies contained within Regional Planning Guidance 10, most 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.</p> <p>Regional Planning Guidance note 10 Policy RE6 is outdated. Further, 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.</p>

Campaign to Protect Rural England concluded that they did not see any reason not to rapidly revoke the South West Regional Strategy, despite

concerns raised in respect of the approach to the assessment of its revocation. The Environment Agency also welcomed the assessment's consideration of the National Planning Policy Framework and duty to co-operate and was of the view that with effective co-operation amongst authorities, environmental issues of wider concern can be addressed without the Regional Strategy.

In light of the findings of the assessment as reported in the updated Environmental Report, the comments received from consultees and the framework for environmental protection and planning that is in place, the Government is content that environmental considerations have been adequately incorporated into the Plan to Revoke the Regional Strategy. As explained in Chapter 5 below, where significant effects and/or uncertainty have been identified, a programme of monitoring has been proposed to enable future consideration of whether any further mitigation or intervention is needed.

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

5.1 Policy background

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

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

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

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

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

- the planning system should be genuinely plan-led and support sustainable economic growth, proactively driving the homes and jobs that we need.
- local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites.

- in line with the presumption in favour of sustainable development, local councils should approve development that accords with the local plan. Where that plan is out of date, councils must grant planning permission for development that is sustainable without delay.
- local councils must plan in their local plans for strategic development, reflecting the strategic priorities set out at paragraph 156 of the Framework.

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

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

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

The Government's planning reforms also include a package of incentives to encourage growth. These include the New Homes Bonus which rewards communities for each new home built; the Community Infrastructure Levy which enables councils to levy money on new development; and the Business Rates Retention which allows authorities to directly profit from business rates raised in their area.

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

5.2 The Reasonable Alternatives

The initial Environmental Report on the proposed revocation of the South West Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the Regional Strategy entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F to the updated Environmental Report) including partial revocation. In considering these responses and following the application of Article 5(1) of the Strategic Environmental Assessment Directive, the following alternatives to the Plan to Revoke were taken forward for the updated assessment within the updated Strategic Environmental Assessment:

- 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.

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

The Government has carefully considered each of the reasonable alternatives and the environmental effects assessed in relation to those reasonable alternatives, set out in the updated Environmental Report⁵. In doing this, the Government has taken account of the consultation responses to both the initial and the updated Environmental Reports. The Government welcomes the comments on both of those reports and notes that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union

⁵ Strategic Environmental Assessment of the Revocation of the South West Regional Strategy: AMEC Environment & Infrastructure UK Limited: November 2012

jurisprudence to update and build on the earlier assessments, have been an important contribution to making the final decision on the Plan to Revoke the South West Regional Strategy. The summary of consultation responses set out in this report show that consultees welcomed the rigorous approach to assessment of environmental effects.

Two respondents considered that the updated Environmental Report should have included an assessment of the draft revised Regional Spatial Strategy. The Government disagrees with this view. The emerging Regional Spatial Strategy was not adopted and therefore does not form part of the statutory development plan. It was therefore not considered as part of the Regional Strategy assessed by the Strategic Environmental Assessment for the purposes of revocation. However, given that some local authority plans in the South West have taken account of policies within the draft revised Regional Spatial Strategy, the assessment has also considered, where appropriate, the policies that comprised the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008). The Government considers that all these issues have been dealt with rigorously in the updated Environmental Report. In spite of the more rigorous approach, a further four respondents expressed some concern with some aspects of how the Strategic Environmental Assessment process was carried out. The Government disagrees with this view. As detailed in this Post Adoption Statement (including at **Table 3.2** and **Annex B**), the Government considers that these have been adequately covered in the updated Environmental Report, including the assessment at Section 4 of the updated Report.

One respondent considered that there should have been a full Habitats Regulations Assessment of the Plan to revoke the Regional Strategy for the South West, and expressed concern that the potential for any adverse effects on certain European designated sites, including within Wales, could not be addressed by individual competent authorities. As detailed in **Annex B** to this Post Adoption Statement, the Government disagrees with this view. It reached its conclusion that a full Habitats Regulations Assessment was not required on the basis of a screening exercise. Additionally, the assessment contained in the updated Environmental Report was informed by baseline information that included consideration of designated European sites within Wales such as the Severn Estuary Special Area of Conservation/Special Protection Area and Ramsar site. It considered the effects of revoking the South West Regional Strategy on biodiversity which included the potential for adverse impacts on European designated sites and found that there would be no significant effects as a result of revocation. The Government considers that there are legislative and policy protections for European designated sites in the absence of the Regional Strategy.

Two respondents expressed concern that the loss of the Regional Strategy would lead to increased development on greenfield land due to the removal of both the specific brownfield target contained within Regional Policy Guidance note 10 and overarching policies steering development to Principal Urban Areas. Other respondents also raised concerns in respect of the differences in

the location of new development as a result of revocation. As detailed in this Post Adoption Statement (including at **Table 3.2** and **Annex B**), the Government considers that these have been adequately covered in the updated Environmental Report, including in Section 4 and Appendix D. The National Planning Policy Framework includes, as part of the core land-use planning principles, that planning should:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;
- 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; and
- 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.

This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, seek to ensure that housing development is located in a way that is consistent with the principles of sustainable development. Additionally, as highlighted in the updated Environmental Report, the majority of local plans within the South West region have been adopted since Regional Planning Guidance note 10 was published and 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 Regional Strategy. It is also expected that working across local authority boundaries to co-ordinate strategic priorities will take place under the duty to co-operate and through the operation of the six Local Enterprise Partnerships in the region. The result is that the broad spatial strategy identified in Regional Planning Guidance note 10 (i.e. focusing the majority of development within the region's Principal Urban Areas) is likely to continue.

Some respondents thought it unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries. One respondent also raised particular concern about the relationship between England and Wales, especially when dealing with sites of shared responsibility. The Government disagrees with this view in light of the policies on strategic planning set out in the National Planning Policy Framework and the fact that councils that have not complied with the duty may fail the local plan independent examination. In addition, as explained in the updated Environmental Report, the majority of local plans within the region have been adopted since Regional Policy Guidance note 10 was published and 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 to Revoke. The Government also notes that key environmental protections remain in place (which are set out in more detail in **Table 3.2** and **Annex B** of this Post Adoption Statement). The Government considers that all these issues have been dealt with rigorously in the updated Environmental Report. With specific regard to cross working across national boundaries, whilst the National Planning Policy Framework and duty to co-operate do not extend to neighbouring authorities in Wales, this is not an obstacle to any English authority working across national boundaries. Where local planning authorities have failed to co-operate on cross boundary matters, it is likely that their Local Plan will not be deliverable and as such it may be found unsound. There is also a tradition of collaborative planning between English local planning authorities and the local planning authorities of Wales. For example, guidance on local development plan preparation in Wales⁶ sets out a number of tests of soundness including that plans should have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas, including neighbouring authorities in England. Further, local plans (and land use plans of other local planning authorities in neighbouring countries) are also subject to Strategic Environmental Assessment and, where significant effects on European designated sites are likely, Habitats Regulations Assessment. Beyond the statutory planning systems, there are also initiatives and other non-land use plans including, for example, River Basin Management Plans that provide a vehicle for strategic planning across national boundaries.

Four respondents suggested additional monitoring measures. The proposals for monitoring, which take account of these responses, are set out in Chapter 6 and Annex C of this Post Adoption Statement. The Government will continue its ongoing dialogue with the Welsh Government to assess and monitor any potential impacts of the revocation of the Regional Strategy upon Wales. This will include working through the 5 Administrations Forum and directly with the Welsh Government to keep under review any potential impacts and to implement appropriate mitigation as necessary.

There were also some questions from some respondents on individual topics such as economic strategy, heritage, renewable energy and climate change, and the Green Belt. The Government considers that these issues have all been adequately addressed in the updated Environmental Report, mainly in Appendix D and Appendix E.

Finally, one respondent asked for Regional Planning Guidance note 10 policy on renewable energy to be retained to deliver Regional Strategy outcomes on renewable energy deployment and climate change mitigation. As detailed in this Post Adoption Statement (including at **Table 3.2** and **Annex B**), the Government considers that this has been adequately covered in the updated Environmental Report, including in the assessment at Section 4. Policy RE6 of Regional Planning Guidance note 10 is out-of-date and, collectively,

⁶ Local Development Plans Wales: Welsh Assembly Government: 2005

existing legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change. The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. It also contains a number of policies aimed at encouraging the development of renewable energy installations. Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.

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

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

(i) On the **retention** of the South West Regional Strategy but not updating it in the future, it was noted in the updated Environmental Report that there will be significant positive environmental effects, although these will be largely similar to those if the Regional Strategy were revoked. The only area where retention 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. The updated Environmental Report found that there would be no differences between the effects of retention and revocation. The retention of the Regional Strategy would mean that it would continue to form part of the development plans of local planning authorities and would therefore be a consideration in plan-making and decision taking but with policies and associated targets that are largely outdated and which have been superseded by national policy and other legislation, including the National Planning Policy Framework. Consequently, the Government considers that it would fail to promote a locally-led approach to planning and could create a potentially confusing position. In consequence, the Government does not consider that it should pursue this alternative.

(ii) On **partial revocation**, the updated Environmental Report noted that there was only one policy (Regional Planning Policy Guidance note 10 Policy HO1: Levels of Housing Development 1996-2016) where potential significant negative environmental effects were identified for the revocation of the

quantified and spatially specific policies. This related to material assets associated with resource use and waste generated by new housing development. However, this effect was also identified for retention of the Regional Strategy. The Government does not therefore consider that it should pursue this alternative, in particular given that retention of this policy will not remove the need for more houses within the region and in this regard one of the key planning principles set out in the National Planning Policy Framework is to proactively drive and support sustainable economic development to deliver the homes that the country needs. Furthermore, retention of this policy will fail to promote a locally-led approach to planning.

(iii) Specific effects for **retention for a transitional period of policies which set the quantum for development or which are spatially specific** were identified in the updated Environmental Report. These included potential significant positive effects from some policies on population and human health, biodiversity, soil, air, climatic factors, material assets and landscape. One policy (Policy HO1: Levels of Housing Development 1996-2016) was considered to have a significant negative effect 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 revocation of the Regional Strategy. The Environmental Report also noted that retention of these policies for a transitional period may result in some confusion with the intent of the National Planning Policy Framework and how they are to be applied. The Government does not therefore consider that it should pursue this alternative, in particular given that Regional Strategy policy is largely outdated, runs contrary to the National Planning Policy Framework and fails to promote a locally-led approach to planning. The updated Environmental Report also identified that 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.

(iv) **Regarding retention of policies, the revocation of which may lead to likely significant negative environmental effects**, the updated Environmental Report found that there are no policies in the Regional Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. Where there are potential significant negative effects on material assets associated with new housing and economic development, this is the same issue for retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the Regional Strategy.

Therefore in light of the policy background and reasons for the Plan to Revoke the South West Regional Strategy, consideration of the environmental effects of the Plan to Revoke and the reasonable alternatives, and consideration of responses to the Environmental Reports, the Government has decided to proceed with its preferred option to revoke the South West Regional Strategy.

The updated Environmental Report set out that the Government was proposing to revoke all remaining saved structure plan policies in the region, with the exception of policy 6 of the Somerset & Exmoor National Park Joint Structure Plan Alteration 1991 – 2011, which relates to the green belt between Bristol and Bath. It was noted that retention of this policy 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. One respondent supported retention of this policy until an up-to-date local plan was in place. No comments were received supporting the retention of other saved structure plan policies in the region. However, one respondent raised some concern over the methodology used to assess the revocation of saved structure plan policies. As explained in Table 4.2 and Annex B to this Post Adoption Statement, Appendix B of the updated Environmental Report sets out the Government’s assessment on whether or not the saved structure plans remained valid and are not superseded, taking account of legal and policy developments. Where the Appendix B assessment identifies saved structure plan policies as still relevant, the environmental implications of their revocation when proposed needs to be included in the overall assessment of the revocation of the Regional Strategies. The Government considered that only one saved structure plan policy - Policy 6 of the Somerset and Exmoor Joint Structure Plan Review (1991-2011) – was still relevant.

Taking account of the updated Environmental Report and responses to the consultation, the Government has decided to revoke all directions preserving structure plan policies in the region, except for the direction made in September 2007 in respect of the Somerset & Exmoor National Park Joint Structure Plan Alteration 1991 - 2011 so far as it preserves policy 6 (Bristol/Bath Green Belt).

The measures decided concerning monitoring

Monitoring of the effects of the Plan to Revoke the South West Regional Strategy will focus on:

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

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

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

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

ANNEX A

Consultation and Partner Engagement – Initial Environmental Report

Responses to scoping stage of the preparation of the Initial Environmental Report

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

Table A1 Summary of statutory body's responses at the Strategic Environmental Assessment scoping stage

No	General	Detailed comments	Raised by	Response
1.	Scope and Detail	The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation.	Environment Agency, Natural England, English Heritage	The updated Environmental Report has been produced consistent with the requirements of the Strategic Environmental Assessment Directive. Responses to the detailed points raised at scoping stage are set out in the rest of the Table.
2	Reliance on the duty to co-operate and the National Planning Policy Framework	The Environment Agency, Natural England and English Heritage questioned whether the reliance on the draft duty to co-operate was sufficient to capture and address cross-boundary issues or cumulative effects of multiple	Environment Agency, Natural England, English Heritage, Scottish Natural Heritage	Since the scoping report was prepared the Government has published the National Planning Policy Framework in March 2012 and commenced provisions in the Localism Act 2011 implementing the duty to co-operate.

No	General	Detailed comments	Raised by	Response
		<p>local authorities' local plans. Scottish Natural Heritage thought there should be consideration of the impacts on the protection and enhancement of networks to allow species dispersal throughout Britain.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework. Since the National Planning Policy Framework was still in its draft form, this needed to be more fully considered. It is also difficult to predict what local authorities will do post revocation of regional strategies so that the environmental effects of their revocation is more likely to be "uncertain" rather than positive.</p>		
3	Topics to be considered	The Environment Agency considered that the impacts on climate change, water quality and water resources should be fully assessed. The Water Framework Directive should be considered as well as strategic planning	Environment Agency	Appendix D of the updated Environmental Report published for consultation in November 2012 contains an assessment of the effects of retention and revocation of individual policies on climate change, water quality and water resources.

No	General	Detailed comments	Raised by	Response
		of water resources.		Appendix E of the updated Environmental Report reviews the baseline condition for each of the Strategic Environmental Assessment topics (including climatic factors and water) and assesses the likely effects on the baseline of retaining and revoking individual policies, the Regional Strategy as a whole and reasonable alternatives.
4	Water Quality	There are currently issues around accommodating growth within existing Waste Water Treatment Works consent limits, and without compromising Water Framework Directive requirements. This issue should be acknowledged in the assessment. The assessment could usefully inform the allocation of growth across catchments, which are likely to be wider than an individual local authority boundary. The assessment should also consider how strategic cross-boundary water quality issues will be dealt with following the revocation of the Regional Strategy.	Environment Agency	<p>In accordance with Annex 1(f) of the Strategic Environmental Assessment Directive water quality issues have been assessed. This assessment includes the consideration of the topics in Appendix E of the updated Environmental Report, as part of the assessment of the retention and revocation of individual policies, the overall assessment of the revocation of the South West Regional Strategy and reasonable alternatives.</p> <p>This analysis also takes account of how the duty to co-operate will underpin strategic cross-boundary planning by local planning authorities on issues such as water management.</p>

No	General	Detailed comments	Raised by	Response
5	Water resources	<p>The Environment Agency considered that the demand for water is dependent on the number of households, number of occupants and the per capita consumption of occupants. If the post Regional Strategy forecast housing numbers increase, even with the same population and thus lower occupancy, then per capita consumption of water is likely to be higher, resulting in a higher demand for water. Similarly, if the number of houses forecast remained the same and the per capita consumption of water increased, or occupancy increased, then this would also increase the demand for water.</p> <p>Change in water use will be influenced by the post Regional Strategy policies of individual local authorities. These effects may not be uniform for all local authorities. Therefore, the net effects on water resources of having a regional strategy or not could be zero, more or less. Increases in housing numbers could be considered against the</p>	Environment Agency	<p>Water resources have been assessed under the Strategic Environmental Assessment topic water in Chapter 3 of the updated Environmental Report. This includes the consideration of the topics in Appendix E of the report, as part of the assessment of the retention and revocation of individual policies and the overall assessment of the revocation of the South West Regional Strategy and reasonable alternatives. This also takes account of the strategic planning cross-boundary issues which the water companies' Water Resources Management Plans address. Further statutory requirements on water companies under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning are designed to ensure a sustainable supply of water over the next 25 years.</p>

No	General	Detailed comments	Raised by	Response
		<p>relevant water companies Water Resources Management Plan to ensure that the company is able to supply the additional households. The same applies to any redistribution of households within the existing overall housing numbers. Moving planned builds to another local authority area or within a local authority area may shift the demand into a different water company water resource zone. The effects of this on the company's ability to supply the 'additional' houses should be considered.</p>		
6	Waste	<p>Waste plans, required to meet the requirements of the Waste Framework Directive, will need a strong evidence base to support them. The South West study on commercial and industrial waste arisings was carried out within the Regional Strategy framework. The resulting data and Regional Strategy policies on construction and industrial waste were used by Waste Planning Authorities to determine the future need</p>	Environment Agency	<p>Paragraph 153 of the National Planning Policy Framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst the Planning and Compulsory Purchase Act 2004 provides for two or more local planning authorities to prepare joint local plans either through joint working under Section 28 or through the establishment of a joint committee under Section 29. This allows unitary authorities</p>

No	General	Detailed comments	Raised by	Response
		<p>and location for waste facilities. Upgraded and agreed evidence could be shared between local authorities at a strategic level, to ensure that facilities are built in the right location and potentially at the right scale.</p> <p>The Environment Agency noted that the local authorities in the South West are continuing to meet to discuss waste planning.</p> <p>The South West Regional Strategy provided clear direction on the management of the region's waste in. The agreed apportionment figures and related policy allowed waste planning authorities to plan and monitor consistently for the management of imported waste. Ways could be found to maintain this evidence base which local authorities rely on to address and monitor strategic waste issues. The assessment should consider the impact of the loss of regional waste data on waste planning authorities.</p>		<p>and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework including for the planning of waste infrastructure.</p> <p>The National Planning Policy Framework also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National Planning Policy Framework (paragraph 156) states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for</p>

No	General	Detailed comments	Raised by	Response
				waste and its ability to meet forecast demands. Further Planning Policy Statement 10 The Waste Planning Policy Statement will remain in place until the National Waste Management Plan is published. Appendix C of the updated Environmental Report illustrates the progress that local authorities have made in the South West to prepare Waste Management Plans.
7	Climate Change	<p>Climate risk and associated adaptation actions should be assessed to help ensure resilience to future climate change. Local authorities could put monitoring mechanisms in place, as action or inaction by one local authority could impact on neighbouring authorities. We suggest that possible mechanisms for monitoring resilience to climate change are considered within the assessment.</p> <p>The initial Environmental Report stated that local authorities may find it useful to draw on regional data including assessments of the potential for</p>	Environment Agency, Scottish Natural Heritage	<p>Climate change issues are assessed as part of the climatic factors Strategic Environmental Assessment topic in Chapter 3 of the updated Environmental Report and also set out in Appendix E. We have considered mechanisms for monitoring resilience to climate change and the proposals for monitoring, including for climatic factors (contained in Chapter 5 of the updated Environmental Report and confirmed in Annex C of this Post Adoption Statement).</p> <p>Data prepared at a regional level to inform the preparation of regional strategies is still available for local</p>

No	General	Detailed comments	Raised by	Response
		renewable and low carbon energy. This should be considered in greater detail at the next stage of the environmental assessment. Strategic issues need to be addressed		planning authorities to use, individually or collectively were they have decided to prepare joint local plans or development plan documents on strategic planning issues such as waste management, transport infrastructure or large scale housing development. Local planning authorities will also commission additional research when necessary on a variety of key planning issues including assessment of the potential for renewable and low carbon energy.
8	Growth	Assumptions on future growth, including for housing allocations, are important when making assessments of the potential impacts of revocation of the regional strategies. An assumption that lower levels of growth (than that proposed by the Regional Strategy) may be pursued by local authorities may lessen pressures on negative regional trends. It is possible that some local authorities may decide to increase their housing figures above Regional Strategy targets which could potentially	Environment Agency and English Heritage	<p>In order to better understand the content of local plans, the updated Environmental Report has taken into account local plan policies as illustrated in Appendix C on housing, pitches for gypsies and traveller sites, renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded and updated in the updated Environmental Report, including for heritage assets and river basin management plans.</p> <p>In the absence of the South West Regional Strategy, this does not mean</p>

No	General	Detailed comments	Raised by	Response
		<p>result in significant environmental effects.</p> <p>It may become more challenging to accommodate growth in certain river catchments - all available, up-to-date information should be utilised when carrying out the next stage of the assessment.</p>		<p>the end of a strategic approach to planning and development plan preparation. Strategic planning will be taken forward by local planning authorities, this represents a shift towards a locally-led approach to planning for cross-boundary matters in local plans. This approach to development will be more sensitive and responsive to the character of communities, including the habitats and the natural environment of localities.</p>
9	Marine Planning	<p>The South West Regional Strategy was adopted before the marine planning process started. It therefore did not account for the role that marine planning can play, not just within the marine environment, but also on land. Many of the South West Regional Strategy Sustainability Appraisal objectives could be compared to the aims of the marine planning process. It was suggested that the Marine Management Organisation (MMO) be consulted at all stages of the</p>	Environment Agency	<p>The consultation on the Environmental Reports is a public one and comments from all parties with an interest are welcome. The initial Environmental Report published in October 2011 and the updated Environmental Report published in November 2012 were sent to the MMO for comment.</p>

No	General	Detailed comments	Raised by	Response
		assessment, given that their plans could potentially apply to the areas covered by this environmental assessment.		
10	Cumulative Effects	The Environmental Report should effectively assess cumulative impacts and mitigation measures of many small adverse impacts on the environment for instance on climate change including greenhouse gas emissions.	Environment Agency	Cumulative impacts are taken into account in the assessment presented in the updated Environmental Reports. The approach to the analysis is set out in the methodology in Chapter 3, and a discussion of the impacts is included in Chapter 4. Mitigation measures are considered throughout the updated Environmental Report including for individual Strategic Environmental Assessment topics, and the retention and revocation of individual regional policies.
11	Regional Heritage Policies	English Heritage noted that some policies are only in regional strategies, not in local plans hence the risk of “policy gaps” if these regional policies are not saved. They questioned the assumption that local authorities will carry forward regional policies to secure the boundaries of Green Belts around	Environment Agency	The National Planning Policy Framework, published in March 2012, continues to provide protection for heritage assets and designated heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, which have a degree of significance

No	General	Detailed comments	Raised by	Response
		<p>historic settlements, and whether existing national heritage policies will be carried forward to the National Planning Policy Framework. They thought that regional heritage policies do not just repeat national policy, but include regionally specific detail. They asked for more material to be included in the historic environment baseline data.</p> <p>They considered that the revocation of the regional strategies will result in significant adverse effects which should be mitigated, in particular:</p> <ul style="list-style-type: none"> • The national/regional overview of the significance of historic assets (summarised in the Historic Environment policy) will be lost, although the National Planning Policy Framework could underline English Heritage's role in identifying historic character of more than local significance; and • The uncertainty in relation to housing numbers could result in 		<p>meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.</p> <p>The Government attaches great importance to Green Belts and has maintained strong protection for them in the National Planning Policy Framework. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special</p>

No	General	Detailed comments	Raised by	Response
		<p>planning by appeal, which is more likely to be harmful to historic environment interests. Transitional arrangements should be considered.</p> <p>Many of the sub-regional policies identify sensitive the historic environments of settlements and their regeneration needs. The loss of such references will affect the extent to which these issues are clearly flagged for local plan preparation work. It is vital that the Planning Policy Statement 5 advice on understanding place and the positive contribution of heritage to regeneration is retained in the National Planning Policy Framework.</p>		<p>circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances. A change to a Green Belt boundary would need to take place through the local plan process, which would involve public consultation and an independent examination. At that</p>

No	General	Detailed comments	Raised by	Response
				<p>time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included.</p> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial</p>

No	General	Detailed comments	Raised by	Response
				use of the Green Belt.

Representations received in response to the initial public consultation on the proposed revocation of the South West Regional Strategy

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

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

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

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

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

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	The overall approach taken to Strategic Environmental Assessment	The Environment Agency supported the broad approach to the analysis presented in the Environmental Reports published in October 2011. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment did not apply. English Heritage did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the South West Regional Strategy on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.	Environment Agency, Natural England and English Heritage.	The impact of retaining, partially revoking and fully revoking the South West Regional Strategy has been assessed in detail in the updated Environmental Report in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This includes an assessment of cultural heritage – including architectural and archaeological heritage.
2	The overall approach taken to Strategic	The consultation on the assessment of the revocation of regional strategies which ran from October 2011 was contrary to the requirements of Article 6(5) of the Directive.	Clyde and Co LLP and Icen Projects.	The Government disagrees that the consultation process undertaken in October 2011 was contrary to the requirements of Article 6(5) of the Directive which states that

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	Environmental Assessment			<p>the “detailed arrangements for the information and consultation of the authorities and the public shall be determined by Member States”. This requirement is transposed into English law by regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The initial Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of consultation responses, demonstrates the Government’s desire to consult fully on the assessment of the impacts of revocation of the Regional Strategy.</p> <p>Chapter 1 of the updated Environmental Report sets out the purpose of the consultation and sets out a number of questions on which the Government sought responses.</p>
3	The overall approach taken to Strategic	The environmental assessment had been carried out too late in the process, and should have been conducted prior to the initial decisions to revoke the regional	RenewableUK, Royal Society for the Protection of	The Government signalled its proposed intention to remove the regional tier of Government and return decision making on housing and planning to local authorities in

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

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				deciding whether or not to revoke the regional strategies.
4	The overall approach taken to Strategic Environmental Assessment	The Town and Country Planning Association were concerned that the initial Environmental Reports did not represent an analytically robust and rigorous assessment of the likely impacts or how they may be mitigated. They considered that not all of the Directive's provisions had been addressed with sufficient robustness to provide an appropriate means of assessment, with, for example, reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The initial Environmental Reports did not explore the potential short-term impacts that could arise in the interim period while the Regional Strategy is revoked, but before adopted local plans are in place. The reports do not project what the future might be like under local plans prepared with a minimum of national guidelines. The reports should contain more analysis of minerals and waste, infrastructure, town centre development, new settlements and major urban expansions.	Town and Country Planning Association.	The October 2011 Environmental Report was structured around the individual requirements of the Strategic Environmental Assessment Directive. Chapter 1 of the updated Environmental Report sets out which parts of the report address the requirements of the Directive.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
5	Assessment – likelihood of effects	The assessment had placed unquestioning faith in the environmental benefits of the Government’s planning reforms, and seemed to be a justification for revocation rather than objective analysis. The assumptions within the initial Environmental Report that revocation of the Regional Strategy will have no significant adverse environmental effects were untested and unsupported by evidence.	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental Planning.	The short, medium and long term impacts of retaining, partially revoking and revoking the South West Regional Strategy have been assessed in detail in the updated Environmental Report for each of the 12 Strategic Environmental Assessment topics.
6	Assessment – cumulative impacts	The Environmental Report should assess the cumulative effects of revocation, in particular the consequent capacity for ‘linked or cumulative, synergistic or secondary effects’ coupled with the need for environmental assessment to adapt to the scale and nature of the plan in question. The assessment should include a consideration of the impact of the revocation of all the Regional Strategies.	Clyde and Co LLP; Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental Planning.	Chapter 3 of the updated Environmental Report sets out the assessment methodology for cumulative, synergistic or secondary effects. Chapter 4 contains a consideration of these effects.
7	Assessment - mitigation	No mitigation measures are presented in the initial Environmental Reports because no impacts have been identified. Explanation and evidence should be presented to support statements in the report that ‘These policies could be delivered by other means than through a	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental	Appropriate mitigation measures are proposed in Chapter 4 of the updated Environmental Report, as well as in Appendix D.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		Regional Strategy.’ However, no evidence had been provided to show that this would actually take place.	Planning, Somerset County Council, Council for the Protection of Rural England.	
8	Assessment – strategic planning	<p>The Regional Strategies provided strategic policies to ensure that development can be planned in a way that is compatible with biodiversity targets. There are similar issues with water supply/demand, for example, under the Water Framework Directive, to ensure that housing development will be compatible with the requirements for favourable status and there are knock on implications for European protected sites.</p> <p>The Town and Country Planning Association considered that the Environmental Reports understated the benefits of regional policy which all the original Strategic Environmental Assessments had identified. They also considered that there was insufficient detail</p>	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Town and Country Planning Association.	The National Planning Policy Framework, published in March 2012, states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		to show how the new planning reform measures would deal effectively with strategic spatial issues.		The impact of retaining, partially revoking and revoking the South West Regional Strategy has been assessed in detail in the updated Environmental Report in the short, medium and long term for each of the 12 Strategic Environmental Assessment topics.
9	Assessment - baseline data	Statutory Agencies identified more recent environmental data than that used in the Environmental Reports - such as data used to inform the preparation of the River Basin Management Plans, and on climate change and sea level rise. Other respondents asked for other baseline data to be updated, for data on human health to be included and for data to better reflect the economic climate. Some respondents asked for maps to be included to better illustrate spatial impacts.	Natural England, Environment Agency, Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Clyde and Co LLP, Town and Country Planning Association.	The baseline data has been updated and expanded in the updated Environmental Report, and described for the 12 Strategic Environmental Assessment topics in Annex E. Maps have been included. This data has been used to inform the assessment of the strategic environmental impacts of the revocation of the South West Regional Strategy and a number of alternatives.
10	Assessment – material assets	The analysis of material assets could include the full range of infrastructure, employment sites, waste, energy and water	Levett-Therivel, Treweek	The updated Environmental Report includes an assessment of all 12 Strategic Environmental Assessment topics. This

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		use etc.	Environmental Consultants, Collingwood Environmental Planning.	incorporates assessment of waste and minerals, energy, water use, and employment land.
11	Assessment – likely evolution of the environment	The likely evolution of the environment in the absence of the plan should be set out.	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	In compliance with Annex 1(b) of the Strategic Environmental Assessment Directive, the updated Environmental Report presents for each of the 12 Strategic Environmental Assessment topics, an assessment of the likely evolution of the baseline without implementation of the plan or programme. Uniquely (to date) in this case, “without implementation of the proposed plan or programme” actually refers to the plan to revoke the Regional Strategy. So the evolution of the environmental baseline without the plan will mean in this instance, the evolution of the baseline with the retention of the existing Regional Strategy on place. Therefore, and where appropriate in addition to using projections, the assessments have used the findings of the relevant sustainability appraisal and appropriate assessment to help provide an informed understanding of the likely future evolution of the baseline. This information is

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				contained in Appendix E and presented within each topic chapter.
12	Assessment – Special Protection Areas and Special Areas of Conservations	Information on the existing impacts on Special Protection Areas and Special Areas of Conservations should be provided.	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental Planning.	The updated Environmental Report contains an Appendix G listing all Special Protection Areas and Special Areas of Conservation and the impact on particular sites has been drawn out where relevant.
13	Assessment – method statement	Information should be provided on who has carried out the assessments, details of the consultation with statutory agencies, responses to scoping responses and what problems were faced.	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental Planning.	Detail of the preparation of the report, consultation with the statutory agencies, responses to scoping comments, and difficulties faced with the analysis are set out in Chapters 1 and 3 and Appendix F of the updated Environmental Report.
14	Assessment – non technical summary	The non- technical summaries are not consistent with the Strategic Environmental Assessment Directive requirements. They are generic and make assertions that are not based on evidence.	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental Planning.	A non-technical summary which is based on the findings of the assessment and consistent with the requirements of the Strategic Environmental Assessment Directive is included in the updated Environmental Report.
15	Assessment –	Campaign to Protect Rural England	The Woodland	The Government agrees that Local Plans

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	local plans	<p>stated that the reports should have considered appropriate evidence that currently exist, such as changes to Core Strategies made subsequent to the announcement that regional plans would be abolished. They suggested that no such assessment had been made. As a result there were no recommendations about how the plan making process might be improved to address environmental issues, for example, by strengthening the Sustainability Appraisal process at local authority level.</p> <p>Friends of the Earth were concerned that the statement in the initial Environmental Reports that local authorities would deal with environmental issues was not based on a full analysis of whether local plans do have strong local environmental policies in place similar to those in the Regional Strategies in a situation where they were specifically not supposed to duplicate regional policy; or in areas where there are no local plans. In addition, the assumption that there are 'strong protections' for the environment in national planning policy had been disputed by several Non Government</p>	<p>Trust, Friends of the Earth , Campaign to Protect Rural England, Professor Alan Townsend, English Heritage.</p>	<p>are subject, and will continue to be subject, to Strategic Environmental Assessment consistent with the requirements of the Strategic Environmental Assessment Directive.</p> <p>Local authorities' planning policies and decisions must reflect, and where appropriate promote, relevant EU obligations and statutory requirements including on the environment.</p> <p>The updated Environmental Report includes an analysis of the content of local plans at Appendix C, focussing on housing allocation, gypsies and traveller pitches, renewable energy, employment land, minerals and waste.</p>

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		<p>Organisations.</p> <p>Professor Alan Townsend considered the reference in the reports that the removal of the Regional Strategies would create 'opportunities for securing environmental benefits' to be unfounded. Referring to the North East, as an example, he commented that the experience of Campaign to Protect Rural England was that economic and commercial pressures would act as a serious threat to a balanced approach to the environment and to development. He also referred to paragraph 1.25 in the initial Environmental Report where it is stated that environmental effects cannot be predicted for certain because they depend on local decisions, but disagreed with the view that decisions taken locally will look to maximise positive environmental outcomes for the local area.</p> <p>English Heritage said the initial Environmental Report fails 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. It therefore does not</p>		

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		consider the impact on it of the revocation of the South West Regional Strategy.		
16	Assessment – reasonable alternatives	<p>The environmental assessment had considered too narrow a range of alternatives. The only alternative considered was no revocation. This in turn means that there are no clear recommendations to address the practical question of whether the proposed planning system, centred on the National Planning Policy Framework and local plans, should be modified to address environmental issues that arise from the abolition of regional planning.</p> <p>Other alternatives suggested were:</p> <ul style="list-style-type: none"> • 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 	<p>Royal Society for the Protection of Birds, Wildlife and Countryside Link, Campaign for the Protection of Rural England, Renewable UK, Clyde and Co LLP, Irish Travellers Movement in Britain; Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental</p>	<p>The updated Environmental Report draws on the consultation responses and the findings of the assessment to develop a number of alternatives and identifies three reasonable alternatives to complete revocation for assessment.</p>

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		<p>plans more acceptable, as well as the possibility of local authorities producing joint development plans to cover specific issues;</p> <ul style="list-style-type: none"> • revoking certain chapters or parts of the strategies and introducing transitional arrangements. 	Planning.	
17	Assessment - monitoring	<p>Natural England, Campaign to Protect Rural England and the Town and Country Planning Association considered that it was not clear whether the local authorities, Government or any other body would collate the authorities' monitoring information and assess it to determine where more than local gaps in policy or problem areas were arising.</p> <p>The Town and Country Planning Association suggested that there was a need to monitor the general impact of the Government's planning changes. Consistent and effective monitoring on the effects of the 'duty to co-operate' over the next 2-3 years was particularly important, for example, by tracking local plan progress on local authority websites in a systematic</p>	<p>Natural England, Campaign to Protect Rural England, Town and Country Planning Association, Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Clyde and Co LLP, Forestry</p>	<p>Proposals for monitoring are set out in Chapter 5 of the updated Environmental Report.</p>

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		<p>but simple way.</p> <p>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning suggested that the effects of revocation should be monitored, for example, to track housing completions and development on Green Belt.</p> <p>Clyde and Co LLP considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p> <p>The Forestry Commission commented that the monitoring and sharing of information was far easier with the Monitoring Group established by the Regional Assembly. Local authorities were unlikely to monitor if this is not a requirement given funding constraints. The Annual Monitoring report was extremely valuable for seeing what was being achieved, and believed that it was unclear now how national targets for carbon reduction could be met. Whilst Local authorities may be responsible for</p>	<p>Commission, Dorset County Council, Somerset County Council.</p>	

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		<p>monitoring: they asked who they reported to and how (a) cumulative effects or (b) actions in one authority being undermined in another could be assessed.</p> <p>Dorset County Council did not consider that it was possible to monitor the environmental impact of the revocation meaningfully because without a regional planning or coordinating body this function would be undertaken by a multitude of agencies and local authorities.</p> <p>Somerset County Council stated that the Environmental Report should have used data from Annual Monitoring Reviews (AMRs) produced by authorities in the region to analyse the effects of revoking specific Regional Strategy policies for example transport and the coverage of the environmental impacts of revoking Saved Structure Plan policies in the South West region was rudimentary.</p>		
18	Reliance on the draft National	Natural England, the Environment Agency, the Town and Country Planning Association and Campaign to Protect	Natural England, Environment	The National Planning Policy Framework was published in March 2012. The National Planning Policy Framework is consistent

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	<p>Planning Policy Framework</p>	<p>Rural England noted that it was difficult to come to a view on the significance of the environmental effects of revocation, prior to the publication of the final National Planning Policy Framework and the implementation of the new “duty to co-operate”. Campaign to Protect Rural England for example, commented that as a result of the wider changes in planning it was inherently difficult to assess the likely impact of the revocation of Regional Strategies. In particular, the content of the final National Planning Policy Framework and future local plans were uncertain and neither of these statements could currently be fully tested. They expressed concern that the initial Environmental Reports did not give a comprehensive overview of the potential environmental impact of the Government’s intentions.</p> <p>Levett- Therivel, Treweek Environmental Consultants, and Collingwood Environmental Planning questioned the evidence that the National Planning Policy Framework will be so favourable to the environment or sustainable development, as the National Planning Policy Framework</p>	<p>Agency, Town and Country Planning Association, Campaign to Protect Rural England Levett- Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Dorset County Council, Strategic Land Use Partnership, Somerset County Council.</p>	<p>with the Government’s Natural Environment White paper, and makes it clear that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and sets out as a core planning principle that planning should recognise the intrinsic character and beauty of the countryside. The Framework also maintains protection for designated areas such as the Green Belt, Areas of Outstanding Natural Beauty, National Parks, and Sites of Special Scientific Interest. It sets out policy for the support of delivery of renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The National Planning Policy Framework is not subject to Strategic Environmental Assessment as it is high level policy and does not fall within the scope of the Strategic Environmental Assessment Directive.</p>

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		<p>has not been subject to Strategic Environmental Assessment.</p> <p>Natural England agreed with the assessment that there was an inherent difficulty in providing an assessment of the National Planning Policy Framework as an alternative, as it was not known how the final version would differ from the consultation draft.</p> <p>Scottish Power Renewables were of the view that the Regional Strategies have a key role in ensuring that national policy objectives are met and encouraged the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the regional plans do and could continue to play a key role in the strategic planning of onshore wind and the infrastructure to support the development of offshore wind. They were therefore concerned that the process for the revocation of Regional Strategies pre-empted the final National Planning Policy Framework and requested that the Government require local authorities to put</p>		

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		<p>in place policies to ensure a contribution to the national renewable energy targets, in line with the National Policy Statement.</p> <p>RenewableUK shared the concern about the reliance on the draft National Planning Policy Framework and were concerned that the draft National Planning Policy Framework did not contain a sufficient level of detail to support renewable energy planning.</p> <p>The Royal Society for the Protection of Birds and Wildlife Link considered it misleading for the initial Environmental Reports to imply that the planning reform would usher in new policies that, on balance, would make up for the loss of Regional Strategies. They considered, for example, that even though ‘top-down’ housing targets were being removed, the stated purpose of planning reform was to create more growth and to deliver more housing. There was no criticism of Regional Strategy housing figures being too high, only that they were ‘top-down’. It therefore followed that local authorities would use similar methodologies and arrive at similar</p>		

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		<p>figures when 'objectively assessing' housing need.</p> <p>Friends of the Earth stated that local authorities will have to be guided by the policies in the National Planning Policy Framework. Based on the draft National Planning Policy Framework text, in many cases, local authorities will struggle to take decisions on a 'local' basis to protect the environment. They stated that legal advice obtained by them showed that the concept of local decision-making was outweighed by the wording used in the draft National Planning Policy Framework which is directive on the need to approve development. They also pointed to shortcomings in the draft National Planning Policy Framework on sustainable development, countryside and biodiversity, transport, water, and climate change mitigation and adaptation.</p> <p>The Wildlife and Countryside Link were concerned that the initial Environmental Reports relied so heavily on the draft National Planning Policy Framework, which had not been finalised and was therefore</p>		

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		<p>subject to change.</p> <p>The Theatres Trust suggested that suitable policy within the National Planning Policy Framework and other measures needed to be in place to ensure the pooling of knowledge on physical and social cultural infrastructure, particularly theatres, if the plans are revoked.</p> <p>The Woodland Trust commented that the Strategic Environmental Assessment implies that the National Planning Policy Framework and planning reform in general will lead to less development, particularly in the absence ‘top down targets’, but felt this is contradictory to the Government’s policy, as the stated purpose of the current planning reforms is to encourage economic growth. Paragraph 1.6 of the initial Environmental Report states that the National Planning Policy Framework sits within the broader context of national policy and legislation such as the National Environment White Paper The draft National Planning Policy Framework did not however reflect the National Environment White Paper.</p>		

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		<p>Dorset County Council believed that the definition of sustainable development which should be contained in the National Planning Policy Framework should be strengthened, because in their opinion at present it favoured growth and housing development over the protection of the environment.</p> <p>Strategic Land Use Partnerships did not believe that the National Planning Policy Framework could replace the overarching strategic framework provided by the Regional Strategy and with its revocation it would leave a very serious and long term legacy of under-delivery and lower growth particularly devastating at the time when the reverse was required in the region.</p> <p>Somerset County Council stated that it was not clear how the emerging National Planning Policy Framework would afford the same level of environmental protection as the Regional Strategy and they also expressed concerns that the duty to co-operate would not be able to encourage</p>		

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

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		<p>backdrop of the Regional Strategy, a robust National Planning Policy Framework would need to ensure that any potential policy gaps were filled.</p> <p>The Royal Society for the Protection of Birds proposed that the Government should not revoke the Regional Strategies in full. They suggested that saving key environmental policies until they were replaced by equivalent local plan policies would significantly mitigate the risk of environmental harm. Saved policies should be kept in place during a transitional period while local plans were updated, which could easily coincide with the transitional period in which the National Planning Policy Framework was translated into local plans.</p> <p>The Wildlife and Countryside Link suggested that Government and its agencies should work together with local authorities and their partners in each region to identify which Regional Strategy policies should be saved, while local plans were updated to incorporate those policies.</p>		<p>environment, including landscape.</p> <p>The National Planning Policy Framework also makes clear that, where it would be appropriate and assist the process of preparing or amending Local Plans, Regional Strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of Regional Strategies to support their Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>Climate change is one of the core land use planning principles which the National Planning Policy Framework expects should underpin both plan-making and decision-taking. Local planning authorities are expected to adopt proactive strategies to mitigate climate change and co-operate to deliver strategic outcomes which include climate change. They should plan for new development in locations and ways which reduce greenhouse gas emissions (including through transport solutions which support</p>

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		<p>The Royal Society for the Protection of Birds, Dorset County Council and the Wildlife and Countryside Link considered that revocation would remove a raft of policies on issues, such as those on the natural environment and renewable energy, that were largely not contentious, and the product of close cooperation between local authorities and other interested parties.</p> <p>The Theatres Trust stated that the proposed revocation of the Regional Strategies could have adverse social effects. The Regional Strategies included measures for local authorities to work collaboratively ‘to increase investment in physical and social infrastructure’. This may not take place on such a scale, even with the duty to co-operate, if Regional Strategies are revoked. The Theatres Trust believes that this would have ensured that cultural facilities were in place for communities to share and that places exchange knowledge when creating new buildings or networks, so that resources were not squandered by the repetition of mistakes. Thus, it was suggested that measures needed to be in place to ensure</p>		<p>reductions in greenhouse gas emissions); actively support energy efficiency improvements to existing buildings; and promote energy from renewable and low carbon sources. These strategies are expected (paragraph 94 of the National Planning Policy Framework) to be in line with the objectives and provisions of the Climate Change Act 2008. There is a legal requirement on local planning authorities to ensure their Local Plan (taken as a whole) includes policies designed to tackle climate change and its impact. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.</p>

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		<p>the pooling of knowledge on physical and cultural infrastructure, which also affect theatres, if the Regional Strategy is revoked.</p> <p>RenewableUK were of the view that the revocation of the Regional Strategies would create a policy gap which would affect the ability of local authorities to make informed decisions. They did not believe that a reliance on national policy and the duty to co-operate was sufficient to ensure that the UK met its renewable energy generation and carbon emissions reduction targets.</p> <p>Friends of the Earth were concerned that the Strategic Environmental Assessments of the revocation of the Regional Strategies do not fully assess the environmental impacts of the incoherent policy context that would arise. They recommended that to fill the gap left by the Regional Strategies, local plans should absorb the regional evidence bases for renewable energy resources, and 'save' renewable energy target and adaptation policies where this would otherwise leave a gap in local frameworks. They added that the loss</p>		

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		<p>of the Regional Strategy left a gap in the consideration of the global impacts of a local authority's areas consumption/ indirect impacts. They were of the view that the footprint approach at a regional level specifically aimed to counter a strictly localist approach of local authorities. They were concerned that local authority plans would only consider local resource management and the whole footprint approach would be lost. They considered it essential that the evidence base section of the draft National Planning Policy Framework was revised to include the concept of foot printing to acknowledge the burden of resource use within a local authority on other areas. They therefore recommended that local authorities 'save' relevant policies where this would plug a gap in their existing local planning framework until the next appropriate review date; and Department of Communities and Local Government should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary co-operation.</p>		
20	Reliance on	Natural England and the Environment	Natural	The Government recognises the importance

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	<p>the duty to co-operate</p>	<p>Agency welcomed the emphasis given to cross boundary working which could potentially promote partnership working and offer a more strategic approach to spatial planning. However, both organisations commented that the Environmental Reports did not identify how the duty to co-operate would work in practice or replace the co-ordination provided by the regional strategies and the various working groups that existed within this structure. Natural England also considered that there was too much reliance on the assumption that local planning authorities would continue to work together on strategic issues under the duty to co-operate. It was noted that the duty would not apply to private sector companies who provide public services such as water and sewerage, energy and telecommunications, many of which would have a key role to play in infrastructure planning. The Environment Agency stated that common intelligence and joint working arrangements were needed between partner local authorities and other key organisations to develop an integrated approach to planning.</p>	<p>England, Environment Agency, English Heritage, Royal Society for the Protection of Birds, RenewableUK, Town and Country Planning Association, Friends of the Earth, Clyde and Co LLP, Professor Alan Townsend, CPRE. Countryside Council for Wales, Cadw (Welsh Historic Body), Dorset County</p>	<p>of strategic planning. The National Planning Policy Framework, published in March 2012, makes clear that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local</p>

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		<p>The Environment Agency referring to the duty to co-operate accepted that local authorities would work with adjacent councils, but not at a range of scales including a catchment scale. They considered that this was important as building development at the top of a catchment could increase run-off and cause flooding many miles downstream. They suggested that this is recognised so that the duty to co-operate could fully support strategic planning at a local level.</p> <p>Natural England accepted that it was possible that cross-boundary impacts may be assessed between adjoining authorities, but were unclear how the cumulative impacts of multiple authorities' plans would be assessed to take into account issues occurring within broader environmental boundaries, such as water catchments. Both the Environment Agency and Natural England sought further clarification on mechanisms which could be employed to ensure that likely cumulative, in-combination and cross-boundary environmental impacts, are identified,</p>	<p>Council, Strategic Land Use Partnership, Somerset County Council.</p>	<p>plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such they may be found unsound.</p> <p>As a further check, the Localism Act and</p>

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		<p>assessed and monitored as part of the Local Plan process and duty to co-operate.</p> <p>English Heritage noted how critical it was that the duty to co-operate was taken forward by local authorities and public bodies to ensure that the strategic planning issues are successfully addressed, based on a shared understanding of local needs and the wider context. However, they saw a danger that the wider perspective gained through strategic planning would be lost. They suggested that the National Planning Policy Framework and any guidance issued to support it; may assist with this by encouraging strategic analysis through sub-national partnerships in appropriate circumstances.</p> <p>While the Royal Society for the Protection of Birds welcomed the strengthening of the duty to co-operate during its Parliamentary passage, they remained sceptical that the duty would deliver contentious forms of development where it is needed or effective strategic planning for the natural environment. They were concerned by the unsubstantiated</p>		<p>local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The bodies, which are listed in local plan regulations, are:</p> <ul style="list-style-type: none"> • the Environment Agency; • the Historic Buildings and Monuments Commission for England; • Natural England; • the Mayor of London; • the Civil Aviation Authority;

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		<p>assumption that the duty to co-operate would overcome the strategic vacuum left by the revocation of the Regional Strategies. They stated, as an example, that there was no recognition of the shortcomings caused by having multiple plans being developed over multiple time and spatial scales, and the difficulties this would cause in terms of assessing the cumulative impacts of development.</p> <p>RenewableUK also expressed the view that the duty to co-operate provisions in the Localism Act appear weak, with no clear means of ensuring that local authorities would co-operate productively. They considered that a lack of strategic action on mitigation and adaptation to climate change was likely to result in significant and unpredictable effects on biodiversity, flora and fauna. Other elements, such as population, human health etc. would also be adversely affected.</p> <p>The Town and Country Planning Association indicated that it had made clear that the duty to co-operate had a range of significant limitations - having a</p>		<ul style="list-style-type: none"> • the Homes and Communities Agency; • Primary Care Trusts; • Marine Management Organisation; • Office for Rail Regulation; • the Highways Agency; • Transport for London; • Integrated Transport Authorities; and • Highway authorities. <p>The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the National Planning Policy Framework states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management,</p>

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		<p>narrow remit, a retrospective sanction and no defined or specific outcomes. They considered that even where joint cooperation was enthusiastically entered into by local authorities the nature of cooperation would be on a smaller spatial scale and with a tighter remit and much less resource than the statutory Regional Strategy process. They considered that this may lead to increased environmental impacts and may limit effective responses on renewable energy and catchment scale or coastal flood risk.</p> <p>Friends of the Earth considered that revocation would leave a gap in both planning policy on environmental issues and in a regional understanding of them. They considered that the duty to co-operate was unlikely to provide an effective response to the wider pattern of unsustainable pressures and growing regional inequalities in England. They suggested that the duty does not require co-operation on any specific issues. Issues which are by their nature spatial and cross-boundary, for example, river basin management, flood risk, green</p>		<p>water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

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		<p>infrastructure, and transport, would suffer from the removal of the Regional Strategy. While, for example, river basin management plans are developed by the Environment Agency, local authorities and others, the context for local decision-making on planning applications will still lack regional spatial awareness of the larger than local and cumulative impacts of decisions. This will lead in many cases to poor planning, and increased negative environmental impacts. They were concerned that there are no sanctions for local authorities who fail to co-operate, while local authorities who have failed to persuade neighbouring authorities to co-operate would suffer if the Inspector judged their plan to be unsound as a result.</p> <p>Clyde and Co LLP considered that it was not adequate to base the environmental assessment on the expectation that authorities would co-operate. It was therefore inappropriate for the assessment of likely effects, as encapsulated within the initial Environmental Reports, to be predicated on that basis.</p>		

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		<p>Another consultee (Professor Alan Townsend) suggested that a number of policy areas would be under threat from relying on the duty to co-operate, such as, climate change, river flooding, Areas of Outstanding Natural Beauty, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing.</p> <p>Countryside Council for Wales asked for reasonable alternatives should include keeping selected Regional Strategy environmental policies on matters crossing local authority boundaries, and which form framework for local plans. Impacts outside regions should be considered for example English developments requiring water supply from Wales is an ongoing issue. The duty to co-operate is likely to be inadequate to deal with effects remote from individual local authority areas. In general planning at local level only reduces effectiveness of Strategic Environmental Assessment and limits alternatives. The Habitats Directive: while revocation does not change legal protection, removing regional tier could adversely affect actual protection via</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>policies – HRA could perhaps be required.</p> <p>Cadw (Welsh Heritage Body) saw no impacts anticipated from revocation of West Midlands Regional Strategy.</p> <p>Dorset County Council wanted the duty to co-operate should set out strategic planning issues which local authorities and other bodies covered by the duty should agree to work on, so as to avoid inconsistency or conflict.</p> <p>Strategic Land Use Partnerships stated that the duty to co-operate may result in some cross boundary working between local authorities but any prospect of a wider more strategic regional consideration would disappear with the abolition of the Regional Strategy. The environmental, social and economic impacts of this would be severe and had been completely disregarded by the initial Environmental Report.</p>		
21	Individual Topics - Access to	Referring to the comment in the Environmental Reports that local authorities can continue to draw on available	Town and Country Planning	The National Planning Policy Framework, published in March 2012 makes it clear that local planning authorities may also continue

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	Data	information, including data from partners, to address cross-boundary issues, it was not clear whether data previously collated as part of the Regional Strategy preparation process would remain up-to-date, or whether coordinated monitoring mechanisms would continue to exist in the future	Association.	to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up -to-date, robust local evidence. The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.
22	Individual Topics -Green Belt	<p>JC Consultants considered that the Environmental Report misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p> <p>Campaign to Protect Rural England commented on the statement in the Environmental Report that “the revocation of top-down housing targets will remove pressure to review Green Belt to accommodate growth” and that it is now up</p>	JC Consultants, Campaign to Protect Rural England, Purbeck District Council, Dorset County Council	<p>The National Planning Policy Framework, published in March 2012, makes it clear that the Government attaches great importance to Green Belts, and overall that the planning system should recognise the intrinsic character and beauty of the countryside. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> (i) to check the unrestricted sprawl of large built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>to local authorities to review their Green Belt boundaries. They felt the assertion that the Green Belt would be 'safer', was debatable. They took the view that this was based on the National Planning Policy Framework making clear that a key objective of the planning system is to increase significantly the delivery of new homes; and therefore the tenor of wider Government policy (for example the New Homes Bonus) is that local authorities will be under greater pressure than before to provide new housing. Local authorities would therefore be obliged to "maintain a rolling supply of deliverable sites sufficient to provide five years worth of housingthe supply should include an additional allowance of at least 20%..." (draft National Planning Policy Framework, clause109).</p> <p>Purbeck District Council confirmed that there is no statutory saved policy for the South East Dorset Green Belt in Purbeck District.</p> <p>Dorset County Council stated that revocation would not remove development pressures on the Green Belt and that</p>		<p>countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The National Planning Policy Framework states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p>If proposing a new Green Belt, local planning authorities should: demonstrate why normal planning and development management</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		Green Belt reviews did not in themselves harm the environment.		<p>policies would not be adequate; set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; show what the consequences of the proposal would be for sustainable development; demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and show how the Green Belt would meet the other objectives of the National Planning Policy Framework .</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The National Planning Policy Framework also states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included.</p> <p>The National Planning Policy Framework makes clear, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>other harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the National Planning Policy Framework, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The National Planning Policy Framework also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the National Planning Policy Framework clearly state that when local planning authorities are ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, this is consistent with the policies set out in the National Planning Policy Framework,</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>including policies on the protection of Green Belts.</p> <p>In addition, the presumption in favour of sustainable development makes a clear reference to Green Belts when it lists policies in the National Planning Policy Framework that indicate that development should be restricted.</p>
23	Individual Topics - Gypsies and Travellers	<p>The Garden Court Chambers Gypsy & Traveller Team considered that the revocation of Regional Strategies would have a detrimental effect upon the provision of sites for Gypsies and Travellers. They considered that the view in the initial Environmental Reports that sufficient sites would be delivered by local authorities without regional or national supervision was misconceived. They were therefore disappointed that consideration had not been given to the alternative option of retaining those regional policies relating to the provision of sites for Gypsies and Travellers. Community Law Partnership supported these comments and added that</p>	<p>The Garden Court Chambers Gypsy & Traveller Team, Community Law Partnership, Friends, Families and Travellers, National Federation of Gypsy Liaison Groups.</p>	<p>It is the Government's view that local authorities are best placed to understand the needs of their communities. The Government has produced new planning policy for traveller sites that reflects this. The policy published in March 2012⁷ makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community.</p> <p>Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the</p>

⁷ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>revocation would lead to a decrease in the provision of new sites which would have an inevitable result in the numbers of Gypsies and Travellers on unauthorised encampments and unauthorised developments increasing. Friends, Families and Travellers also supported these comments and stated that they objected most strongly to the proposals to abolish Regional Strategies and, at the very least, considered that an option which retains a regional perspective should be retained for the provision of Gypsy and Traveller sites.</p> <p>The National Federation of Gypsy Liaison Groups also disagreed with the conclusions in the initial Environmental Reports that revocation was unlikely to have any significant environmental effect on human health, population, cultural heritage or the historic environment. The revocation of policies relating to the provision for Gypsies, Travellers and Travelling Showpeople, would have a significant impact as a direct result of the fact that without a regional framework, local authorities were likely to, and already were,</p>		<p>likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust evidence of need that will be tested at the Local Plan examination.</p> <p>This includes:</p> <ul style="list-style-type: none"> (i) identifying and updating annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets; (ii) identifying a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15; (iii) considering the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>including reduced pitch numbers in their Development Plan Documents. The resulting lack of suitable accommodation was directly related to poor health and lower life expectancy, difficulty in accessing education opportunities, which contributed to poor living conditions, for example, on unauthorised sites. Unauthorised sites also impacted on the environment, for example if they were not suitably located there could be local impacts on the landscape.</p>		<p>The duty to co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.</p> <p>The proposal to abolish Regional Strategies is part of a wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority councillors on their leadership role in site provision.</p>
24	<p>Individual Topics – Housing Supply</p>	<p>The Town and Country Planning Association referred to the statement in the Environmental Report that under the regional strategies the overall direction was expected to be a widening gap between housing provision in the strategy and the</p>	<p>Town and Country Planning Association, Campaign to Protect Rural</p>	<p>The National Planning Policy Framework, published in March 2012, and the Duty to Co-operate address this issue. The National Planning Policy Framework makes clear that local planning authorities should work collaboratively with other bodies to ensure</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>level of need. They considered that the assertion that local authorities planning for housing to reflect "the needs of their communities" would achieve this level was completely unsupported. The text asserts that "where drivers of growth are local, decisions should be made locally", but the new system failed to identify any mechanisms equivalent to the national growth areas or new growth points for accommodating in-migrants. They considered this to be a key issue in the region, the most economically buoyant in the country outside London.</p> <p>Campaign to Protect Rural England believed that the Government's continued policy of not allowing local authorities to include windfalls in their housing allowance (except in very prescribed circumstances) would, in practice, lead to an inevitable allocation of more greenfield sites.</p>	<p>England.</p>	<p>that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The National Planning Policy Framework states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>the plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The National Planning Policy Framework states that Local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>
25	Individual Topics -Waste	The Environment Agency commented that the assessment of waste policies was quite comprehensive, but they were	Environment Agency, Woodland	The National Planning Policy Framework was published in March 2012. Paragraph 153 of the framework makes clear the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>concerned with the second sentence in the last paragraph on page 61 which stated that, "local waste authorities already work together, and with other bodies, on strategic issues that cross local authority boundaries and may work together to produce joint waste plans if they wish". As waste plans are currently produced at county and unitary level, they questioned whether the Government was suggesting wider than county waste plans. If that was the case, they recommended that further details are provided on how this will be applied.</p> <p>The Woodland Trust commented that the draft National Planning Policy Framework had stated that waste would be considered in a National Waste Management Plan. No date has yet to be given for the publication of this plan. Therefore there will be a lack of environmental protection in the interim which has not been accounted for.</p> <p>Devon County Council and Dorset County Council both listed a number of adopted waste and minerals plans which</p>	<p>Trust, Devon County Council, Dorset County Council.</p>	<p>expectation that local planning authorities should produce a local plan for the area, whilst Section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more local planning authorities may agree to prepare one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		should have been included in Annex C of the initial Environmental Report.		
26	Individual Topics - Biodiversity	<p>On the basis of the content of the consultation draft of the National Planning Policy Framework, Natural England disagreed with the statement in Section 1.2 of the Environmental Reports that the National Planning Policy Framework “maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl and preserve wildlife”.</p> <p>The Woodland Trust highlighted how in ‘Making Space for Nature’ Lawton set out that planning at different geographical scales was vital to inform conservation decisions. It also sets out that planning is pivotal in maximising the contributions of the existing network and ensuring that new components are sited in effective locations. The Trust believed that ‘Nature Improvement Areas’ recommended by</p>	Natural England, Woodland Trust, Scottish Natural Heritage, Environment Agency.	<p>The National Planning Policy Framework was published in March 2012. The finalised version makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provide net gains in biodiversity where possible, and contribute to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures.</p> <p>The National Planning Policy Framework also states that local plans contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</p> <p>The National Planning Policy Framework also asks that, in order to minimise impacts on biodiversity and geodiversity, planning policies should: plan for biodiversity at a</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Lawton would be very difficult to implement without the Regional Strategy in place.</p> <p>Scottish Natural Heritage suggested that the initial Environmental Reports should address the protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the initial Environmental Reports if they identified a framework for establishing networks of green infrastructure across all the regions of England, with the potential to link with Wales and Scotland, rather than just to propose partnerships across local authority boundaries.</p> <p>The Environment Agency suggested that the significance of new emerging initiatives set out in the Natural Environment White Paper, such as Local Nature Partnerships and Nature Improvement Areas should be highlighted. The overall purpose of Local Nature Partnerships is to bring a diverse range of individuals, businesses and organisations together at a local level to create a vision and plan of action for how the natural environment can be taken into</p>		<p>landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.</p> <p>The National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships to assess existing and potential components of ecological networks.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		account in decision making. In the absence of regional policies, Local Nature Partnerships and Nature Improvement Areas could offer a good opportunity to strengthen local action, enable local leadership and operate across administrative boundaries.		
27	Individual Topics - Renewable Energy	RenewableUK were concerned that the Strategic Environmental Assessment process failed to fully account for the impact that the removal of the Regional Strategies would have on the ability of local authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of generating 15% of all energy from renewables by 2020. Overall, they suggested that there will be significant environmental effects of revoking the regional plans, if guidance and support for renewable energy development was not strengthened. Under existing proposals, the key mechanisms for strategic planning and renewable energy would be lost.	RenewableUK	The National Planning Policy Framework, published in March 2012, includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. The National Planning Policy Framework

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>contains a number of policies aimed at encouraging the development of renewable energy development including that local planning authorities should : have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.</p> <p>In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
28	Individual Topics - Transport	<p>Friends of the Earth considered that the removal of the Regional Strategies would in some cases have a negative environmental effect as their transport policies were stronger than those presented in the draft National Planning Policy Framework.</p>	<p>Friends of the Earth</p>	<p>The National Planning Policy Framework, published in March 2012, includes a number of core planning principles. These include the need to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The National Planning Policy Framework makes it clear that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. The National Planning Policy Framework also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.</p> <p>The National Planning Policy Framework is clear that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also says that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>
29	Individual Topics - Water	The Environment Agency were unclear whether the potential impacts of the revocation on the neighbouring Welsh environment had been assessed, for example effects on the rivers flowing from	Environment Agency, Countryside Council for Wales.	The National Planning Policy Framework, which was published in March 2012, is clear that local planning authorities should work with other bodies to assess the capacity of water supply infrastructure, and should set

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Wales into England. They considered that a more robust assessment of the implications for Wales could help improve the future working arrangements across these borders.</p> <p>Countryside Council for Wales noted that development in the South West was dependent on water resources originating in Wales, in many cases, being subject to protection under European environmental legislation and may be at 'abstraction limit'. The dispersal of responsibility for considering the environmental effects on fundamental resources from a strategic to local level may, in Countryside Council for Wales's opinion, compromise the effectiveness of the assessment process and disable the 'prudent use of natural resources'.</p>		<p>out in the Local Plan their strategic priorities and policies for the provision of such infrastructure.</p> <p>More generally the National Planning Policy Framework tells local planning authorities to adopt strategies to mitigate and adapt to climate change and take full account of water supply and demand considerations. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, which could include more frequent droughts. Where appropriate, risks should be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>The National Planning Policy Framework also clearly states that planning policy decisions must reflect and where appropriate promote relevant EU obligations – which include, for example, obligations under the Water Framework Directive.</p>
30	Individual Topics - Brownfield	Campaign to Protect Rural England's position was that revocation, combined with the Government's wider reforms to the	Campaign to Protect Rural England.	The National Planning Policy Framework was published in March 2012. One of the 12 planning principles set out in the National

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	land	planning system, had seen the abandonment of policies aimed at making re-use of previously developed land a priority. They submitted that this was likely to lead to increased urban sprawl and environmental degradation. They also highlighted research by Campaign to Protect Rural England showing that very substantial amounts of brownfield land remained in the region and continues to be produced. They felt that the goal of urban regeneration would suffer significantly through the abandonment of this 'brownfield first' policy - with negative consequences for the environment.		Planning Policy Framework is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The National Planning Policy Framework makes it clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111).
31	Individual Topics - Flooding	The Environment Agency welcomed the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' duties on flood risk management and the complementary duty in the Floods and Water Management Act on bodies to cooperate. The provision of technical guidance, including on flood and coastal	Environment Agency.	In March 2012 the Government published the National Planning Policy Framework which contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: the provision of

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		erosion risk, to complement the National Planning Policy Framework would support Lead Local Floods Authorities and help achieve the duty to co-operate.		infrastructure for flood risk and coastal change management.
32	Individual Topics - Managed Woodland	The South West Woodlands Trust stated that the consultation on the Environmental Report was tokenistic, demonstrated by the fact that there had been no assessment of reasonable alternatives to the revocation of the Regional Strategy.	South West Wildlife Trust.	<p>The updated Environmental Report assesses the impact of revocation of policies ENV1 and ENV5 in the short, medium and long term against the Strategic Environmental Assessment topics set out in Annex D of the updated Environmental Report.</p> <p>The National Planning Policy Framework was published in March 2012, and makes specific reference for local authorities to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (paragraphs 99 and 114).</p> <p>The National Planning Policy Framework states that Local Plans should contain a clear strategy for supporting Nature Improvement Areas where they have been identified. The National Planning Policy Framework also recognises the important role that Local Nature Partnerships have to</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>play in advising local planning authorities, including the assessment of potential new, as well as existing components of ecological networks (paragraph 165).</p> <p>The National Planning Policy Framework also recognises that Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications.</p>

ANNEX B

Consultation and Partner Engagement – Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the South West Regional Strategy ran from 30 November 2012 to 1 February 2013.

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

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

In total 13 detailed written responses were received summarised below by interest group:

- 4 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, and the Countryside Council for Wales);
- 4 Local planning authorities (Dorset County Council, Somerset County Council, North Somerset Council and Purbeck District Council);
- 3 Non Government Organisations and local pressure groups (Town and Country Planning Association, Campaign to Protect Rural England South West and the Royal Town Planning Institute South West); and
- 2 Industry representatives (EDF Energy and RenewableUK).

In addition, 3 statutory consultees (Scottish Natural Heritage, the Scottish Environmental Protection Agency and Historic Scotland) responded that they

had no detailed comments to make on the updated Environmental Report and they anticipated no effects from the Plan on environmental assets in Scotland.

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

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

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
1.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>The Environment Agency noted the assessment was more thorough than that contained in the first Environmental Report and provided a more comprehensive account of the workings of the regional land use and economic development system, past and present. They also welcomed the acknowledgment given in the assessment to the role the draft Regional Strategy played in shaping local plans.</p> <p>English Heritage considered that the updated Environmental Report provided a rigorous approach to analysis.</p> <p>EDF Energy supported the Strategic Environmental Assessment approach undertaken to assess the potential impacts of retaining or revoking the South West Strategy.</p> <p>The Royal Town Planning Institute considered that the Environmental Report and appendices covered a very full range of evaluated subject</p>	<p>Comments noted.</p> <p>The Government welcomes the fact that the English Strategic Environmental Assessment consultation bodies, English Heritage and the Environment Agency consider that the updated Environmental Report on the proposed revocation of the South West Regional Strategy provides a rigorous approach to the Strategic Environmental Assessment and is an improvement on the initial Environmental Report published in October 2011.</p> <p>The Government acknowledges that the updated Environmental Report has been welcomed and thought robust by other parties such as a private company in the energy sector, EDF Energy and the principal body representing planning professionals in the United Kingdom and Ireland, the Royal Town</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>and policy areas, as well as providing some useful material on Core Strategy progress and ‘cameos’ of the region’s six Local Enterprise Partnerships.</p> <p>Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Scotland did not anticipate any significant environmental effects from the revocation of the South West Regional Strategy on the Scottish environment and had no further comments to make on the updated Environmental Report.</p> <p>The Countryside Council for Wales welcomed the efforts made in undertaking the assessment. They raised a number of issues which are dealt with individually within this table.</p>	<p>Planning Institute.</p> <p>The Government welcomes the comments from the three Scottish Strategic Environmental Assessment consultation bodies, Scottish Natural Heritage, the Scottish Environmental Protection Agency and Historic Scotland who do not anticipate any significant environmental effects from the revocation of the South West Regional Strategy on the Scottish environment.</p>
2.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>Natural England pointed out that the Strategic Environmental Assessment should be carried out of the emerging Regional Spatial Strategy rather the existing Regional Planning Guidance note 10. They welcomed the inclusion of draft Regional Spatial Strategy policy in Annex I and the acknowledgement that the Environmental Report would reflect the fact that some local</p>	<p>Comments noted/disagree.</p> <p>The Government considers that the latest assessment fully reflects the requirements of the Directive requirements. However, it disagrees with the view that the methodology used does not hold good for the South West. The emerging Regional Spatial Strategy was not adopted and therefore does not form part of</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>planning authorities had adopted plans between July 2008 and July 2010, but were concerned that there does not appear to be consideration of the impact of draft Regional Spatial Strategy policies in the main report.</p> <p>The Town and Country Planning Association welcome the fact that the Strategic Environmental Assessment process has been repeated with a methodology more closely aligned to the requirements of the Strategic Environmental Assessment Directive. However, they question the application of this methodology for the South West, and considers some innovative elements of later policy are undervalued.</p> <p>The Town and Country Planning Association note the assessment conducts the main analysis on Regional Planning Guidance note 10, with additional references in Appendix D to the emerging draft South West Plan, but which have not had any effect on the assessment scorings. It considers that the loss of the draft South West Regional Spatial Strategy, which provided a strong regional framework, has been underestimated in respect of certain other policy areas.</p>	<p>the statutory development plan. It was therefore not considered as part of the Regional Strategy assessed by the Strategic Environmental Assessment for the purposes of revocation since it was not adopted and cannot be revoked through a statutory instrument.</p> <p>Notwithstanding, given that some local authority plans in the South West have taken account of policies within the emerging draft revised Regional Spatial Strategy, the assessment has also considered, where appropriate, the policies that comprised the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) and these are presented in Appendix I to the updated report. The draft revised Regional Spatial Strategy policies are considered within the main body of the updated Environmental Report, particularly in respect of the overarching spatial strategy, sub-regional housing and employment targets, provision for gypsies and travellers, renewable energy provision and waste. Further consideration of policies within the draft revised Regional Spatial Strategy is presented in Appendix D and Appendix E of the updated Environmental</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			Report whilst Appendix C identifies those quantitative targets of the draft revised Regional Spatial Strategy that are of particular relevance to local plans for comparative purposes.
3.	The overall approach taken to Strategic Environmental Assessment	Dorset County Council is concerned as to whether the Environmental Report adequately considered the implications of the comprehensive removal/condensation of policy. It considers that generic and strategic higher level policies, such as relating to sustainability, climate change or transport for instance, will not be formally covered any more. The Government's expectation that other relevant policies will cover the issue when regional policy is revoked is not guaranteed.	Disagree. As highlighted in Section 4.6 of the updated Environmental Report, "policies contained within the South West Regional Strategy have already been put into effect at the local level since Regional Planning Guidance note 10 and the Regional Economic Strategy were published and in many cases they have been superseded by policy, legislation and guidance published since 2001. Moving forward, the provisions of the National Planning Policy Framework means that a basic framework for the delivery of sustainable development is in place which is compatible with the principles employed in the Regional Planning Guidance note 10 and the Regional Economic Strategy. Local plans can therefore readily deliver the aspirations and proposals of the South West Regional Strategy, using additional

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>mechanisms such as the duty to co-operate.”</p> <p>Further, the updated Environmental Report notes on page xiv of the Non Technical Summary that:</p> <p>“it is expected that the broad spatial approach set out in Regional Planning Guidance note 10 will continue under revocation. Further, whilst revocation removes a number of quantitative Regional Planning Guidance note 10 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.”</p> <p>Section 39 of the Planning and Compulsory Purchase Act 2004 makes it a statutory requirement that any person who or body which exercises any function in relation to local development documents must exercise the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>function with the objective of contributing to the achievement of sustainable development.</p> <p>Section 4.2.1 of the updated Environmental Report states that 'The National Planning Policy Framework sets out that the purpose of planning is to help achieve sustainable development. The presumption in favour of sustainable development is at the heart of the National Planning Policy Framework and is reflected in plan making and decision taking. The strong emphasis on sustainable development which already permeates planning will continue following revocation due to the strong emphasis in the National Planning Policy Framework. The 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.'</p> <p>The National Planning Policy Framework also contains a number of polices aimed at encouraging the development of renewable energy installations including that local planning authorities should: "have a positive strategy to promote energy from renewable and low</p>

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			<p>carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.” In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and</p>

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			<p>Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.</p> <p>Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>The National Planning Policy Framework makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>The National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.</p> <p>The Government recognises the importance of strategic planning and the National Planning Policy Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in</p>

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			<p>individual local plans. For strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, co-operation will be necessary with authorities well beyond an authority's own border.</p> <p>The Government recognises that the duty to co-operate needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross</p>

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			<p>boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>More broadly, it is considered that revocation does not leave a policy vacuum but will be based on a hierarchy of measures that will apply in the short to long term in the absence of the Regional Strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC) , Water Framework Directive (2000/60/EC) , the Flood and Water Management Act 2010); • existing planning policy (such as the National

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Planning Policy Framework and Planning Policy Statement 10);</p> <ul style="list-style-type: none"> • other government policy (such as that articulated in the Natural Environment White Paper); and • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.
4.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>Countryside Council for Wales welcomes the explanation of the development of the plan under scrutiny from Regional Planning Guidance to Regional Spatial Strategy in respect of Table NTS3 (summary of secondary, cumulative and synergistic effects). However, a corresponding explanation/narrative on the history of relevant Strategic Environmental and Habitats Regulation Assessments for this plan would also be welcomed.</p>	<p>Comments noted.</p> <p>Section 2.3.2 of the updated Environmental Report for the South West describes how the development of Regional Planning Guidance note 10 was informed by a sustainability appraisal, even though it pre-dates The Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633). The emerging draft revised Regional Spatial Strategy for the South West was also the subject of ongoing Strategic Sustainability Appraisal (incorporating Strategic Environmental Assessment). A Habitats</p>

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			Regulation Assessment was also undertaken of the draft revised Regional Spatial Strategy. Further detail is provided via the following link: http://www.southwest-ra.gov.uk .
5.	The overall approach taken to Strategic Environmental Assessment	<p>Campaign to Protect Rural England state that the Strategic Environmental Assessment was flawed as it:</p> <ul style="list-style-type: none"> • relies on an optimistic view of the delivery of environmental protection in local plans and the National Planning Policy Framework • relies on untested processes for cooperation between local authorities and lacks any proposals for monitoring the impact of success or failure of this new strategic approach • fails to address how the current arrangements might be improved to ensure an approach to strategic planning which is rigorous and engages all sectors. • fails to address how the Government should tackle the acknowledged regional and national disparities which it envisages emerging 	<p>Disagree.</p> <p>The assessment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the Regional Strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EEC), the Flood and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework and Planning Policy Statement 10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to

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		<p>However, despite the above comments, Campaign to Protect Rural England concluded that they did not see any reason not to rapidly revoke the South West Regional Strategy. However, they believed it was inherently difficult to assess the impact of the revocation of Regional Strategies and were concerned that when considering alternative options the assessment does not appear to consider modifications to the new planning regime or institutions to ensure account is taken of strategic planning in the round</p>	<p>statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning.</p> <p>In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the National Planning Policy Framework have been referenced in the individual policy assessments to provide a substantial alternative source of planning policy relevant to the Local Plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local examples of current cooperation are also cited where available. Examples where authorities have been co-operating analogous to the duty to co-operate include through the preparation of Joint Core Strategies (Christchurch and East Dorset; Gloucester, Tewkesbury and Cheltenham; North Devon and Torrington); and West Dorset, Weymouth and Portland councils preparing (Local Plan). Joint plans already adopted include the West of England Joint Waste Core Strategy (covering Bath and North</p>

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			East Somerset, Bristol, North Somerset and South Gloucestershire).
6.	The overall approach taken to Strategic Environmental Assessment - housing	Royal Town Planning Institute noted that the report structure and its conclusions were substantially the same as for the other regions. They also noted that one area which does show a difference is that of new housing allocations, which is clearly one that requires a strategic, more than local area, planning approach.	<p>Comment noted.</p> <p>A similar approach has been adopted with all the updated environmental reports to ensure consistency in approach in both assessment and in findings. The environmental effects of revocation of the South West Regional Strategy have been properly considered on the basis of the particular circumstances for this region. The conclusions reached may in some circumstances apply to the South West as it does in respect of one or more of the other regions.</p> <p>The Government proposed the plan to revoke the South West Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth. Every local area has its own set of needs and priorities, its aspirations, unique features and heritage. Only local people understand this so when they have tools to plan, development happens through consensus by recognition of</p>

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			<p>the benefits of development to the community and with wider benefits for growth.</p> <p>Section 4.6 summarises the findings of the assessment and includes the following:</p> <p>'...it is expected that the broad spatial approach set out in RPG10 will continue under revocation. Further, whilst revocation removes a number of quantitative Regional Planning Guidance 10 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 National Planning Policy Framework 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</p>

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			<p>land reused for development and could potentially lead to an increase in development on greenfield sites.'</p> <p>It is Government policy to boost significantly the supply of new 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 growth. In addition, the Growth and Infrastructure Bill similarly seeks to address issues affecting current housing supply. Revocation of the South West Regional Strategy, the National Planning Policy Framework policies and the presumption in favour of sustainable development are only part of this commitment to growth and housing provision.</p> <p>The National Planning Policy Framework and the duty to co-operate require that local planning authorities use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in</p>

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			<p>the Framework (including, for example, those on environmental designations). They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>Local plans are subject to the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework. Where local planning authorities have failed to co-operate on cross boundary matters, it is also likely that their Local Plan will not be deliverable and as such it may be found unsound.</p>
7.	<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>Somerset County Council reiterated particular concerns raised in response to the first consultation which remained unresolved, namely:</p> <ul style="list-style-type: none"> - the need for Regional Planning Guidance note 10 to be looked at in its entirety, and that its environmental policies work alongside the development strategy in an integrated way; and. - no use has been made of the Annual Monitoring Reports in Regional Planning 	<p>Disagree.</p> <p>As highlighted in Section 4.6 of the updated Environmental Report, “policies contained within the South West Regional Strategy have already been put into effect at the local level since Regional Planning Guidance 10 and the Regional Economic Strategy were published and in many cases they have been superseded by policy, legislation and guidance published since 2001. Moving forward, the provisions of</p>

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		<p>Guidance note 10 when assessing environmental effects of implementing those policies against the effects of removing them.</p> <p>Somerset County Council were also concerned that policies had been read and assessed in isolation and not in the context of the Regional Strategy as a whole. Regional Planning Guidance note 10 contains specific measures to protect and enhance growth impacts on biodiversity, soil, water, material assets, cultural heritage and landscape. These policies are intended to be considered and applied in conjunction with any other policies, for example, growth proposals in Taunton (SS14), to provide certainty about implications.</p>	<p>the National Planning Policy Framework means that a basic framework for the delivery of sustainable development is in place which is compatible with the principles employed in Regional Planning Guidance 10 and the Regional Economic Strategy. 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.”</p> <p>In accordance with the requirements of the Strategic Environmental Assessment Directive, the updated Environmental Report has given consideration to the secondary, cumulative and synergistic effects of the plan to revoke to the South West Regional Strategy on the region and in conjunction with other regional plans. A summary of these effects is presented in Table 4.5 of the updated Environmental Report against each of the Strategic Environmental Assessment topics.</p> <p>In respect of the use of Annual Monitoring Reports of Regional Planning Guidance note 10, in most cases it was not considered appropriate to use this information in its entirety</p>

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			<p>as these reports contain some outdated data (the latest Annual Monitoring Report covered the period April 2008 to March 2009). Notwithstanding, for some datasets (e.g.in respect of access to services), information from this latest report was utilised in the baseline analysis presented in Appendix E to the updated Environmental Report that was subsequently used to inform the assessment.</p>
8.	<p>The overall approach taken to Strategic Environmental Assessment – mitigation</p>	<p>North Somerset Council questions how mitigation is considered within the Strategic Environmental Assessment, including that there is no assessment of how effective mitigation can be. The Council contends that, whilst references are made to mitigation 'to a degree', the report does not ask whether mitigation can be increased. Furthermore, it considers that some text is contradictory - Appendix E, paragraph 4.7.1 states that greenfield development will have a negative effect on soils but then goes on to say that all significant effects are positive and so no mitigation is proposed.</p>	<p>Disagree.</p> <p>The updated Environmental Report provides an assessment of retention, partial retention and revocation of the Regional Strategy. In particular Appendix D contains an assessment matrix covering the effects of retention and revocation of each Regional Strategy policy against all Strategic Environmental Assessment topics in the short, medium and long term and includes consideration of permanent and temporary and positive and negative effects. The commentary outlines the likely significant effects, justification for the scores given, any mitigation measures, assumptions and uncertainties. It is not clear how the effectiveness of mitigation identified in the</p>

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			<p>updated Environmental Report could be assessed or, further, increased as implied in this response.</p> <p>It is not considered that the text in Appendix E referred to in this response is contradictory. The assessment contained in Appendix D of the updated Environmental Report has identified the potential for negative effects on soils as a result of development on greenfield land (whether the South West Regional Strategy is revoked or not). However, the adverse effects identified have not been assessed as significant and in consequence, no mitigation has been identified within the updated Environmental Report (as highlighted in Appendix E).</p>
9.	<p>The overall approach taken to Strategic Environmental Assessment – structure plan policies</p>	<p>North Somerset Council are concerned about the methodology used to assess the revocation of saved structure plan policies in Appendix B of the Environmental Report. In addition, it notices that paragraph 2.3.6 of the main report, did not mention the 'generic' category.</p> <p>In respect of the Avon Structure Plan in particular, the conclusion reached is that there</p>	<p>Disagree/Comment noted.</p> <p>Saved structure plans remained in the South West since the draft revised Regional Spatial Strategy was not adopted. In the meantime, local planning authorities continued to put up-to-date plans in place. The updated Environmental Report assesses the impacts of revocation, recognising that local plans would</p>

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		<p>are no policies worth saving, since no gaps are identified. In fact, there are a number of elements not found elsewhere:</p> <ul style="list-style-type: none"> -Policy 1 - conservation of resources, other than energy -Policies 4, 48 & 49 - priority for transport schemes that reinforce the locational strategy -Policy 16 - retention of Green Belt land in rural uses -Policy 33 - phased release of housing land to achieve certain priorities <p>Dorset County Council questioned why some of the saved Bournemouth, Dorset and Poole Structure Plan policies had been termed generic. A better explanation of the terminology used and the reasoning behind the categorisation would improve the report.</p>	<p>set the framework for decisions on planning applications should the Government decide to revoke the regional strategy and saved structure plan policies.</p> <p>Appendix B of the updated Environmental Report sets out the Government's assessment on whether or not the saved structure plans remained valid and are not superseded, taking account of legal and policy developments. Where the Appendix B assessment identifies saved structure plan policies as still relevant, the environmental implications of their revocation when proposed needs to be included in the overall assessment of the revocation of the Regional Strategies. The reference to generic policy is where the Government considers that the policy is exhortatory/aspirational and unlikely to have a direct effect on the determination of a planning application.</p> <p>The Government does not share the view that there are policy gaps if the Avon Structure Plan is revoked:</p> <ul style="list-style-type: none"> - the relevant parts of Policy 1 referred to are

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			<p>covered by various parts of the National Planning Policy Framework, including paragraphs 18 and 113 (brownfield land) and Section 13 (minerals);</p> <ul style="list-style-type: none"> - for policies 4, 48 and 49, the Government considers that this issue is adequately covered through existing legal and policy frameworks, including through Local Transport Plans and the National Planning Policy Framework. The Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans. In particular local authorities should continue to ensure their land use and local transport plans are mutually consistent, and deliver the most sustainable and effective development for their area. Section 4 of the National Planning Policy Framework set out policies on sustainable transport. - policy 16 is covered by policy RD3 of the North Somerset replacement Local Plan 2007, along with paragraphs 79-92 of the National Planning Policy Framework. - policy 33 has expired since it only sets out

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			levels of housing provision until 2011. In addition, Government policy on provision and delivery of housing is set out in the National Planning Policy Framework, especially paragraphs 47-55.
10	The overall approach taken to Strategic Environmental Assessment – assessment of factors	North Somerset Council were concerned that the assessment of the interrelationship between environmental effects has not been done in such a way that the process could be understood. The Council contend that Appendix E of the Environmental Report does no more than highlight where links exist; it does not, as the Strategic Environmental Assessment Directive envisages, consider the likely significant effects on the inter-relationship between factors, which is of key importance in terms of cumulative and synergistic effects across the boundaries between factors.	Disagree. Section 4.5 of the updated Environmental Report makes it clear that: 'In determining the significance of effects of a plan or programme, the Strategic Environmental Assessment 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 Strategic Environmental Assessment topics. This assessment is relative to the legislative and policy framework that remains in place once the regional strategies are revoked.'

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Section 4.6 of the updated Environmental Report outlines the wider implications and effects of revocation and retention of the South West Regional Strategy. This notes that: 'A number of issues are arguably more efficiently and effectively addressed across wider areas than individual local authorities such as major infrastructure provision, biodiversity planning, climate change mitigation and adaptation, and renewable energy'.</p>
11	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>Countryside Council for Wales were concerned that the Summary of the State of the Environment in the South West, Table NTS1, includes no reference to International Sites shared in 'common' with Wales. The Council's response to the earlier Environmental Report had raised the issue of the need to consider not only the environmental baseline for the Plan area itself, but the additional need to consider the environment of areas potentially affected by the Plan and its revocation, notably the Severn Estuary Special Area of Conservation/Special Protection Area and Ramsar site.</p>	<p>Comment noted.</p> <p>Table NTS1 is intended to provide a summary of the state of the environment for the South West. However, the table refers to Annex G of the report, which lists those sites that have the highest environmental protection in the South West. This list includes the Severn Estuary Special Area of Conservation/ Special Protection Area and Ramsar site.</p> <p>In addition, the national baseline for each topic in Appendix E covered the existing situation in England, but also Wales and Scotland. For example, the water baseline for the South West (section 5.3.2) identified that the Severn River</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			Basin District and the Severn Estuary covered areas other than the South West.
12	<p>Whether the likely significant effects have been identified, described and assessed – Habitats Directive Assessment</p>	<p>Countryside Council for Wales were concerned that the ‘safeguards’ proposed in respect of potential adverse effects resulting from the revocation rely on ‘deferring down’ the responsibility for consideration of Habitats Regulations issues to the local level. Likely adverse effects resulting from the South West Regional Strategy and its revocation may relate to the Severn Estuary Special Area of Conservation/Special Protection Area/Ramsar site which is a shared ‘European’ site with Wales. It is unlikely that the potential for these adverse effects in Wales could be or will be addressed to any satisfactory degree, by individual competent authorities in the South West.</p>	<p>Disagree.</p> <p>The Government believes that the legislative and policy protections for European Habitat sites in both England and Wales are sufficient to allow the conclusion that the revocation of South West Regional Strategy is unlikely to result in a significant effect on a European site. Responsibility for Habitats Regulations issues for plan making and planning applications lie with the relevant local authority and, for National Planning Statements and Nationally Significant Infrastructure Projects, the Secretary of State. Other competent authorities such as the Marine Management Organisation are also the competent authority for development primarily permitted under other legislation. In addition, other plans and strategies such as water resources management plans drawn up by water companies are also subject to Strategic Environmental Assessment and Habitats Regulations Assessment.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>The Countryside Council for Wales consider that a Habitats Regulations Assessment should have been undertaken. They cannot agree with the view that revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive without a revocation Habitats Regulation Assessment being undertaken.</p>	<p>Comment noted.</p> <p>Section 1.4 of the updated Environmental Report addresses the requirements of the Habitats Directive (92/43/EEC) and concludes that ‘the Government’s view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive’. This conclusion was reached on the basis of a screening exercise: each Regional Strategy policy (in this case Regional Planning Guidance note 10) was reviewed to identify those that referred to the protection of European sites and those which are locationally specific – i.e. they direct development to a particular parcel of land. Policies that were more pervasive in nature or provided a more general requirement for a local planning authority to make provision for a certain type or amount of development, were screened out at that stage, as it is for each local planning authority to decide on a response to the pervasive policies and determine the most suitable locations for the development – taking account, where necessary, of the finding of their own Habitats Regulations Assessment.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>This exercise identified a number of policies in the South West Regional Strategy (but in particular Policy EN1) which sought to avoid effects on European sites. These policies sought to mitigate for development that the Strategy itself encouraged. Furthermore, this exercise recognised that in a number of areas, the Regional Strategy policy had been superseded by more up-to-date local plans. In many cases, the preparation of these plans have been informed by a Sustainability Appraisal and Habitats Regulations Assessment, in line with legislative requirements.</p> <p>It was therefore considered further in order to determine whether it could be concluded that the revocation would not have adverse effects on such sites. Consideration was given, among other things, to the fact that: (i) the 'development policies' in the Regional Strategy they seek to mitigate would cease to apply were the Strategy to be revoked; and (ii) that the Conservation of Habitats and Species Regulations 2010 require that a competent authority, such as a local planning authority, in</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>exercising any of their functions must have regard to the requirements of the Habitats Directive. This exercise did not identify any likely significant effects on European sites.</p> <p>This conclusion was supported by the findings of the Strategic Environmental Assessment. The Strategic Environmental Assessment assessed the likely effects of the revocation of the Regional Strategy, and the likely effects of retaining the Strategy (and a number of reasonable alternatives involving partial revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which include biodiversity, fauna and flora). The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. The guidance on a significant effect for biodiversity includes reference to negative and sustained effects on European or national designated sites and/or protected species. No significant negative effects on</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>biodiversity were found, nor were any significant negative effects found from reasonable alternatives. Monitoring measures have been proposed for the effects on biodiversity, including for Wales, (as well as the other topics) to help review the effects of the decision.</p> <p>The Secretary of State is therefore proceeding on the basis that the implementation of the plan as adopted (the Plan to Revoke the Regional Strategy) will not have a significant effect on a European site, including those that are shared with Wales.</p>
13	<p>Whether the likely significant effects have been identified, described and assessed – water</p>	<p>Countryside Council for Wales notes the reference to legally binding targets for water discharges in respect of the Environmental Permitting Regulations. However, they consider that in the context of the Severn Estuary Special Area of Conservation/Special Protection Area/Ramsar site, it may be that water quality targets should be more stringent and reflect the Estuary's status as a European Site.</p>	<p>Comments noted.</p> <p>Regulatory mechanisms already exist to ensure an adequate, safe and sustainable water supply. National policy already gives the Environment Agency, water and sewerage companies, developers, landowners and others an important role in taking a pro-active approach to working together to identify, characterise, plan and manage the water environment taking into account biodiversity sites of international importance.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>As stated in Section 5.2.2 of Appendix E of the updated Environmental report, the European Union Water Framework Directive include objectives for surface water, groundwater, transitional and coastal water bodies are to achieve 'good status' by 2015, or an alternative objective where allowed; and comply with requirements for protected areas. The Environment Agency is responsible for preparing River Basin Management Plan for each of the 11 River Basin Districts in England and Wales including objectives for surface water, groundwater, transitional and coastal water bodies.</p> <p>Discharge of water, including from water treatment works, is governed by the Environment Permitting Regulations 2010 with the Environment Agency acting as the regulatory body. The Agency has to consider the impact of discharges against targets in the River Basin Management Plans. In addition, the Environment Agency for England and Wales has recently completed a review of existing abstraction licences to assess the impact on habitats sites.</p>

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14	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>The Town and Country Planning Association consider that the Environmental Report does not assess the implications of the loss of the guiding principles, with figures for individual districts, on gypsies and travellers in the emerging South West Regional Spatial Strategy. Rather it relied instead on an assessment that Regional Planning Guidance note 10 did not have such a policy, revocation is not expected to affect provision.</p>	<p>Comment noted.</p> <p>The draft revised Regional Spatial Strategy was not adopted and therefore does not form part of the statutory development plan. It was therefore not considered as part of the Regional Strategy assessed by the Strategic Environmental Assessment for the purposes of revocation since it was not adopted and cannot be revoked through a statutory instrument.</p> <p>Although some local authority plans in the South West have taken account of policies within the draft revised Regional Spatial Strategy, the assessment has also considered, where appropriate, the policies that comprised the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008). These policies are considered within the main body of the updated Environmental Report including in respect of provision for gypsies and travellers. Further consideration of policies within the draft revised Regional Spatial Strategy is presented in Appendix D and Appendix E of the updated Environmental Report whilst Appendix C identifies those quantitative targets (including</p>

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			<p>pitch requirements for gypsy and travellers contained in Policy GT1 and Policy GT2) that are of particular relevance to local plans for comparative purposes. It finds that only four core strategies adopted by local planning authorities have adopted this policy and/or are based on local assessments of need. The assessment identifies that 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 Regional Planning Guidance note 10 combined with a targeted requirement within the draft revised Regional Spatial Strategy.</p> <p>It is the Government's view that local authorities are best placed to understand the needs of their communities. Planning policy for travellers, published in March 2012, makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community. Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot</p>

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			<p>targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust evidence of need that will be tested at the Local Plan examination. This includes:</p> <ul style="list-style-type: none"> (i) identifying and updating annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets; (ii) identifying a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15; (iii) considering the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area. The duty to co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.

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		<p>The Town and Country Planning Association consider that little recognition has been made of any potential differences in the location of new development as a result of revocation. The risk of greater dispersal may have been underestimated because of the loss of locational guidance in the draft South West Regional Spatial Strategy which identified areas of search for sustainable urban extensions. High demand areas may also be under pressure from</p>	<p>The proposal to abolish Regional Strategies is part of a wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority councillors on their leadership role in site provision.'</p> <p>Disagree.</p> <p>Section 4.2 of the updated Environmental Report states that:</p> <p>"...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 local planning authorities do not currently have a local plan adopted shortly</p>

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		speculative housing development applications in the absence of up-to-date local plans.	<p>before or after the publication of Regional Planning Guidance 10 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 Regional Spatial Strategy (see Appendix I) was in general alignment with that of Regional Planning Guidance note 10 and the Regional Economic Strategy in seeking to focus growth within urban areas (particularly in the northern sub-region).</p> <p>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</p>

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			<p>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 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.'</p> <p>The National Planning Policy Framework seeks to deliver sustainable development, whilst the core planning principles outlined at paragraph 17 of the document state, amongst other elements, that planning should:</p> <ul style="list-style-type: none"> • 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

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			<p>previously development; and</p> <ul style="list-style-type: none"> 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. <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking.</p> <p>The Government recognises the importance of</p>

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			<p>strategic planning and the National Planning Policy Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans.</p> <p>This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. For strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>In addition, existing legislation concerning</p>

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			<p>environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EEC), the Floods and Water Management Act 2010 – which includes a duty to co-operate) is part of the hierarchy of measures that will apply in the short to long term in the absence of the South West Regional Strategy.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning</p>

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			<p>authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p>
15	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>Campaign to Protect Rural England shares the view reached in Section 4.5 of the updated Environmental Report about secondary cumulative and synergistic effects, and is concerned that increasing development pressures in regions such as the South West will increase environmental and landscape challenges, whilst undermining regeneration in urban areas in other parts of the country.</p>	<p>Comments noted.</p> <p>The Government recognises the importance of strategic planning and the National Planning Policy Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans.</p> <p>This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial</p>

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			<p>development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. For strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>In addition, existing legislation concerning environmental protection (such as the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EEC), the Flood and Water Management Act 2010 – which includes a duty to co-operate) is part of the hierarchy of measures that will apply in the short to long term in the absence of the South West Regional Strategy.</p>

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			<p>The Government recognises that the duty to co-operate needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and</p>

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			<p>made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In addition, The National Planning Policy Framework includes, as part of the core land-use planning principles, that planning:</p> <ul style="list-style-type: none"> • take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas; 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

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			be made sustainable.
16	<p>Whether the likely significant effects have been identified, described and assessed</p>	<p>Campaign to Protect Rural England note the conclusion in the assessment that the South West is likely to see increased housing and other development pressures, so is then surprised to see that Table NTS2 predicts significant benefits across all Strategic Environmental Assessment natural and built environment topic areas where one would expect pressures to emerge. Transport policies cannot address regional imbalances without wider policy, planning and funding support for urban regeneration.</p>	<p>Comment noted.</p> <p>The findings referred to in this response that are presented in Table NTS2 relate particularly to the revocation of Regional Planning Guidance note 10 Policies EN1-EN5 which deal with the natural and built environment. As noted, the findings presented in the updated Environmental Report indicate that revocation of these policies is unlikely to affect local authorities' provision and planning for the environment. Further, significant positive effects are expected across many of the Strategic Environmental Assessment topics as a result of the implementation of a combination of existing statutory environmental protection and the application of the National Planning Policy Framework policies.</p> <p>However, Section 4.2 of the updated Environmental Report does identify the potential for adverse effects across several Strategic Environmental Assessment topics including biodiversity, soil, water, air, climatic factors, material assets, cultural heritage and landscape, particularly arising from new</p>

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			housing and economic development, although these effects would be similar to those if policies on housing and economic development contained within Regional Planning Guidance note 10 were retained. This reflects the fact that revocation will not affect local authorities planning for growth and in providing for these needs.
17	Whether the likely significant effects have been identified, described and assessed	Somerset County Council expressed concerns about contradictions in the analysis presented in Appendix D (with specific reference to Policies SS6 and SS7 amongst others), with some sections stating there was not sufficient coverage of Local Plans in the South West from which to assess the effects of revocation whilst others stated that most Local Plans have been in place since the publication of Regional Planning Guidance note 10. This suggests that the analysis has not been undertaken with consistent baseline information.	Comment noted. The commentary in Appendix D to the updated Environmental Report highlights that, as Regional Planning Guidance note 10 Policy SS6 does not identify other designated centres for growth in the region and there is not complete coverage of local plans prepared in conformity with Regional Planning Guidance note 10 (and which therefore identify other designated centres for growth in accordance with Policy SS6), effects on some topics under retention are uncertain. Under revocation, the assessment has identified that those positive effects on population and human health, air and climatic factors are likely to be similar as under retention. This reflects the fact that most local plans in the region have been in place since

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			<p>Regional Planning Guidance note 10 was published and it is therefore considered that there is unlikely to be a clear shift in plan policy in the short term. Notwithstanding, as with retention, the assessment identified that effects on the remaining Strategic Environmental Assessment topics would be uncertain. This reflects the fact that the future approach to the distribution of development in the region in respect of other centres for growth is unknown and therefore the type and magnitude of effects in the medium to long term are more uncertain, particularly with respect to biodiversity, soil, water, material assets and landscape.</p> <p>Similarly, Regional Planning Guidance note 10 Policy SS7 does not identify the quantum of development to be provided at settlements not designated as principal urban areas or other designated centres for growth and there is not complete coverage of local plans across the region that are in conformity with Regional Planning Guidance note 10. In consequence, impacts on biodiversity, soil, water, material assets and landscape have been assessed as uncertain. Under revocation, this uncertainty is likely to remain as the future approach to the</p>

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			distribution of development in the region is unknown until updated plans are in place.
18	Whether the likely significant effects have been identified, described and assessed – brownfield land	Dorset County Council considered the assessment underestimated the possible effects of revoking brownfield policy. The Council argue that removal of the specific target on brownfield land in Regional Planning Policy 10 could potentially result in an increase in development on greenfield land which, in a rural region like the South West, could lower the ambitions of local councils to develop brownfield land. Combined with the loss of overarching policies steering development to Principal Urban Areas (it will give local councils more discretion in the development of their settlement strategies) it could result in a higher proportion of development on greenfield land.	Disagree. The updated Environmental Report highlights that the removal of the specific brownfield target contained within Regional Planning Guidance note 10 could reduce the amount of brownfield land reused for development and could potentially lead to an increase in development on greenfield sites. However, the National Planning Policy Framework includes, as part of the core land-use planning principles, that planning: <ul style="list-style-type: none"> • take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas; • actively manage patterns of growth to make

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			<p>the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and</p> <ul style="list-style-type: none"> 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. <p>In addition, the National Planning Policy Framework is clear that local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites.</p> <p>The National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the</p>

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			<p>approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p> <p>Additionally, the updated Environmental Report highlights that, the majority of local plans within the region have been in place since Regional Planning Guidance note 10 was published and 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. 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 Local Enterprise Partnerships. The result is that the broad spatial strategy identified in Regional Planning Guidance note 10 (i.e. focusing the majority of development within the region's Principal Urban Areas) is likely to continue.</p>
19	Whether the likely	Countryside Council for Wales asked for	Comment noted.

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	<p>significant effects have been identified, described and assessed</p>	<p>clarification on whether</p> <ul style="list-style-type: none"> - transport and energy infrastructure had been included within this Strategic Environmental Assessment process, for example, as material assets; - in respect of Table 3.4, whether ‘significance’ has been considered in the context of environmental limits and capacities and whether consideration has been given to ‘causal pathways’ in respect of indirect and cumulative effects. 	<p>The environmental assessment has considered transport and energy infrastructure under the assessment of relevant policies contained within Regional Planning Guidance note 10 (but in particular policies TRANS1-10 and RE6).</p> <p>Table 3.4 is illustrative of the approach to defining significance thresholds in Appendix E of the updated Environmental Report. Appendix E of the updated Environmental report contains an assessment of the likely significant effects (by topic) of the revocation and retention of individual policies drawing on the assessment of all policies in Appendix D. The topic chapters contain information required by Annex I (b) to (g) of the Strategic Environmental Assessment Directive and are considered germane to the assessment. This includes information on: 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.</p> <p>The assessment uses definitions of significance for each of the assessment topics to aid</p>

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			<p>transparency and consistency in the assessment and minimise the likelihood of any subjectivity. Where appropriate, environmental limits and capacities have been taken into account in these definitions. For example, Table 5.2 in relation to the water topic states that a significant negative effect would be one where “abstraction is beyond sustainable levels”. Secondary, cumulative and synergistic effects including those that may arise by ‘causal pathways’ are specifically considered in section 4.5. These are presented in each topic section of Appendix E.</p>
20	<p>Reliance on the National Planning Policy Framework and the duty to co-operate</p>	<p>Campaign to Protect Rural England question the strategic vacuum created by the loss of regional planning in relation to planning housing needs, which should mean developing brownfield sites within urban areas before the release of greenbelt or greenfield land is considered. A strong duty to co-operate between neighbouring urban and rural authorities is required.</p> <p>Campaign to Protect Rural England have concerns that the duty will result in weight being given to the views of unaccountable bodies,</p>	<p>Comments noted.</p> <p>Sections 4.5 and 4.6 of the updated Environment Report identify uncertainties associated with the implementation of the duty to co-operate in the short and medium term:</p> <p>‘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</p>

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		<p>such as Local Enterprise Partnerships. All interests, including environmental interests, should be heard in respect of strategic planning issues.</p> <p>Campaign to Protect Rural England are concerned that the mechanisms being put in place to deal with the strategic level of planning appear to be poorly explained and weak. They are unconvinced that the duty to co-operate, especially applied in the context of the National Planning Policy Framework, will result in better cooperation between councils and may be used by councils to undermine adjoining local plans.</p> <p>Dorset County Council are concerned that there is not sufficient certainty that the duty to co-operate will address or deliver the strategic issues which previously would have been a matter for the Regional Strategy, particularly in relation to matters which are likely to require a shared vision or strategy across a wider area. The assessment should be far stronger in acknowledging the potential risks of losing a strategic tier of the development plan.</p> <p>Dorset County Council consider that</p>	<p>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.</p> <p>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</p>

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		<p>overarching issues such as population change, housing need, climate change settlement patterns, and infrastructure needs are all relevant matters where a strategic understanding is essential to the interpretation of the National Planning Policy Framework's presumption in favour of sustainable development. Revocation could thus reduce the ability to determine whether or not a proposal is actually sustainable in the context of the presumption, and could lead to approvals on appeal which may not provide the most sustainable form of development in the longer term.</p>	<p>expected that the broad spatial approach set out in Regional Planning Guidance 10 will continue under revocation.'</p> <p>Revocation of the South West Regional Strategy does not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans. The duty to co-operate requires local authorities and other public bodies (such as the Environment Agency and Natural England) to work together constructively, actively and on an on-going basis in relation to planning for strategic, cross-boundary matters in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee,</p>

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			<p>informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local authorities may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>The National Planning Policy Framework makes it clear that local planning authorities should work collaboratively with private sector bodies, which would include Local Enterprise Partnerships which have a contribution to make</p>

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			<p>to the strategic planning function along with bodies like utility and infrastructure providers.</p> <p>The National Planning Policy Framework is clear that:</p> <ul style="list-style-type: none"> • the planning system should be genuinely plan-led and support sustainable economic growth, proactively driving the homes and jobs that we need. • local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites. • in line with the presumption in favour of sustainable development, local councils should approve development that accords with the local plan. Where that plan is out of date, councils must grant planning permission for development that is sustainable without delay. • local councils must plan in their local plans for strategic development, reflecting the strategic priorities set out at paragraph 156 of the Framework. <p>The National Planning Policy Framework states</p>

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			<p>that local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>
21	<p>Reliance on the National Planning Policy Framework and the duty to co-operate</p>	<p>Whilst the Royal Town Planning Institute would not disagree with the conclusion reached that many policies in Regional Planning Guidance note 10/the emerging South West Regional Spatial Strategy have been incorporated at the local level, with the broader strategic context now provided by the National Planning Policy Framework, it is a big assertion</p>	<p>Comments noted.</p> <p>Sections 4.5 and 4.6 of the updated Environment Report identify uncertainties associated with the implementation of the duty to co-operate in the short and medium term:</p> <p>‘In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an</p>

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		<p>to make that strategic policies at the regional level are no longer needed in order to protect the region's exceptional natural environment. It remains concerned in Section 2 of the updated Environmental Report that too much faith has been placed in, and assumptions have been made, on cross-authority working, linked to the duty to co-operate, to deliver strategic planning in the South West, prior to operational experience emerging.</p> <p>Campaign to Protect Rural England agrees that removal of regional strategies may allow better discussions between authorities across regional boundaries but they are not convinced that the existing approach provides enough of a strategic steer.</p> <p>The Town and Country Planning Association believe that too much reliance has been placed on the assumption that local planning authorities will continue to work together on cross boundary strategic issues, and that a policy reference to the National Planning Policy Framework and the duty to co-operate are not effective substitutes for regionally specific policies, including on key environmental topics.</p>	<p>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.</p> <p>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</p>

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		<p>RenewableUK consider that the updated Environmental Report states that most issues arising from the revocation of regional strategies will be dealt with by the National Planning Policy Framework and at the local level of planning. The revocation of regional strategies and number of Planning Policy Statements means that revocation will have a detrimental effect on the deployment of onshore wind, carbon dioxide emission reductions and climate change mitigation.</p>	<p>scale, could be ignored or their potential not realised. However, as noted above it is expected that the broad spatial approach set out in Regional Planning Guidance 10 will continue under revocation.'</p> <p>The Government recognises the importance of strategic planning and the National Planning Policy Framework makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans.</p> <p>This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans, including within the South West region. The duty to co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the</p>

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			<p>Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance may mean that local plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such the local plan may be found unsound.</p> <p>As a further check, the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and regulations made under the 2004 Act require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these</p>

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			<p>reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the duty to co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan making. The prescribed bodies are:</p> <ul style="list-style-type: none"> - the Environment Agency; - the Historic Buildings and Monuments Commission for England (English Heritage); - Natural England; - the Mayor of London; - the Civil Aviation Authority; - the Homes and Communities Agency; - Primary Care Trusts; - the Marine Management Organisation; - the Office of Rail Regulation; - the Highways Agency; - Transport for London; - Integrated Transport Authorities; and - Highway authorities.

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			<p>The National Planning Policy Framework also makes it clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>However, protection of the natural environment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework, as there exists a hierarchy of measures that will apply in the absence of the South West Regional Strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework and Planning Policy Statement10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the

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			<p>Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. Water resource management plans are subject the Strategic Environmental Assessment Directives requirements and the Habitats Directive.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012. Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change. In addition, as noted in the updated Environmental Report, Regional Planning Guidance note 10 Policy RE6 is outdated.</p>

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		<p>Dorset County Council do not agree with the assumption made in the report that priorities for the Bournemouth-Poole conurbation would continue to be established at the regional level under the duty to co-operate, as there are no mechanisms for agreement to be reached at this level. It considers it is too soon to assume that the duty to co-operate will ensure similar outcomes across all topic areas in the way that an agreed regional strategy would.</p>	<p>With specific regard to the Bournemouth-Poole conurbation, Section 4.3 of the updated Environmental Report highlights that the overarching objectives of both the adopted Poole Core Strategy and draft Bournemouth Core Strategy are broadly comparable to those of Regional Planning Guidance note 10 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 cooperation across a number strategic issues in this sub-region including, for example, economic development (via the Dorset Local) and transport (Bournemouth, Poole and Dorset</p>

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			Councils have prepared a Local Transport Plan).
22	Reliance on the National Planning Policy Framework and the duty to co-operate	Dorset County Council consider that, in the absence of a Regional Strategy it will be harder for local planning authorities to assess the strategic impacts, including cumulative effects, of their planned growth, or to identify effective mitigation strategies for any adverse impacts. This poses an environmental risk which the Strategic Environmental Assessment ought to recognise. It requests that the environmental assessment takes account of this overarching uncertainty and identifies a potential risk for impacts to occur in areas where effective mechanisms for strategic planning across meaningful areas (such as Local Enterprise Partnership areas, housing market areas, etc.) are not agreed by local planning authorities. Such recognition in the assessment will help to strengthen the incentive for effective cooperation and reduce the risk of adverse environmental impacts arising from the loss of the Regional Strategy.	Comments noted. All Local Plans are subject to sustainability appraisal under Section 19(5) of the Planning and Compulsory Act 2004. In undertaking this requirement, local planning authorities must also incorporate the requirements of the European Union Directive 2001/42/EC (the Strategic Environmental Assessment Directive). In completing the Sustainability Appraisal, the local planning authority will necessarily have to consider the cumulative effects of the planning policies. Similarly, under the Habitat Regulations 2010 any land use plan likely to have a significant effect upon a Special Protection Area, Special Area of Conservation or Ramsar site must be subject to an appropriate assessment to determine the implications for the designated site in view of it's conservation objectives. The appropriate assessment will also require consideration of the in-combination effects of the proposed land use plan and other plans. Together, these provide an effective basis from which

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			<p>cumulative effects of future planning policies can be assessed. Sections 4.5 and 4.6 of the updated Environment Report identify uncertainties associated with the implementation of the duty to co-operate in the short and medium term:</p> <p>'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.</p> <p>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</p>

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			<p>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 Regional Planning Guidance 10 will continue under revocation.'</p> <p>The conclusions, as part of the updated Environmental Report will remain available to local planning authorities to reference in completing sustainability appraisals on their local plans.</p>
23	Reliance on the National Planning Policy Framework and	The Environment Agency welcome the reflection in the appraisal to the influence of the National Planning Policy Framework on local plans and the waste and mineral planning	The Government is pleased to note the support for strategic planning from the Environment Agency.

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	the duty to co-operate	<p>processes. They considered that with effective cooperation amongst authorities, environmental issues of wider concern can be addressed without the regional plan.</p> <p>The Environment Agency supports the duty to co-operate and, as a “named party”, will provide evidence to support local planning authorities to consider cross-boundary planning issues.</p>	
24	Reliance on the National Planning Policy Framework and the duty to co-operate – guidance	<p>The Environment Agency suggest that the Strategic Environmental Assessment could recommend that advice is provided to local authorities and other partners to assist cross boundary planning on Water Framework Directive objectives, flood risk and climate change. This could be addressed through Lord Taylor’s recommendation in his Planning Practice guidance report that there is a need for guidance to support the duty to co-operate.</p> <p>RenewableUK states that the Government should provide guidance to local planning authorities on the duty to co-operate (as has also been recommended in the Lord Taylor review report on planning guidance) and commission research to assess how effectively the duty to co-operate is helping the delivery of national</p>	<p>Comments noted.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the duty to co-operate should be one of the priority areas on which the Government should consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and were published on 21 December 2012 for an 8 week consultation. The Government is considering the consultation responses before responding to the Group's recommendations.</p>

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		outcomes such renewable energy infrastructure.	
25	Reliance on the National Planning Policy Framework and the duty to co-operate	<p>Countryside Council for Wales were concerned that no consideration of, and no examples have been provided in respect of, cross boundary working between England and Wales.</p> <p>The Countryside Council for Wales consider that reference to National Planning Policy Framework does not apply in Wales and ‘presumption in favour of sustainable development’ does not apply to European Sites such as the Severn Estuary Special area of Conservation/Special Protected Area/Ramsar. Therefore it may not always be appropriate to rely on the National Planning Policy Framework as mitigation.</p> <p>Similarly, the duty to co-operate amongst English authorities may not require cooperation across the boundaries of devolved administrations and/or with other competent authorities and consultant bodies including Countryside Council for Wales. They sought clarification over what safeguards are in place to ensure that environmental damage will not occur</p>	<p>Comment noted.</p> <p>The National Planning Policy Framework applies to English authorities and requires authorities to produce local plans and make planning decisions in line with the requirements of the Framework. The policies in the Framework set the framework for sustainable development in England. In Wales land use planning policy guidance is set out in two core documents, "Planning Policy Wales" and "Minerals Planning Policy Wales". These documents are supported by topic based Technical Advice Notes (Wales). Circulars and Circular letters provide advice and guidance on specific topics.</p> <p>Since the assessment process is aimed at assessing the implications of revoking policies that only apply in England, it is reasonable to consider the policy and legislative framework that will remain in place, at national and local level in England, should the Regional Strategy be revoked. The application of policy and legislation, for instance on water resources</p>

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		<p>in the period until duty to co-operate becomes an integral part of plan preparation. They consider there is uncertainty as to how the duty co-operate can address strategic issues particularly in the context of cross border issues with devolved administrations.</p> <p>Countryside Council for Wales query the application of the principles of localism as 'mitigation' for resolving local environmental capacity issues at the regional and strategic level, rather than local, level. They consider the planning of development which may be dependent on 'strategic' natural resources is best considered at the strategic and/or regional level. Policies which form the framework for development and determine options for spatial distribution and magnitude of development should be considered in the context of essential environmental goods and services and not by administrative boundaries.</p>	<p>management, can mitigate impacts in Wales if the impact is transboundary. In the case of water supply, separate legislation and policy in place which sits outside the planning system. Local plans are subject to Strategic Environmental Assessment which requires local authorities to assess the potential environmental effects of their plans. Certain planning decisions are also subject to the requirements of the Environmental Impact Assessment Directive. Local plans and planning decisions are subject to the requirements of the Habitats Directive. As part of this process English local authorities are required to consult statutory consultees on the potential impacts of their plans through the Strategic Environmental Assessment, and Habitats Regulations Assessment process including bodies in Wales as appropriate.</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004/1633) require local authorities and other public bodies to assess the potential environmental effects of their plans in</p>

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			<p>compliance with the Strategic Environmental Assessment Directive (2001/42/EC). The Regulations impose duties to consult certain bodies during the process, including the devolved administrations and their nature conservation agencies (the Countryside Council for Wales, in relation to such part of a plan as relates to Wales). Government guidance emphasises the need to consult the consultation bodies and the public in any part of the UK significantly affected by a plan or programme in another part of the UK (A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, September 2005), para 3.2).</p> <p>The Conservation of Habitats and Species Regulations 2010 (S.I. 2010/490), commonly referred to as the Habitats Regulations, impose further duties on local authorities to protect 'European sites' designated under the Wild Birds and Habitats Directives (79/409/EEC, now codified in 2009/147/EC, and 92/43/EEC). For example, under regulation 102 of the Habitats Regulations, plan-making authorities</p>

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			<p>including local planning authorities are required to carry out an 'appropriate assessment' where a land use plan is likely to have a significant effect on a European site and is not directly connected with or necessary to the management of the site. For the purposes of this assessment the 'appropriate nature conservation body' must be consulted (Natural England in relation to England and the Countryside Council for Wales in relation to Wales).</p> <p>Authorities are therefore required to consider the impacts of their plans on affected neighbouring authorities both in England and Wales as necessary.</p> <p>The duty to co-operate requires English authorities to co-operate in the drawing up of plans. Local plans are subject to the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework. Where local planning authorities have failed to co-operate on cross boundary matters, it is also likely that their Local Plan will not be deliverable and as such it may be found unsound.</p>

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			<p>There is a tradition of collaborative planning between English and Welsh local planning authorities. The Planning and Compulsory Purchase Act 2004 (section 64(5)(a) which applies to Wales only) states that the purpose of an independent examination is to determine whether a Local Development Plan is sound. Guidance in the form of The Local Development Plans Wales 2005 sets out a number of tests of soundness, to be tested at examination by an independent Inspector. Specifically Test C1 facilitates a collaborative approach to local plan making between local authorities by stating if a plan is to be found sound, "C1: it is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas", this test on Welsh local planning authorities extends beyond their Welsh neighbouring authorities to include English authorities where they share a boundary. The National Planning Policy Framework and duty to co-operate covers English local planning authorities only, but this is not an obstacle to any English authority working with its Welsh counterparts. In South West Wales</p>

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			<p>Monmouthshire's Local Development Plan which is programmed to commence formal hearings in April 2013, their neighbouring English authority the Forest of Dean has been consulted on this emerging local plan, in particular regarding the role that Chepstow plays in the urban hierarchy of the sub region covered by Monmouthshire and Gloucestershire. The duty to co-operate covers English local planning authorities only, it does not extend to neighbouring Welsh authorities, however this is not an obstacle to any English authority working with its Welsh counterparts.</p> <p>The Welsh Assembly Government also plays a strategic planning role by participating in Local Development Plan examinations in Wales and where they identify cross boundary issues they raise them and also alert Welsh local authorities to cross boundary planning issues at the early stage of plan preparation. Beyond the English and Welsh statutory planning system, there are also initiatives like the Severn Estuary Partnership set up in 1995 to focus the activities of English and Welsh local authorities, English and Welsh statutory authorities and</p>

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			<p>interested parties, bringing together all those involved in the development, management and use of the Severn Estuary within a framework which encourages the integration of their interests and responsibilities to achieve common objectives for the management and development of the estuary. Again River Basin Management Plans, because they are based on river basin water sheds, cross local authority boundaries including the boundaries of England and Wales, and so provide a vehicle for strategic planning.</p>
26	Monitoring	<p>Dorset County Council believe the proposals for monitoring do not appear to address the changes that the Government has introduced through the Localism Act to monitoring requirements. They consider that there is a risk that consistent collection and coordination of data, to provide an overview above local authority level, could be lost, with implications for the environment. There needs to be greater certainty about the frequency and thoroughness of the monitoring measures proposed to fully address the Strategic Environmental</p>	<p>Comments noted.</p> <p>The National Planning Policy Framework (paragraphs 126 – 141) illustrate the key role which local planning authorities have through the development management decisions they take and local plans they prepare in conserving and enhancing the historic environment. Naturally local planning authorities will wish to monitor the impact of the planning system upon the conservation and enhancement of the historic environment in their localities as well as cumulative effects on issues such as climate</p>

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		<p>Assessment requirements.</p> <p>Town and Country Planning Association welcomes the identification of proposed monitoring indicators (Table NTS4) but seek clarification on how this information will be brought together and where it will be published.</p> <p>Campaign to Protect Rural England are disappointed that the monitoring proposals in Section 5.2 of the updated Environmental Report does not address the assumption that the duty co-operate will deliver strategic planning, and feel strongly that this should be a key monitoring indicator.</p>	<p>change, water quality and water resource. Local planning authorities must report on their performance against the duty to co-operate in their monitoring reports.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan to revoke the South West Regional Strategy are set out in this Post Adoption Statement.</p> <p>Local planning authorities have to produce an annual monitoring report on the implementation of their local plan, this data can be used to flag up the need to review policies within their local plan. If local planning authorities working collaboratively wish to pool their resources to produce joint local plan monitoring and annual reporting mechanisms they can do so.</p> <p>Section 5.2 of the updated Environmental Report refers to the specific monitoring actions for the department regarding the local plan making progress by authorities and on compliance with the duty to co-operate. In addition, the sources of information set out in Table 5.1 reflect those identified in the course of the gathering the evidence for this</p>

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		<p>RenewableUK welcomes the provisions on monitoring in the report, especially those for the monitoring of greenhouse gases, but the provision of renewable energy infrastructure needs to be monitored as well.</p> <p>English Heritage supports the proposed use of Heritage at Risk data but considers that a measure of engagement with historic environment issues within joint strategic planning arrangements should be included.</p> <p>Campaign to Protect Rural England also expected monitoring on key strategic indicators relating to the use of brownfield land over greenfield for development (given the loss of the 50% brownfield use regional target); and the impact on strategic transport planning (an</p>	<p>assessment, namely the review of plans, strategies and programmes and collation of baseline information. They are proposed in part to minimise any additional burdens. The information on these indicators are collated at frequent intervals to provide a continuing evidence base to analyse and monitor the effects of revocation of the Regional Strategy.</p> <p>The Government notes that RenewableUK welcomes the provisions which have been made on monitoring in the update Environmental Report and their request for provision of monitoring of renewable energy infrastructure, and from English Heritage about the use of the Heritage at Risk register.</p> <p>The Government agrees with the Campaign to Protect Rural England that monitoring could be extended to cover modal shift of transport, which may be captured through National Travel Survey statistics. Monitoring of brownfield land can also be achieved through the National Land</p>

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		assessment should be made of the impact on overall traffic levels and modal shift to more sustainable forms of transport).	Use database.
27	<p>Individual topics:</p> <p>Assessment of policy SS6 Other Designated Centres for Growth</p>	<p>Somerset County Council express concern at the findings in Appendix D regarding Regional Planning Guidance note 10 Policy SS6 that effects cannot be assessed, as in their view retention of Regional Planning Policy Guidance 10 policies could lead to conclusions of significant positive effects on the populations of the Camborne/Redruth area, and from reduction in the need to travel.</p> <p>The section on revocation may be incomplete, in that whilst negative effects have been assessed, positive effects of commuting in the region's settlements are not set out.</p>	<p>Comments noted.</p> <p>The assessment of Regional Planning Guidance note 10 Policy SS6 in Appendix D considered that the impacts of revocation on biodiversity, soil, water, material assets, cultural heritage and landscape were uncertain since the future approach to the distribution of development in the region in respect of other centres for growth is unknown.</p> <p>In respect of transport, the assessment identifies that the retention of Regional Planning Guidance note 10 Policy SS6 would have a positive effect on air and climatic factors. The supporting commentary states that "Improving the correlation between jobs, housing and services in these settlements and restricting growth in settlements in close proximity to PUAs will reduce the need to travel and reliance on the car which in-turn may generate positive benefits in relation to human</p>

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		<p>Somerset County Council consider that the view reached of that “reliance on individual local authorities to deliver coordinated development of a scale which can realise opportunities for sustainable development” as an uncertainty would seem to contradict other sections of Appendix D, which sees some of the previous aspects of Regional Planning Guidance now being fulfilled through the duty to co-operate.</p>	<p>health, air quality and climatic factors although any existing problems of congestion and poor air quality may be exacerbated.” Under revocation, it is expected that these positive effect would continue and in consequence, effects against air and climatic factors have been assessed as positive. This is because the National Planning Policy Framework provides a strong policy framework for ensuring the vitality of town centres (paragraphs 23 - 27). It also seeks through the transport policies (paragraphs 29-41) to promote sustainable transport and support reductions in greenhouse gas emissions and congestion.</p> <p>The updated Environmental Report has highlighted that there is a degree of uncertainty with respect to how a localist approach will impact, for example, on sub-regional/regional growth. 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. However, it is expected that the broad spatial approach set out in Regional Planning Guidance note 10 will continue under</p>

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			<p>revocation. Further, whilst revocation removes a number of quantitative Regional Planning Guidance note 10 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, the updated Environmental Report highlights that revocation will provide clarity to local authorities in the region by removing the potentially confusing position created by the presence of outdated policy.</p> <p>Under revocation, and over the longer term, the updated Environmental Report highlights 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 Local Enterprise Partnerships to determine the regeneration needs of their areas and in this respect several authorities within the region</p>

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			(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.
28	Individual topics: Economic strategy	Somerset County Council support the acknowledgement in Section 5 of the updated Environment Report for the need for there to be a coordinated and collaborative approach to economic strategy (as also suggested by Lord Heseltine) to provide an enabling context for growth within wider geographic/regional areas.	Comment noted
29	Individual topics: Cultural Heritage	English Heritage notes that since the previous consultation the National Planning Policy Framework has been published, clarifying and strengthening the historic environment within the sustainable development agenda; in particular they welcome paragraph 7 of the Framework. English Heritage also notes that whilst the National Planning Policy Framework lacks the specificity of the Regional Strategy, it does embed the historic environment within sustainable development as a core planning	Comments noted. Paragraphs 126 – 141 of the National Planning Policy Framework illustrate the key role which local planning authorities have through the development management decisions they take and the local plans they prepare in conserving and enhancing the historic environment. English Heritage is identified as one of the bodies which local planning authorities through the duty to co-operate should work with when preparing their local plans. Working in liaison

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>principle.</p> <p>English Heritage consider that the analysis of cultural heritage in Appendix E (A.9) of the updated Environmental Report should better reflect that the National Planning Policy Framework lacks the distinctiveness of the regional strategy policies. It also considers that the need for liaison with English Heritage referred to in Section 9.7.1 of this Appendix should be extended to Section 9.8 on mitigation, where there are cumulative impacts and larger than local scale impacts.</p>	<p>with local planning authorities English Heritage can promote policies, which address the preservation and enhancement of the cultural and historical assets such as historical landscapes and settlements.</p> <p>Comment noted.</p> <p>Section 9 of Appendix E identified no significant negative environmental effects on the cultural heritage topic from revocation, hence no mitigation measures are proposed. However, the Post Adoption Statement will set out the proposed monitoring measures should the decision be to revoke the South West Regional Strategy.</p> <p>English Heritage already has considerable liaison with local planning authorities, including as a “named body” under the duty to co-operate, and as a statutory consultee in the preparation of local plans and for individual planning applications.</p>
30	<p>Individual topics:</p> <p>Renewable energy generation and Climate</p>	<p>RenewableUK consider that the loss of regional strategies will not be helpful in meeting the challenge of climate change and will affect the speed and effectiveness of reducing carbon</p>	<p>Disagree.</p> <p>It will be for local planning authorities to determine local responses to the issue of renewable energy generation consistent with</p>

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	<p>Change</p>	<p>dioxide emissions and renewable energy deployment at the local level. This will have an effect on the environment and human health and wellbeing.</p> <p>The removal of valuable information and guidance contained in Planning Policy Statement 22 on Renewable Energy is also affecting the ability of local planning authorities to plan for renewable energy infrastructure.</p> <p>RenewableUK challenge the view reached in the updated Environmental Report that revocation of the South West Regional Strategy will continue the overall trend of moving towards a low carbon economy, provided by current Regional Strategy policies. They consider that a reliance on national policy and the duty to co-operate is not sufficient to make sure that the UK meets its renewable energy generation and carbon emissions reduction targets. Despite this, the updated Environmental Report states there are no significant differences between revocation and retention.</p>	<p>the objectively assessed and up to date needs of their communities, following the guidance on such issues set out in the National Planning Policy Framework.</p> <p>The National Planning Policy Framework includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "...encourage the use of renewable resources (for example, by the development of renewable energy)". The National Planning Policy Framework makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>The National Planning Policy Framework also contains a number of policies aimed at encouraging the development of renewable energy installations including that local planning authorities should : "have a positive strategy to promote energy from renewable and low carbon sources; design their policies to</p>

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			<p>maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.” In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>RenewableUK consider that Regional Planning Guidance note 10 Policy RE6 (Energy Generation and Use) should be updated and retained to deliver the benefits arising from renewable energy deployment and climate change mitigation.</p> <p>EDF Energy consider that the Strategic Environmental Assessment has shown that positive benefits on climate change would be</p>	<p>National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.</p> <p>Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>Disagree.</p> <p>As noted in the updated Environmental Report, Regional Planning Guidance note 10 Policy RE6 is outdated. Further, 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, or its constituent parts (such as Regional Planning Guidance note 10 Policy RE6).</p> <p>Comment noted.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>maintained along with other benefits for population/health and water by revoking the South West Regional Strategy. They also recognise the role that smaller scale energy infrastructure may play on meeting Government energy and climate change objectives, and so welcome the integration and consolidation of policies that help to promote the objectives of the Framework.</p> <p>The Town and Country Planning Association consider that the acknowledgement in the updated Environmental Report that 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, particularly applies to the South West where the associated revocation of so many saved structure plan policies will leave some districts with no local policy on such issues, until revised local plans are prepared.</p>	<p>Comment noted.</p> <p>The updated Environmental Report highlights that a number of issues are arguably more efficiently and effectively addressed across wider areas than local authority boundaries including , in particular, major infrastructure provision, biodiversity planning, climate change mitigation and adaptation, and renewable energy. However, in respect of the South West region, the Report highlights that, as the majority of local plans within the region have been in place since Regional Planning Guidance 10, in the short term the regional planning framework will continue to be implemented alongside the National Planning Policy Framework. In the medium to long term,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>The Town and Country Planning Association question the Strategic Environmental Assessment's conclusion that there would be no difference between retention and revocation on the issue of material assets, since the Draft South West Regional Spatial Strategy was a pacesetter in positioning climate change at the centre of its strategy and as a driver of policy throughout.</p>	<p>the intent will be continued through other Government policy, notably the National Planning Policy Framework which provides strong policy direction on issues such as renewable energy and biodiversity.</p> <p>Further, whilst revocation of the Regional Strategy removes a number of quantitative policies contained within Regional Planning Guidance note 10, most 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.</p> <p>Comment noted.</p> <p>The draft revised Regional Spatial Strategy 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</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			sources. 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.
31	Individual topics – Green Belt	<p>Purbeck District Council advised that the Council had adopted the Purbeck Local Plan (Part 1) on 13 November 2012, so the South East Dorset Green Belt within Purbeck is now protected in an adopted statutory plan.</p> <p>Somerset County Council support the proposal in the Environment Report to retain the saved structure plan Policy 6: Bristol/Bath Green Belt from the Somerset and Exmoor National Park Joint Structure Plan Review (1991 - 2011: Adopted April 2000)_relating to the green belt in North East Somerset. They agree that removing this policy before Mendip District Council has adopted a Local Plan, which defines green belt boundaries, could put green belt land at risk from unwanted development. The current timetable indicates that the Local Plan should be set for</p>	Comments noted.

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>adoption in early 2014.</p> <p>Campaign to Protect Rural England welcomed the proposal to revoke the Regional Strategies that call for green belt reviews around those principal urban areas that have them, which removes a significant potential environmental effect.</p>	

ANNEX C

Monitoring Indicators

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

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Condition of designated sites • Threatened habitats and species • Populations of countryside birds • Surface water biological indicators 	<p>Joint Nature Conservation Committee report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p>Joint Nature Conservation Committee http://www.jncc.gov.uk/page-4241 http://jncc.defra.gov.uk/page-4239 http://jncc.defra.gov.uk/page-4238 http://jncc.defra.gov.uk/page-4235 http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</p> <p>Department for Environment, Food and Rural Affairs (Defra) http://www.defra.gov.uk/statistics/environment/inland-water/</p> <p>The Environment Agency (EA) are responsible for monitoring water quality under the Water Framework Directive</p> <p>Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf (Indicators 3a and 3b)</p> <p>And</p> <p>State of the Environment Report in Wales http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf (Indicators 19 and 21)</p>
Population	Annual (where information allows) trends	<p>Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added</p> <p>Department for Communities and Local Government statistics:</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	in: Employment Information Population Housing and additional net dwellings Local plan making progress and the duty to co-operate Traffic levels Modal shift to sustainable forms of transport	Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region The Department for Communities and Local Government Business Plan monitoring Department for Transport National Travel Survey
Human Health	Annual (where information allows) trends in: National Statistics – Long term illness, etc. Crime Deprivation Access to and quality of the local environment	Office for National Statistics on health Home Office, Crime Survey for England and Wales Department for Communities and Local Government statistics: Indices of Deprivation Office for National Statistics (proposed measures of wellbeing)
Soil and Geology	Annual (where information n allows) trends in: Land use	Department for Communities and Local Government statistics Department for Environment, Food and Rural Affairs

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
		http://magic.defra.gov.uk/
Water	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> % of catchments with good ecological status Water resource availability Per capita water consumption Number of water resource zones in deficit 	<p>The Environment Agency and the Department for Environment, Food and Rural Affairs. http://www.defra.gov.uk/statistics/environment/inland-water/</p> <p>Water Resource Plans (available every 5 years) from Severn Bristol water, Sembcorp Bournemouth water, Severn Trent Water, South West Water, Wessex Water and Cholderton and District Water Company</p> <p>For Wales Water Resource Plans (available every 5 years) from Welsh Water, Severn Trent Water and Dee Valley Water</p> <p>Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf (Indicator 15)</p> <p>And</p> <p>State of the Environment Report in Wales http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf (Indicators 13b, 35c and 36c)</p>
Air	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Number of Air Quality Management Areas • Number of Air Quality Management Areas were exceedances 	<p>Department for Environment, Food and Rural Affairs</p> <p>Department for Environment, Food and Rural Affairs</p> <p>Welsh Government http://wales.gov.uk/?lang=en State of the Environment Report in Wales</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	occurred.	http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf (Indicators 33a, 33c and 33j) Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf (Indicators 11 and 12)
Climatic factors	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Emission of greenhouse gases • Installed capacity of sites generating electricity from renewable sources (MW) • Number of properties at risk of flooding 	Department for Energy and Climate Change Statistical Release: Local and regional CO2 emissions Department for Energy and Climate Change Regional Renewable Statistics (from the RSTATS (Renewable Energy Statistics) database and REPD (the Renewable Energy Planning) database, https://restats.decc.gov.uk/cms/welcome-to-the-restats-website/ Environment Agency
Material Assets	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Volume of construction waste and proportions recycled • Volume of hazardous 	Environment Agency Environment Agency

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

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	area <ul style="list-style-type: none"> • Trend in number of vacant dwellings 	Countryside Council for Wales (Natural Resource Wales) http://landmap.ccw.gov.uk/ .