



**East Midlands Regional Plan Sustainability Appraisal**  
**Sustainability Appraisal Statement**  
**Prepared for the Government Office for the East Midlands**

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#### **VERSION CONTROL RECORD**

<b>ISSUE</b>	<b>DESCRIPTION OF STATUS</b>	<b>DATE</b>	<b>REVIEWER INITIALS</b>	<b>AUTHORS INITIALS</b>
A	First Internal Draft	07/08/2008		EJ
B	Second Internal Draft	21/12/08		EJ
1	First Client Final	02/02/09	JC	EJ
2	FINAL DRAFT	06/03/09	JC	EJ



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## **CONTENTS**

	<i>Page</i>
<b>1 INTRODUCTION</b>	<b>1</b>
<b>2 THE REGIONAL PLAN AND SUSTAINABILITY</b>	<b>3</b>
2.1 THE REGIONAL PLAN AND SA PROCESSES	3
2.2 WHO CARRIED OUT THE SA?	4
2.3 THE RSS AND SUSTAINABILITY	4
<b>3 CONSULTATION</b>	<b>20</b>
<b>4 MONITORING</b>	<b>31</b>

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## 1 INTRODUCTION

This document is the Sustainability Appraisal (SA) Statement which has been prepared to support the East Midlands Regional Plan (March 2009). This SA statement is published in accordance with the SEA Regulations (*Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes*). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.

PPS11 (technical amendments, 2009) gives further guidance specifically for Regional Spatial Strategies stating that “*Either at the front of the SA report or as a separate document there must be a statement required by regulation 16(4) of the Environmental Assessment of Plans and Programmes Regulation 2004 and referred to in this PPS as the “SA statement”, agreed by the Secretary of State and the RPB.*”

The SEA Regulations set out the particulars that should be covered by the statement as follows:

- How environmental (sustainability) considerations have been integrated into the RSS;
- How the Environmental (SA) Report has been taken into account;
- How opinions expressed in response to consultation have been taken into account;
- The reasons for choosing the RSS as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the RSS.

To reflect these requirements, the format of this statement is as follows:

- Section 2, Background: A brief background to the SA process undertaken on the East Midlands Regional Plan and how environmental and sustainability considerations (and especially the results of the SA and the assessment of alternatives) have influenced the process;
- Section 3, Consultation: How comments from the public and statutory consultees on the SA have been taken into account;
- Section 4, Monitoring: What measures will be taken to monitor the sustainability of the East Midlands Regional Plan.

Please note that ENVIRON have only been responsible for the SA process from the Proposed Changes of the RSS onwards. Therefore, when reporting on the earlier stages of the SA, ENVIRON

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has had to rely on information made available by other parties and information which is currently in the public domain. Therefore ENVIRON cannot be held responsible for the accuracy or the comprehensiveness of this information.

## 2 THE REGIONAL PLAN AND SUSTAINABILITY

### 2.1 THE REGIONAL PLAN AND SA PROCESSES

The Regional Plan and related SA processes have been outlined in Table 1 below:

**Table 1: Regional Plan and SA Process**

RSS Stages	SA Activity	SA Deliverable
Stage 1: Identify the issues for a revision and prepare a project plan, including a statement of public participation	Scoping	<i>Interim SA Data Report</i> (February 2005) produced by LUC and GHK.  <i>SA Scoping Report</i> (May 2005) produced by LUC and GHK.
Stage 2: Develop options and policies, taking account of assessed effects, and develop the draft revision	A) Sustainability Appraisal of Options for Change document.  B) Sustainability Appraisal of Version 3A of the Draft Regional Plan.  Rapid reviews were also undertaken on versions 4A and 4B of the plan although formal reports were not produced.	A) Sustainability implications of each option was set out in the Regional Plan Options for Change document itself (published October 2005) rather than reproduced in a separate SA report.  B) <i>Draft Interim SA Report</i> produced by LUC and GHK and submitted to EMRA on 30 <sup>th</sup> June 2006.
Stage 3: Publish and formally consult on the draft RSS revision (The RSS Submission Draft was published in June 2005)	The Submission Draft RSS was subject to an appraisal of its significant sustainability effects.	<i>Sustainability Appraisal of the Draft East Midlands Regional Plan</i> (September 2006) produced by LUC and GHK.  In addition, appraisals of the sub regional elements of the plan were prepared by the Section 4(4) Authorities (or by appointed consultants). These are reported in the following (details of the options appraisal carried out for the sub regional strategies is also outlined in these reports):  <i>Sustainability Appraisal of East Midlands Regional Plan – Three Cities sub regional strategy</i> (White Young Green, September 2006).  <i>East Midlands Regional Plan – Lincoln policy area sub regional strategy</i> (Lincolnshire County Council, September 2006).  <i>Sustainability Appraisal of East Midlands Regional Plan – Northern sub regional strategy</i> (White Young Green, September 2006).
Stage 4: Examination-in-Public <sup>1</sup>	NA	NA

<sup>1</sup> The Examination in Public considered the Submission Draft RSS in relation to the RSS tests of soundness i.e. whether it had been subject to a satisfactory SA and whether options were correctly considered in relation to SA.

<b>RSS Stages</b>	<b>SA Activity</b>	<b>SA Deliverable</b>
Stage 5: Publication of the Panel Report <sup>2</sup>	NA	NA
Stage 6: Consultation on the Secretary of State's Proposed Changes	The Secretary of State's proposed changes were subject to an appraisal of their significant sustainability effects	<i>East Midlands Regional Plan Sustainability Appraisal. Sustainability Report on RSS Proposed Changes</i> (ENVIRON, July 2008).
Stage 7: Issue of revised RSS	The final changes to the RSS were subject to an appraisal of their significant sustainability effects.	<i>East Midlands Regional Plan Consolidated SA Report</i> (ENVIRON, March, 2009).
Stage 8: Implementation, monitoring and review.	The SA monitoring indicators suggested as part of the SA report of final changes will be monitored as the RSS is implemented.	Set out in this SA statement.

The SA process has ensured the integration of environmental and sustainability considerations into the development of the plan both through assessment at key stages (represented by the published reports in the table above) and through less formal integration (see Section 2.3.2 for more details).

## **2.2 WHO CARRIED OUT THE SA?**

As can be seen from the table above different parties have been involved in carrying out the SA of the East Midlands regional Plan. LUC and GHK were contracted by the East Midlands Regional Assembly (EMRA) and were responsible for the sustainability appraisal process of Part 1 (general policies) of the plan up to (and including) the Submission Draft stage. The Section 4(4) authorities were responsible for the appraisal of Part 2 (Sub Regional Strategies) up to the Submission Draft stage.

At the end of 2007 in an open tender process, ENVIRON were contracted by the Government Office for the East Midlands (GOEM) and the Planning Inspectorate to undertake the SA from the Proposed Changes stage onwards including the provision of this SA statement. The appraisal work undertaken by ENVIRON encompasses both Part 1 and Part 2 of the plan.

## **2.3 THE RSS AND SUSTAINABILITY**

### **2.3.1 How sustainability issues have been integrated into the plan**

Regional Spatial Strategies have a statutory objective to contribute to the achievement of sustainable development (as set out in the Planning and Compulsory Purchase Act, 2004) and the East Midlands Regional Plan has integrated sustainability issues in a number of ways.

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The panel concluded that the SA informed the preparation of the draft strategy and were satisfied that the SA was a reasonably thorough exercise at a level of detail which is appropriate at the strategic level.

<sup>2</sup> *East Midlands Regional Plan. Examination in Public 22<sup>nd</sup> May – 19<sup>th</sup> July 2007. Report of the Panel November 2007.*

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A particular strength in the East Midlands is the consensus that has developed around a regional vision on how to achieve sustainable development. This vision has been developed through the Integrated Regional Strategy process. The vision states that:

*The East Midlands will be recognised as a Region with a high quality of life and strong healthy sustainable communities that thrives because of its vibrant economy, rich cultural and environmental diversity and the way it creatively addresses social inequalities, manages its resources and contributes to a safer, more inclusive society. In the next two decades development should be concentrated on the region's major urban areas, in ways that allow cities and towns to work together for mutual benefit while retaining their distinctive identity.*

The Regional Plan is also guided by a set of regional core objectives which cover the broad range of issues which can affect sustainability. These are set out as Policy 1 which also states that all strategies, plans and programmes should meet the core objectives.

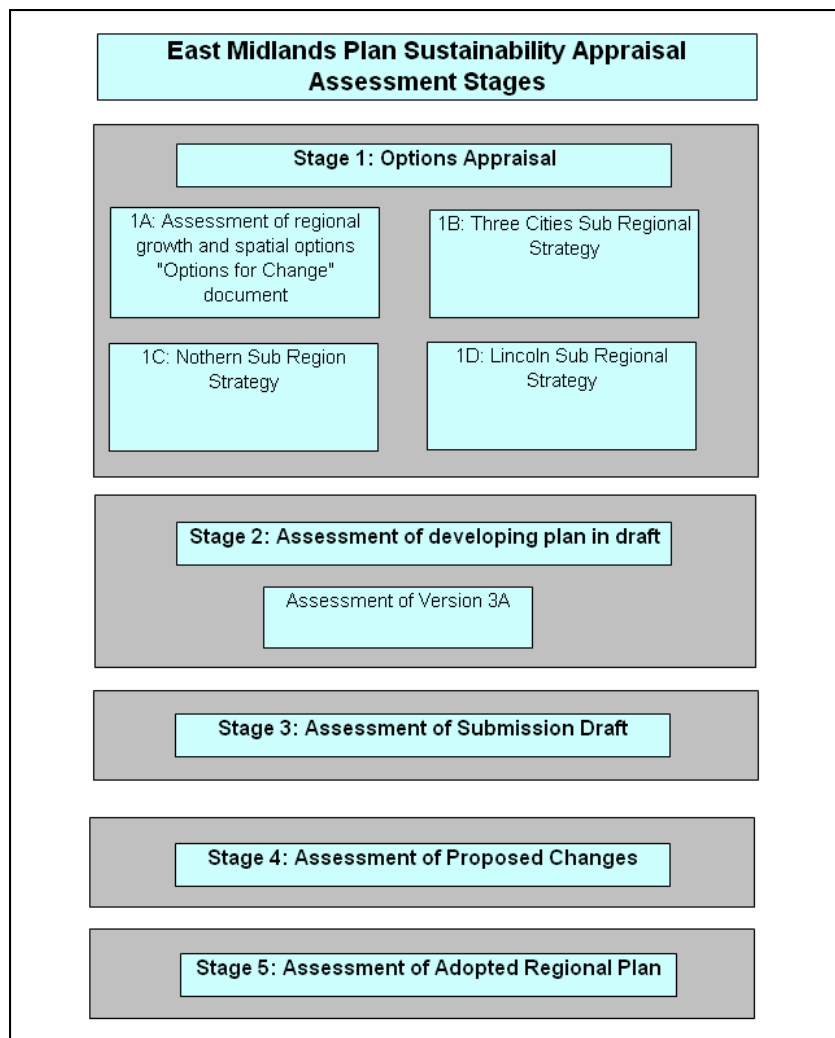
The sustainability of the plan can also be judged by the strategy that has been chosen to implement the above vision. The locational strategy set out in the Regional Plan is based on concentration of the majority of development in or adjoining the region's five Principal Urban Areas (Derby, Nottingham, Leicester, Lincoln and Northampton). Priorities then descend through the other growth towns and lastly to satisfy the needs of other sub-regional centres. The panel report stated that the policy of concentration is well supported in academic literature as the basis for supporting the maximum use of public transport, minimising CO<sub>2</sub> emissions and promoting access to urban facilities. The panel also were of the opinion that the Regional Plan plans adequately for rural areas through aiming to steer only development which is essential to the delivery of local needs to rural areas.

The panel report did sound a cautionary note, stating that in order to be truly sustainable, the policy of concentration needed to be supported by substantial development of urban public transport. There are a number of uncertainties related to the performance of the Regional Transport Strategy that make the delivery of this substantial investment unlikely through this plan period. This is an issue which will be tackled in the RSS review which is now underway.

### **2.3.2 How the SA has influenced the Regional Plan**

The SA process has contributed to plan development by providing an independent assessment of the potential effects of proposed options and policies as they were developed. It demonstrates that sustainability considerations have been incorporated into the development of the RSS and provides a formal assessment of the sustainability of the plan at various stages. In addition to formal input into the process, there was frequent and regular communication between EMRA officers preparing the

draft Regional Plan, the SA Steering Group and consultants undertaking the SA to debate issues and challenges as they arose (e.g. alternatives to be considered), share baseline information (e.g. maps) and discuss background to policy formation (e.g. housing distribution numbers). There has been close liaison with the statutory environmental bodies throughout. For example, environmental organisations in the region collaborated to produce a joint statement<sup>3</sup> on environmental capacity which helped to highlight key environmental capacity issues and how these might be taken into account within the policy framework of the Regional Plan. Figure 1 shows each of the assessment stages and the sections below show how the SA has influenced the Regional Plan at each key stage.



**Figure 1: Assessment Stages**

<sup>3</sup> Joint Statement in Relation to Environmental Capacity in the East Midlands (English Nature, the Countryside Agency (Landscape, Access and Recreation), the Environment Agency, English Heritage, the East Midlands Wildlife Trusts and East Midlands Environment Link (EMEL) (July 2006).

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## **Stage 1: Options Assessment**

### **Stage 1A: Options for Change Consultation (October 2005)**

The SA of the Options for Change Consultation<sup>4</sup> included two components: an appraisal of the Regional Plan objectives; and an appraisal of the housing growth and spatial options. This was the main stage at which reasonable alternatives were considered, as required by the SEA Directive. Further alternatives were considered in relation to individual policies of the Plan as it developed. To test for compatibility, a matrix was created plotting the SA objectives against the regional plan objectives.

The appraisal of Regional Plan objectives showed a number of synergies with SA objectives. Whilst no strong incompatibilities or inconsistencies were identified a small number of potential conflicts and uncertainties arose. Many of these centred on the amount, location and nature of new development proposed in the region and how this will affect the quality of the urban and rural environment. Table 6.1 in the September 2006 SA report shows the results of the appraisal of the Regional Plan objectives.

The SA noted the importance of matching housing provision with housing demand and employment growth in order to ensure Principal Urban Areas continue to develop as places where people want to live and work. The SA concluded that the higher the housing growth rate (Option 3, 20% above ODPM trend growth rather than Option 1, 20% below ODPM trend growth), the more likely that:

- Affordable housing will be delivered and house prices overall will increase more slowly (although consultation responses queried whether this would happen in practice).
- Homes built will increase faster than jobs are created, which could increase out-commuting from the region.
- Pressure will be put on environmental resources such as water and minerals, and on environmental assets such as wildlife and the landscape.
- Total CO<sub>2</sub> emissions and waste generated by the region will increase.
- Investment will be available for improvements to the environment, community facilities, transport and other infrastructure.

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<sup>4</sup> Review of the East Midlands Regional Plan to 2026. Options for Change (EMRA, October 2005).

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## **REASONS FOR SELECTING THE PREFERRED OPTION**

The Initial SA of the Options for Change document found that a key issue in determining the sustainability of the proposed distribution of development will be the alignment between jobs and homes. If this is out of alignment, then increased commuting is likely to result. This is a significant issue since, in percentage terms, the trend is for the number of jobs in the less developed east of the region to increase at a faster rate than the number of jobs in the more urbanised west of the region, even though the total number of jobs within the east will be considerably less than within the west. It was noted therefore that, whilst the Urban Concentration and Regeneration Option had many sustainability advantages, the success of such an approach would be highly dependent upon the success of economic policy intervention to foster economic growth in the Principal Urban Areas, and planning policy to strengthen demand in the Principal Urban Areas as places where people want to live and work. The Government announced in June 2006 that the following locations in the East Midlands would, in principle, be awarded Growth Point status:

- Leicester/Derby/Nottingham (the 'Three Cities').
- Lincoln, Grantham and Newark.

The Growth Points initiative will provide Government funding and support for local communities who wish to pursue large scale and sustainable growth, including new housing. As a result, figures for housing provision in the Regional Plan incorporated the scale and extent of growth anticipated in these locations. The SA highlighted the likely sustainability effects of each option, helping to inform decisions made by EMRA on the preferred options to be taken forward. The preferred option pursued for each Housing Market Area inevitably required balancing projected trends in household growth with the need to respect environmental capacity and balancing the advantages of strong urban concentration and regeneration, such as increased likelihood of delivering new services and facilities such as public transport, with the need to provide affordable housing in rural areas.

In EMRA's view, the Regional Plan provides the most sustainable approach to meeting the development needs of the Region, taking into account the full range of environmental, social and economic factors. It is a Plan that seeks to accommodate a significant increase in growth, but with strong policy safeguards to ensure that the quality of development delivered is of the high standard.

The full findings of the SA of the options for change document were presented in the 'Initial Sustainability of Options for Change' (LUC and GHK: October 2005). Following on from the selection of the preferred approach towards growth, the various sub regions tested the implications of accommodating the chosen level of growth in their areas. The results of these are presented below. Please note that the different appraisal teams for each of the sub-regions presented their results in slightly different ways and at varying levels of detail. As ENVIRON were not involved in the SA of the sub-regions we have only been able to report information that is already in the public domain.

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## **Stage 1B: Three Cities Sub Regional Strategy**

In preparing the 3-Cities SRS the six Local Planning Authorities developed a number of options for the location of housing development in the three Housing Market Areas within the sub region. For the purposes of the Sustainability Appraisal the following options were appraised using the Sustainability Appraisal framework:

- 0 - Do Nothing and promote development following RSS criteria;
- 1 - SRS to promote development in Principal Urban Areas and for local needs / urban consolidation / on small scale windfalls following RSS criteria;
- 2 - SRS to promote development in Principal Urban Areas / Sub Regional Centres (or Larger Main Towns) and for local needs / urban consolidation / on small scale windfalls following RSS criteria
- 3 - SRS to promote development in Principal Urban Areas / Sub Regional Centres / Other Main Towns and for local needs / urban consolidation / on small scale windfalls following RSS criteria
- 4 - SRS to promote development in Principal Urban Areas and permit development in other locations (including a new settlement) following RSS criteria.

The results of the options appraisal are shown below.

### **Derby**

- Options 1 and 4 were excluded on the basis that they did not accord with Policy 2 of the RSS (locational priorities for development);
- Option 2 would require an additional 10000 dwellings within the Derby PUA which would most likely take the form of urban extensions. This would increase pressure on the Green Belt; Green Wedges; other environmentally and culturally sensitive areas. It could also lead to development away from key transport corridors and in locations that are more difficult to serve by frequent and reliable public transport;
- Option 3 would require an additional 6800 dwellings within the Derby PUA and this is considered to be achievable without the release of Green Belt or large areas of Green Wedge; and
- Both Options 2 and 3 have transport implications but these are considered to be less acute under the preferred housing allocation.

### **Leicester**

- Options 1 / 3 / 4 were excluded on the basis that they did not accord with Policy 2 of the RSS (locational priorities for development);
- Under Option 2 provision of 620 dwellings per annum in the Leicester PUA would be required. This would place significant pressure on Green Wedges and other environmentally or culturally sensitive areas; there are also highways concerns about accommodating this level of development; and

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- Option 2 but with a slightly greater spread of development across the sub regional centres has been put forward as the preferred housing allocation. Investment in both transport and infrastructure will be required under this option.

### **Nottingham**

- Options 1 and 4 were excluded on the basis that they did not accord with Policy 2 of the RSS (locational priorities for development); and
- Option 3 was selected on the basis that it was regeneration focused. For example it opens up the opportunity for redevelopment of the collieries at Stanton and Cotgrave.

### **Stage 1C: Northern Sub Regional Strategy**

In preparing the Northern SRS a number of options were developed for the location of housing development in the three Housing Market Areas within the sub region. For the purposes of the Sustainability Appraisal the following options were appraised using the Sustainability Appraisal framework:

- 0 - Do Nothing and promote development following RSS criteria;
- 1 - SRS to promote development in and adjoining Sub Regional Centres and for local needs following RSS criteria;
- 2 - SRS to promote development in and adjoining Sub Regional Centres / regeneration based development in defined Other Urban Areas and for local needs following RSS criteria;
- 3 - SRS to promote development in and adjoining Sub Regional Centres / regeneration based development in defined Other Urban Areas and for local needs following RSS criteria PLUS permit employment regeneration based development in other locations where the public benefit arising from enhancing green infrastructure is significant; and
- 4 - SRS to promote development in and adjoining Sub Regional Centres / regeneration based development in defined Other Urban Areas and for local needs following RSS criteria PLUS permit regeneration based development in other locations.

The Sustainability Appraisal of the options identified a number of potential effects associated with the options both beneficial and adverse. The appraisal matrices were used to inform the preparation of the draft Northern SRS. Subsequently the approach that is as expressed in policies 1 and 2 of the Northern SRS was adopted, and in the dwelling allocations for the districts, as detailed in Section 6.2.2, based on the need to:

- Strengthen the roles of the sub regional centres;
- Promote the regeneration of smaller settlements in former mining areas in a way that promotes a more sustainable pattern of development; and
- Improve long term economic prospects.

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The following is a summary of the justification provided by Nottinghamshire and Derbyshire County Councils for their preferred approach:

### **Nottingham Outer HMA**

- The above trend dwelling allocation is intended to support the two growth point bids submitted for Mansfield – Ashfield and Newark;
- Growth point bids will need to address requirement for infrastructure investment, particularly in respect of water supply and treatment and transport infrastructure;
- Increasing levels of in-migration will be maintained by above trend dwelling allocation due to housing market renewal and town centre regeneration; continued growth should help lift job growth above the regional average;
- Considerable previously developed land is available for redevelopment and there are large scale opportunities for economic regeneration.

### **Northern HMA**

- Recent house building has generated high levels of in-migration which is considered unsustainable; settlement pattern is fragmented and there are concerns about the capacity of the area to accept large scale growth;
- The below trend dwelling allocation requires greenfield development but there are sensitive areas of landscape and Green Belt, including areas close to settlements;
- House building should not keep pace with job growth owing to out commuting concerns; and
- There are large scale opportunities for economic regeneration.

### **Stage 1D: Lincoln Sub Regional Strategy**

In preparing the LPA SRS, various spatial options for development in the sub-region have been appraised. There were 3 growth options identified:

- Commitment/urban capacity;
- 30% growth; and
- Super-growth option.

The results of this option assessment are not reported in the Lincoln SRS SA report so have not been reported here.

## Stage 2: Assessment of the developing plan in draft (Assessment of Version 3A of the Plan (June 2006))

The draft Interim Report produced in June 2006 provided an initial SA commentary for Version 3A of the draft Regional Plan. A number of the recommendations outlined in this report were taken on board in revised Versions of the draft Regional Plan. Key messages from the draft Interim Report are set out in Table 2.

**Table 2: Key Messages from Draft Interim SA Report**

SA Objective	Key Message from Interim SA Report
Objective 1: To ensure that the housing stock meets the housing needs of the region.	Insufficient detail to complete this appraisal.
Objective 2: To improve health and reduce health inequalities.	The draft Regional Plan is generally expected to result in positive effects on health. More emphasis could be placed on encouraging healthy lifestyles.
Objective 3: To provide better opportunities for people to value and enjoy the region's heritage and participate in cultural and recreational events.	Good range of policies recognising the value of the region's cultural assets.
Objective 4: To improve community safety, reduce crime and the fear of crime.	Policies in the draft Regional Plan are likely to result in positive effects on crime. Attention to the crime problems of Nottingham could be included in the East Midlands Regional Plan.
Objective 5: To promote and support the development of social capital across the region.	The majority of policies are expected to contribute positively to social capital in the region. There is a strong emphasis on regeneration in the draft Regional Plan which is expected to positively affect social capital. There could be more reference in the draft Regional Plan to the need to provide community facilities alongside development.
Objective 6: To increase biodiversity levels across the region.	There are a good range of policies in the draft Regional Plan covering biodiversity issues. There is a need for more explicit reference to Natura 2000 sites in the Strategy. There is a need to make reference to Biodiversity Conservation and Enhancement Areas. Policies need to recognise the need to help biodiversity to adapt to climate change.
Objective 7: To protect and enhance the rich diversity of the natural, cultural and built, environmental and archaeological assets of the region.	There are strong policies in the draft Regional Plan to protect the region's natural, cultural, built, environmental and archaeological assets. There may be a potential conflict between the protection and enhancement of the built environment and development pressures in the East Midlands. It may be difficult to achieve all of the aims set out in Policy 25: Protecting and Enhancing the Region's Natural and Cultural Assets. The impacts of transport development may adversely alter the landscape of the Region. The draft Regional Plan is likely to result in a reduction in the extent of tranquil areas in the Region.
Objective 8: To manage prudently the natural resources of the region, including water, air quality, soil and minerals.	Water resource capacity is a major concern in the Region. Sewage Treatment Works are at risk of a lack of capacity in the future in some areas of the Region. Many of the East Midlands Regional Plan policies are expected to have positive effects on soil in the Region, but potential loss of Best and Most Versatile Land is a concern in the Eastern Sub-Area. Large areas of the East Midlands are in zone 2 or 3 flood risk, although there are

SA Objective	Key Message from Interim SA Report
	<p>many areas which are adequately defended.</p> <p>There are a large number of policies in the draft Regional Plan that are likely to lead to improvements in air quality, but transport policies could go a lot further to reduce traffic, as this is the main cause of air pollution problems.</p>
<p>Objective 9: To minimise waste and increase the reuse and recycling of waste materials.</p>	<p>The targets of zero growth in waste by 2016 and recycling targets are welcomed but dependent on delivery.</p> <p>Need for guidance on the mix of waste treatment technologies to be pursued.</p> <p>Sub-Area guidance welcomed but need for a policy on the siting of waste management infrastructure.</p>
<p>Objective 10: To minimise energy usage and to develop the region's renewable energy resource, reducing dependency on non-renewable resources.</p>	<p>Some significant positive effects on energy are expected to arise from the implementation of the draft Regional Plan.</p> <p>A large number of significant negative effects on energy are likely to arise from the draft Regional Plan.</p> <p>The energy policy does not contain targets for energy reduction.</p> <p>Expanding the Nottingham East Midlands Airport is likely to have significant implications on energy use and greenhouse gas emissions.</p> <p>Climate change mitigation and adaptation are not well addressed in the Strategy.</p>
<p>Objective 11: To make efficient use of existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to ensure that all public transport journeys are undertaken by the most sustainable mode available.</p>	<p>Improvements to public transport services and modal shift for freight industry are welcomed.</p> <p>Reducing the need to travel needs to be at the heart of the Regional Plan.</p>
<p>Objective 12: To create high quality employment opportunities.</p>	<p>Policies in the draft Regional Plan are generally supportive of creating high quality employment opportunities.</p> <p>Policies in the Plan seek to accommodate rather than restrict growth in the Southern Sub-Area.</p> <p>The impact on rural areas is hard to assess.</p>
<p>Objective 13: To develop a strong culture of enterprise and innovation.</p>	<p>Policies are generally supportive of the objective to develop a strong culture of enterprise and innovation.</p>
<p>Objective 14: To provide the physical conditions for a modern economic structure, including infrastructure to support the use of new technologies.</p>	<p>Policies are generally supportive of the objective to provide the physical conditions for a modern economic structure.</p> <p>How far the policies provide land of the right type depends on whether there is any constraint on the property market.</p> <p>Structural change, the knowledge economy and expansion of office based activity implies that existing settlements are well suited.</p>

Version 3A was subsequently strengthened for the draft version. Key areas of the draft Regional Plan where improvements have been made since Version 3A are included in the box below.

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**KEY AREAS WHERE IMPROVEMENTS WERE MADE TO VERSION 3A**

- The need to develop green infrastructure is now highlighted extensively in the Regional Plan;
- The Plan aims for carbon neutrality in all development that requires an EIA, promotes operational carbon neutrality wherever practicable and aims to reduce energy demand;
- The Derwent Valley Mills World Heritage Site is given specific protection;
- The need to protect and enhance the historic and cultural assets and the countryside of the Region is better reflected within a number of policies of the Plan;
- The need to develop the rural economy is now given better coverage;
- Natura 2000 sites are given a significantly higher level of protection;
- Reference to Biodiversity Enhancement Areas and Biodiversity Conservation Areas, as outlined in the Regional Biodiversity Strategy, is now made in the supporting text;
- The Plan contains a significant amount of additional detail on water resources and water quality;
- Policy 35: A Regional Approach to Managing Flood Risk now specifically outlines Derby, Nottingham and Newark as priority areas for Strategic Flood Risk Assessments;
- Ambitious targets for renewable energy are now included in the Plan;
- Criteria for the location of waste management facilities are now included in the Plan; and
- Policy 41: Core Strategy and Regional Transport Objectives aims the rate of traffic growth to be reduced to at least zero by the end of the Plan period.

**Stage 3: SA of the Submission Draft Regional Plan (September 2006)**

The appraisal found that:

- Housing provision is likely to meet identified needs but there are uncertainties of delivery in relation to water resources and biodiversity;
- The draft Regional Plan is generally expected to result in positive effects on health but more emphasis could be placed on encouraging healthy lifestyles;
- There is a good range of policies recognising the value of the region's cultural assets but some aspects of housing and transport policies are likely to increase pressure on cultural assets and distinctiveness;
- There is a strong emphasis on regeneration in the draft Regional Plan which is expected to positively affect social capital;
- There are a good range of policies in the draft Regional Plan covering biodiversity issues and the protection of Natura 2000 sites is well covered in the Draft Regional Plan, although there are still some concerns relating to implementation. An Appropriate Assessment (AA) will ensure that negative effects on Natura 2000 sites are mitigated;
- Policies implicitly recognise the need to help biodiversity to adapt to climate change but local biodiversity could be given more consideration in the draft Regional Plan;
- There are strong policies in the draft Regional Plan to protect the region's natural, cultural, built, environmental and archaeological assets;

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- Whilst policies of the draft Regional Plan address the need for sustainable design and construction, the scale of development is likely to significantly affect the character of parts of the Region;
  - The impacts of transport development may adversely affect the landscape and historic and natural environment of the Region and the draft Regional Plan is likely to result in a reduction in the extent of ‘tranquil areas’ in the region;
  - The draft Regional Plan contains a strong policy on water resources and water quality but uncertainty remains in relation to maintaining a balanced supply and demand for water resources and sewerage treatment works are at risk of a lack of capacity in the future in some areas of the Region;
  - The draft Regional Plan moves towards increased secondary and recycled sources of aggregates but potential for sterilisation of mineral reserves remains;
  - There are a large number of policies in the draft Regional Plan that are likely to lead to improvements in air quality but there is concern relating to the trunk road and major highway priorities outlined in the draft Regional Plan;
  - The targets of zero growth in waste by 2016 and recycling targets are positive but dependent on delivery. Sub-Area guidance and policy on the siting of waste management infrastructure is welcomed;
  - The draft Regional Plan contains strong policies on working towards achieving carbon neutrality and sets ambitious renewable energy targets;
  - Proposed improvements to public transport services and modal shift for freight industry are welcomed but the detail behind the Plan needs to reflect the Plan’s good intentions and East Midlands Airport (EMA) proposals are likely to contribute to the effects of climate change;
  - Policies in the draft Regional Plan are generally supportive of creating high quality employment opportunities and seek to accommodate rather than restrict growth in the Southern Sub-Area; and
  - Policies are generally supportive of the objective to develop a strong culture of enterprise and innovation but how far the policies provide land of the right type depends on whether there is any constraint on the property market.

#### **Stage 4: Assessment of the Proposed Changes**

The Proposed Changes version of the plan has been written to respond mainly to the report of the Panel that undertook the Examination in Public of the Submission Draft Regional Plan (itself driven by the need to promote sustainable development within the region). A concerted effort has also been made to make changes to the plan to respond to the SA recommendations made by LUC and GHK in their report of September 2006. The main changes that have been made in the Proposed Changes version of the plan are:

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- A new strategy for the Lincolnshire Coastal Districts to take into account the coastal flooding issues in that area;
  - A new policy on air quality to address particularly the effects of air quality on internationally designated nature conservation sites;
  - A new policy on affordable rural housing to ensure that the good intentions of the plan are enshrined in policy;
  - A new policy on regional priorities for the economy to ensure that Local Authorities and other partners work together effectively;
  - Additions to Policy 1 and other policies to reflect climate change concerns;
  - Additions throughout the RSS in response to the Appropriate Assessment adding further safeguards to Natura 2000 sites;
  - Phasing of housing provision over 5 year periods;
  - Removal of site specific references to major locations for growth around Nottingham, Leicester and Lincoln;
  - The removal of Appendix 1 (Implementation Framework) from the plan with the requirement that it should be brought up to date and published as a regularly updated freestanding Implementation Plan;
  - Updated pitch requirements for gypsies and travellers
  - A new policy on strategic distribution recognising a previous gap in policy; and
  - Updating of the housing figures to take into account the 2004 household projections and concern about coastal flooding issues.

The appraisal undertaken by ENVIRON in June 2008 focused on the significant changes that had been made to the Regional Plan and found that on the whole the changes made in the Proposed Changes version of the plan made the plan a stronger one in terms of sustainability. Some of the key changes that were found to strengthen the plan included:

- Fuller coverage of environmental issues in the vision and objectives of the plan and in many of the policies;
- Better protection of Natura 2000 sites through additions to various policies and through the addition of a specific air quality policy;
- Fuller consideration of the effects of climate change including in the design policy and in the treatment of the Lincolnshire Coastal Districts;
- Better treatment of social objectives, for example the addition of a criterion on social infrastructure to the Northern Sub –Area policy, the inclusion of a policy on rural affordable housing and an increase in pitch provision for gypsies and travellers;

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- Further strengthening of policies on the economy, for example the new policy on Regional Priorities for the Economy and the addition of a clause to the regeneration policies that regeneration should conform to the locational strategy of the plan; and
  - Sub regional issues - A stronger policy on identification of land surrounding Nottingham and the removal of named growth quadrants for Lincoln leaving more discretion at the local level.

However, there were still some areas of the plan where the risk of significant sustainability issues remained. Some of these can be dealt with before the plan is finalised and some are considerations for the next Regional Plan. These are:

- The design policy has been significantly changed and in some areas weakened. The policy would be stronger in sustainability terms if it required all major development to achieve the highest viable level of building sustainability, rather than only urban extensions. It would also be stronger in sustainability terms if the policy included a requirement for major developments to secure 10% of their energy from decentralised, renewable or low carbon sources (this is currently included in the supporting text but would be clearer if it was in policy);
- The SA still recognises that even with 25% water savings, water resources and STW capacity restrictions may still restrict development in some areas. Only the water companies and the Environment Agency can calculate whether housing provision figures can be accommodated in terms of water and sewerage capacity. Therefore, it will be important to consider changes to the policy dependent on their responses to the consultation. This is an issue which will also need to be dealt with through LDFs (informed by Water Cycle Studies);
- The RSS panel recognised that there was uncertainty regarding the deliverability of sustainable transport measures. An early review of the RTS is to begin shortly. It will be important for this review to prioritise public and other sustainable transport measures; and
- The focus of the plan in terms of regenerating peripheral areas is through improving accessibility. In the next review of the RSS, consideration should be given to alternative ways of regenerating peripheral areas that are more sustainable.

### **Stage 5: Assessment of the Final Regional Plan**

Out of the four points above, two were capable of being addressed through the wording in the final plan. These two points are:

- The desirability in the design policy of requiring all major development to achieve the highest viable level of building sustainability and the desirability of a requirement for major developments to secure 10% of their energy from decentralised, renewable or low carbon sources; and
- The risk that development in some areas will stretch the capacity of water resources and sewage treatment infrastructure.

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One of these issues has been resolved and one has not as discussed below.

The water issue has been resolved, not through changes to the plan itself but because the final version of the plan and the SA has been informed by the Draft Severn Trent and Anglian Water, Water Resource Management Plans (WRMPs). These set out the measures that will be needed to ensure that water resource provision is adequate until the period to 2035. The plans put forward a number of measures including a new Lincoln Water Treatment Works (WTW), a new source works at the Grove WTW, Lincolnshire Fens WTW and duplication of a section of the Derwent Valley Aqueduct. Additional consultation with the water companies on this specific issue has given the SA team confidence that as long as these measures are implemented, the levels of housing in the Regional Plan are sustainable. In terms of planning for sewerage infrastructure, consultation with the water companies have also made it clear that regional and local bodies will need to work together to ensure timely provision of appropriate additional infrastructure for water supply and wastewater treatment and this has now been built into Policy 32.

With regards to the design policy, the decision was made by the Government Office for the East Midlands not to make the changes suggested by the SA. The recommendation to extend the requirement for the highest level of building sustainability to all major developments is considered by GOEM to be a national issue which should therefore be co-ordinated at a national rather than the regional level. It was considered that there was not sufficient evidence to justify the need for a separate regional requirement. However, the draft RSS had related this requirement to urban extensions and this was retained in the amended policy included in the Proposed Changes. It is also set out in the Climate Change PPS that specific requirements related to the Code for Sustainable Homes and BREEAM should be put in place at the local level. With regards to the 10% on-site generation from renewable sources this is covered in supporting text rather than policy because while the Government accepts the principle, specific levels need to be evidenced based and are therefore more appropriately set at the local level (para. 26 of Climate Change PPS).

Therefore, there are still some areas of uncertainty or areas of the plan where the risks of potential negative sustainability issues remain (especially if action is not taken at other levels within the planning hierarchy). These are:

- The design policy has been significantly changed and would be stronger in sustainability terms if it required all major development to achieve the highest viable level of building sustainability, rather than only urban extensions. It would also be stronger in sustainability terms if the policy included a requirement for major developments to secure 10% of their energy from decentralised, renewable or low carbon sources (this is currently included in the supporting text but would be clearer if it was in policy);

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- The RSS panel recognised that there was uncertainty regarding the deliverability of sustainable transport measures. An early review of the RTS is to begin shortly. It will be important for this review to prioritise public and other sustainable transport measures; and
  - The focus of the plan in terms of regenerating peripheral areas is through improving accessibility. In the next review of the RSS, consideration should be given to alternative ways of regenerating peripheral areas to ensure that these areas are more sustainable.

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### 3 CONSULTATION

The SA statement should set out how responses from the consultation bodies and the public have been taken into account. The consultation requirements of the SEA Regulations are as follows:

- Authorities with environmental responsibility (Environment Agency, Natural England (previously Countryside Agency and English Nature) and English Heritage), herein referred to as the statutory consultees) shall be consulted when deciding on the scope and level of detail of the information which must be included in the Environmental Report; and
- Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before adoption of the plan or programme.

This section discusses the consultation that was undertaken on each stage of the SA reports and how these responses have been taken into account. Because of the sheer number of representations made on the SA this section is necessarily a summary of these responses. Please refer to the East Midlands Regional Assembly and Government Office East Midlands websites (<http://www.emra.gov.uk/> and <http://www.goem.gov.uk/>) for further details of these consultation processes.

**SA Scoping Stage:** The SEA Regulations state that authorities with environmental responsibility should be consulted on the scope and level of detail that should be included in the SA Reports. This was achieved through the production of and consultation on a SA scoping report that was produced by LUC and GHK in May 2005. Forty four comments were received on this report and as a result further work was carried out and changes were made to the SA framework. Appendix 4 of the SR sets out what these comments were and subsequent changes made. A summary of these comments is included below.

Comments on the SA scoping report mainly related to the adequacy and coverage of the SA framework and on the coverage of the baseline data and policy review. Comments were also made on the coverage of the regional plan itself and these were passed to the plan makers. The area where consultees had most influence on the development of the SA was in relation to the SA framework. Therefore, this summary has focused on these comments.

Extensive comments were made on the SA framework. The concern that the largest amount of respondents raised was in relation to the UK Sustainable Development Strategy (*Securing the Future*). Various consultees pointed out the fact that *Securing the Future* (The UK Sustainable Development

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Strategy) is a key document on which to base the SA framework. *Securing the future* was published the week the SA scoping report went to print, hence it wasn't referenced in the report. In response to consultee concerns, the SA framework was reviewed in the light of the principles in *Securing the future*.

Other consultees wanted a separate section on climate change to be included in the SA. The SA team considered the value of a specific objective on climate change during the preparation of the report and decided that climate change is an inherent effect of resource use and integrated resource management and should not be identified as a separate issue.

Many other changes to the SA framework were made in response to consultee comments. The main ones are listed below:

- An appraisal objective on the adaptation of biodiversity to climate change was added;
- An appraisal objective on the beneficial effects of flooding – e.g. on farmland was added;
- The sub-questions to the SA objective, *to provide better opportunities for people to value and enjoy the region's heritage and participate in cultural and recreational activities* were broadened to include access to sporting facilities;
- A sub question was added to the SA objective, *to manage prudently the natural resources of the region including water, air quality, soil and minerals*. The sub question reads *will it help achieve integrated catchment management, in line with the Water Framework Directive?*
- Under the transport section a sub question was added specifically on East-West links and air travel;
- In the energy section, a sub question has been added relating to energy conservation and energy efficiency;
- The need to enhance existing or provide new green infrastructure is now included under the SA objective, *to protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological assets of the region*.

**RSS Submission Draft:** A public consultation was held on the Submission Draft RSS and related SA Report from July to October 2005. 254 written responses were received from the public and consultees. A statement of public consultation was published by the North East Assembly that covered the RSS process up until the Submission Draft. There were a number of significant issues raised from the written responses and those relating specifically to the SA are discussed within the following text:

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A number of responses were received on the related SA Report. One of the main comments received was that the timing of the SA was not ideal as it was started after the RSS process had begun and this comment was also highlighted at the Examination in Public. However, representations made at the EIP by the statutory consultees made it clear that they felt that the SA process had adequately influenced the development of the RSS. Other comments made by the Environment Agency include the opinion that the RSS does not score well against the environmental objectives. When considering the impacts on purely the environmental objectives, only one positive impact on the environment has been identified and 14 negative impacts have been identified, 8 of which are strong negative impacts. The EA make the point that a separate environmental report would have made this transparent and at least given the opportunity to suggest mitigation. A separate environmental report was not deemed necessary as this goes against the Government guidance on SA which states that SEA and SA should be integrated. However, the RSS has been strengthened in terms of environmental issues through the Proposed Changes stage which has introduced new policies on climate change and air quality plus integrated the results of the Appropriate Assessment.

**Proposed Changes:** At the Proposed Changes stage a number of comments were made relating to the SA report. The comments and the SA team's responses are given in Table 3. Because these are relatively new comments and they have not appeared in any of the previous SA documentation, they have been reproduced in full rather than summarised.

Please note that the consultation on the Proposed Changes stage was the final stage of consultation.

**Table 3: Comments on the Proposed Changes SA Report**

Comment	SA team response
<b>Environment Agency (ID: 200684)</b>	
<p>Sustainability Appraisal, Paragraph 13.6 Natura 2000/ Designated sites: It is our consideration that the biodiversity objectives section of the Sustainability Appraisal is poorly drafted, although its conclusions are correct. We note the statement at paragraph 13.6 that it is "vital the Natura 2000 sites are not negatively affected". We believe that the same principle must also apply to other designated sites.</p>	<p>This particular comment refers to material that is a reproduction from the SA of the Submission Draft. However, we would agree with the sentiment and would argue that measures set up to protect international sites go some way to protecting other areas. We have set out a monitoring regime to identify impacts on biodiversity and this will help to reduce local impacts which the SA finds difficult to assess.</p>
<p>It is noted that Table 13.5 on Monitoring contains an Indicator "Condition of Biodiversity Conservation Areas". It will be very difficult to monitor change in the condition of BCAs as they are not homogenous and tend to consist of a number of different conservation sites within a matrix of farmed land.</p>	<p>We have not included this as an alternative indicator was not suggested.</p>
<b>Burton and Dalby Parish Council (ID: 198350)</b>	
<p>Poor sustainability rating is a key issue for us.</p>	<p>The SA team is unsure what this refers to.</p>
<b>Campaign to Protect Rural England (CPRE) East Midlands Regional Group (ID 198662)</b>	
<p>CPRE acknowledge the considerable work that has been undertaken in relation to this Sustainability Appraisal (SA) which contains a lot of useful data and analysis. CPRE also acknowledge the difficulties in assessing the impacts of incremental changes of broad-brush policies over a wide area. Overall the SA is a reasonable attempt to objectively qualify the impacts the Proposed Changes will have on the region. However our comments on gaps or problems in analysis and the way in which the conclusions have been presented in summary form are detailed below.</p>	<p>Noted</p>
<p>Deferring uncertainties to LDF stage is not sustainable. The SA acknowledges that there are a number of uncertainties in the assessment which means it is not possible to assess the effects of development at a local scale. For example the effects on biodiversity, landscape, cultural heritage as well as the capacity of water resources and sewage treatment. In some cases the uncertainty arises from implementation and the quality of the development delivered, and in others a lack of information at a local level or on the cumulative effects. However, rather than inferring from this uncertainty that development needs to be scaled back until it can be shown that negative impacts will not occur, the SA recommends, in many cases, that this will be dealt with through implementation, presumably through Local Development Framework plans. For example:          “The housing allocation for Lincoln and adjacent districts has increased by 67% making it more likely that a change in the character of the settlement could take place with development (depending on the proportion of this allocation that is placed in Lincoln). Maintaining Lincoln’s cultural distinctiveness will be highly dependent on effective delivery.” Pp91          “A number of areas which are sensitive in terms of cultural heritage are likely to see an increase in housing allocation in the Proposed Changes including Lincoln, Nottingham, Melton Mowbray, Market Harborough and Newark and the LDF Site Allocations process will be key in selecting sites that do not damage the character of the region.” Pp137          “Increasing development throughout the region is likely to have significant cumulative effects on the region’s built character along with</p>	<p>The SEA Regulations state that the report shall include the information as may reasonably be required taking account of          b) the content and level of detail in the plan or programme          d) the extent to which certain matters are more appropriately assessed at different levels...</p> <p>The SA does look at the spatial impacts to a certain degree but it is not possible to assess some detailed local impacts without having knowledge of the likely locations/sites where development is going to take place and this is why some aspects of sustainability can only be</p>

Comment	SA team response
<p>its landscape. The extent to which this effect is likely to be positive or negative will depend on the quality of development delivered.” Pp138</p> <p>While CPRE EMRG can appreciate the difficulties in assessing local and cumulative impacts, based on broad-brush policies at a regional scale, the problem in deferring the analysis of impacts to the LDF stage is that this will be too late. The housing targets will have been established for districts through the Regional Plan and will be difficult to amend or reduce at a local level without penalty to the planning authority, should local studies or assessments demonstrate that the level of development would create unsustainable environmental impacts. In many cases it may not be possible to find “the right site” and in some cases only a reduction in levels of development would serve to mitigate potentially adverse impacts.</p>	<p>examined at the LDF level. We believe that the LDF site allocations process is a key way of ensuring that the most sustainable sites are chosen. Also at the LDF level, more information is known about the quality of development delivered. LPAs have an opportunity to further test the sustainability of development levels at the more local stage.</p>
<p>Flawed assumptions on housing. In the SA of housing a number of fundamentally flawed assumptions are made. These include:</p> <ul style="list-style-type: none"> <li>a) that the Government’s household projections provide a reliable forecast of housing needs for the next 20 years</li> <li>b) that housing provision needs have to keep pace with household formation to ensure house price/income ratio is not exacerbated</li> <li>c) that more market housing will lead to more affordable housing being provided and vice versa</li> </ul> <p>Addressing these in turn:</p> <p>(a) CPRE EMRG’s response to the Proposed Changes consultation argues that there are several problems with the household projections in terms of reliability and consistency. We have commissioned an analysis of the validity and reliability of the 2004 household projections for the East Midlands. S. Custance Baker. 2008. An Assessment of House Building Projections for the East Midlands Region. Procon Computer Modelling, May 2008. Some of the key findings of that assessment were:</p> <p>Some of the basic data on which household projections are based are extremely uncertain (e.g. international immigration) or highly variable (e.g. inter-regional migration) making extrapolations 20 years in the future extremely tentative. The projections are also extremely sensitive to changes in certain variables (e.g. housing occupancy levels) which can lead to large differences depending on input assumptions.</p> <p>While CPRE acknowledges the need to build more houses, particularly affordable houses, it is possible that we may need many fewer houses in total than the Government’s figures. Our analysis shows that small changes in assumptions can lead to estimated figures as low as 285,000 or as high as 506,000 new homes between now and 2026. The point of this analysis is to demonstrate that projecting housing need 20 years into the future is at best, an inexact science, and at worst, an extremely misleading, and potentially damaging, policy guide.</p> <p>(b) There is very little empirical evidence of a relationship between levels of house building and house prices. The supply of new housing makes only a very small contribution to house price trends: typically new homes represent only 10% of the houses on the market at any time. There would need to be an extraordinary and unsustainable increase in house building to impact significantly on prevailing house prices. Analysis by CPRE has shown that the rate of dwelling completions in four selected areas of England bore no relation to house prices or affordability.</p> <p>The rise in house prices over the last few years was due to an increase in demand rather than a shortfall in supply. Demand factors include low interest rates, the unattractiveness of alternative investments (such as stocks and shares) and a boom in ‘buy to let’ properties in recent years. Likewise the recent fall in house prices is due to a shortage of credit and falling confidence in the economy. It has little to do with the level of house building. CPRE acknowledges there is still a problem with affordability, but we would argue this has much more to do with demand factors than supply, and linking housing provision to house price: income ratios is a red herring.</p> <p>(c) The SA acknowledges that this assumption has been challenged by several respondents in previous consultations on the regional plan. CPRE agrees there is an urgent need for increased supply of affordable homes for people who cannot afford homes on the open market.</p>	<p>It is the Government’s view that the housing projections are robust and based on the best available evidence.</p> <p>We acknowledged that more market housing does not necessarily lead to more affordable housing (in terms of the accepted meaning of the phrase affordable housing).</p> <p>However, inflationary pressures are likely to increase if housing demand outstrips housing supply – this is a basic economic tenet and will lead to more expensive homes in general. The RSS process cannot control housing demand but it can have some control over housing supply and the way that RSS plans for this is through using the household projections as a basis. The purpose of the SA is to set out what some of the sustainability implications are likely to be if the government raised housing supply to a certain level and we feel we have done this.</p> <p>The SA report stated that housing affordability was obviously not the only measure of sustainability – as well as housing affordability sustainability is also measured by improvements in quality of life and efficiency of resource use and the quality of the natural environment and we set this out clearly in the report.</p>

Comment	SA team response
<p>The current regional target is to build nearly 7,000 affordable homes a year. However, the region consistently fails to meet this target by a wide margin. In 2006-07 the number of new houses in the East Midlands was 22,025, exceeding the housing targets. By contrast the number of new affordable houses was only 2,513, some 4,026 short of the target. Levels of affordable housing have been significantly below target for many years suggesting that increasing levels of house building generally is not a guaranteed way to provide more affordable housing.</p> <p>The consequence of these flawed assumptions is that the Government’s housing projections are accepted at face value as being necessary to meet the first of the SA objectives, namely “To ensure that the housing stock meets the housing needs of the Region”. For example on pp75 the SA states “The Proposed Changes is also clearer in terms of Growth Points helping to ensure that they can assist in addressing the region’s housing objectives” and “The level and distribution of housing provision is likely to meet demand, including affordable housing needs and the needs of vulnerable groups.”</p>	
<p>Jobs/Homes analysis: The summary conclusions of the SA are that “The jobs homes analysis undertaken at the draft plan stage has been re-run and is similar in all regions, thus (in theory) minimising the risk of long distance commuting (subject to the uncertain performance of the RTS).”</p> <p>Table 7.1 on pp63/64 present an analysis of how dwelling provision corresponds to likely employment growth. However while the housing figures have been updated based on the (at the time) latest household projections, the employment figures are based on previous figures from the Experian model, up to 2016. Aside from the limitations of the Experian model itself, the recent downturn in the economy means that the employment figures will be seriously outdated. For example over the period 2001-2016 full time employment has been assumed to increase by 6.25% while the total number of dwellings is assumed to increase by 17%. The figures in the table should therefore be treated with considerable caution.</p> <p>The other problem with the analysis is that it is fairly broad brush at regional level and the numbers of additional new dwellings are a small proportion of the existing housing stock. However in certain locations, such as the new growth points, the additional new dwellings will be a much higher proportion of the overall housing stock. Coupled with the likely contraction in employment growth, the results at local level may be significantly different from the regional average.</p>	<p>We acknowledge the limitations of the Experian analysis in the SA report and advised that the results should be treated with caution. The information is provided as context. As we state in the SA report, the true relationship between job creation and household formation/need/demand is complex, reflecting a number of factors such as the population structure in different parts of the Region, the existing balance between jobs and homes, and travel to work patterns.</p>
<p>Inadequate assessment of impact on environmental services</p> <p>The SA does not fully consider the effect of growth and development associated with the housing provision in ‘Policy 13’ and sub-regional policies, e.g. ‘Policy Three Cities SRS 3’, on environmental services (termed Environmental Infrastructure in the plan). These services include green infrastructure; biodiversity; the productive capacity of soils on Grade 1, 2 and 3a land; ‘spongy landscapes’ and areas of tranquillity.</p> <p>Very little consideration is given in the SA and Proposed Changes to food and bio fuel production at a time of increasing demand for food, and non-food crops, mainly bio fuels.</p> <p>Further, no consideration is given to the extent of Environmental Stewardship on agricultural land: field margins and corners are often managed for the environment while the ‘field centre’ is managed for food (or non-food) production. Conventional production systems (for example, those based around spring cropping) have environmental benefits (provision of winter stubbles for birdlife) that will inevitably be reduced under the SRS 3 objectives. A Defra-led review of Environmental Stewardship, run jointly with Natural England, reports the following results for the end of November 2006.</p> <ul style="list-style-type: none"> <li>Forty percent of agricultural land, by area of holdings in England, is in either Entry Level Stewardship, Organic Entry Level Stewardship or Higher Level Stewardship</li> </ul>	<p>The SA has judged that policy 13 has appropriate safeguards in relation to key environmental issues and we do acknowledge that the increase in housing allocations will lead to an increase in pressure on some environmental resources, especially in the growth areas. We feel that we have adequately assessed the impacts of the plan on environmental services.</p> <p>The production of food and bio fuels is not within the remit of the RSS.</p> <p>Agriculture and environmental stewardship are not within the remit of RSS.</p>

Comment	SA team response
<ul style="list-style-type: none"> <li>• This represents approximately 3.7m hectares of land</li> <li>• Regionally, the highest levels of uptake of Entry Level Stewardship, the most widespread environmental scheme open to farmers, were in the East, East Midlands and North East</li> <li>• Cereal and Mixed Cropping farms had the largest number of holdings and area in Entry Level Stewardship; Cereal farms had the largest number of holdings and area in Higher Level Stewardship</li> <li>• Larger farms were more likely to join Entry Level Stewardship than smaller farms.</li> <li>• Cereal and Mixed Cropping farms are typical of the East Midlands landscape. Loss of ‘versatile’ (as discussed in Policy 26), more productive land will therefore be associated with a loss in other environmental services.</li> </ul> <p>To meaningfully meet the sustainability criteria outlined in the SA, the draft plan has to consider how growth and associated development will trade off against both environmentally- (e.g. biodiversity) and production- (e.g. food) based environmental services, on all land. The SA of the ‘Options for Change Consultation’ concluded that the higher the housing growth rate, the more likely that:</p> <ul style="list-style-type: none"> <li>• Pressure will be put on environmental resources such as water and minerals and on environmental assets such as wildlife and the landscape</li> <li>• Total CO<sub>2</sub> emissions and waste generated by the region will increase.</li> <li>• While these findings relate to an earlier stage of the SA process, they will clearly apply to the revised Proposed Changes, particularly as proposed housing numbers have been increased. As discussed above, environmental resources are found on productive, ‘conventional’ Cereal Farms. Often these farms are the larger, more commercial holdings. Environmental resources in the East Midlands are not confined to ‘protected’ areas, such as Natura 2000 sites.</li> </ul>	
<p>Climate Change: The SA concludes (p222) concludes that the Proposed Changes strengthen the plan by giving fuller consideration to climate change, and refers to the design policy and treatment of Lincolnshire coastal districts. However in relation to the design policy it states “It would be stronger in sustainability terms if it required all major development to achieve the highest viable level of building sustainability, rather than only urban extensions.” (pp218)</p> <p>CPRE consider it unlikely that CO<sub>2</sub> emissions will be reduced under the proposed levels of growth contained in the Proposed Changes, even where building sustainability is improved. In particular, as the SA notes, there is uncertainty regarding the deliverability of sustainable transport measures; this uncertainty was recognised by the Regional Spatial Strategy panel. The SA emphasises the need to prioritise public and other sustainable transport measures and CPRE fully support this finding.</p> <p>The Coastal Strategy for Lincolnshire also refers only to adaptation rather than mitigation. The SA also concludes that the plan has been strengthened in that it gives fuller coverage of environmental issues and the effects of climate change and better protection of Natura 2000 sites. However, as argued above, the plan does not consider the range of landscape services provided, in the main, by agricultural land in the East Midlands. In particular, it does not consider the effect on the region’s capacity to produce food or bio fuels or the environmental benefits of the widespread coverage of Environmental Stewardship within the East Midlands.</p>	<p>The production of food and bio fuels is not within the remit of the RSS. As the respondent points out the performance of the plan in relation to climate change was mixed and recommendations have been made that could strengthen the plan.</p> <p>The Coastal Strategy for Lincolnshire is a policy which is purely about how areas of Lincolnshire will cope with unavoidable climate changes so it is appropriate that it addresses only mitigation. Climate change mitigation is addressed elsewhere in the plan.</p>
<p>Economic infrastructure: In the SA of economic infrastructure, there is a discussion about the need for sustainable development (pp210) at the beginning. However the remainder of the chapter ignores this and focuses on GVA. It is also not clear whether or how the sub-questions on pp216 relating to the economic objective have been met.</p>	<p>The appraisal matrices analyse how each policy contributes to the sub-questions on pp216. We can endeavour to broaden out this summary in the final version of the plan.</p>
<p>Water resources/sewage treatment capacity: The SA is quite frank in its analysis on water resources/water quality. It acknowledges that</p>	<p>We agree that the figures should be provisional</p>

Comment	SA team response
<p>the environmental capacity has already been exceeded in some parts of the region.</p> <p>To the northeast of the region, the licensed surface or groundwater abstractions exceed the sustainable limit, potentially affecting rivers and wetlands. Severn Trent Water estimates that climate change could result in a further reduction of water yields of the River Trent and the Derwent valley reservoir system. (pp140)</p> <p>It also acknowledges that potential significant cumulative effects are expected to arise on water quality and water resources as a result of implementation of policies in the East Midlands Regional Plan.</p> <p>“Providing the housing allocation set out in the Plan in the locations specified whilst maintaining sufficient water resources and water quality may not be feasible.”</p> <p>And yet while the SA Summary Table on pp230 recognises that water resources and STW capacity may still restrict development in some areas, it states “This is an issue which will need to be dealt with through LDFs (informed by Water Cycle Studies) and the next round of the LDFs.”</p> <p>In other words, even though there are clear breaches of environmental capacity in some areas, and Water Cycle Studies, yet to be done, may reveal further capacity restraints, the level of development will not be restricted at regional level. While clearly detailed water cycle studies need to be done at local level, this means that any district figures provided in the Regional Plan must be provisional on the sustainability of that level of development.</p>	<p>in the LDFs until this issue is resolved and acknowledge this within the SA. “Should issues emerge, the scale and distribution of housing may need to be reviewed.”</p> <p>We were unable to provide information to the RSS process regarding what a sustainable level of housing would be in certain areas. This is information only water companies can provide and is further complicated by the fact that the situation is in a state of flux with new and expanded treatment works being planned. We have sought further information from the water companies and included this information in the Consolidated SA Report.</p>
<p>Summary tables: The summary Table 22.1 (pp218-222) does not seem to adequately reflect some of the conclusions from earlier parts of the report. To cite just three examples:</p> <p>“There are positive aspects in relation to reducing the risks associated with climate change e.g. Policy on the design of development, but this is overshadowed by transport policies which are likely to have an indirect negative effect.” (pp76).</p> <p>“However, increased development will inevitable lead to increased pressure on biodiversity in the region.” (pp120).</p> <p>“However, a number of the sub-regional policies may actually increase travel by car, particularly policies 51 and 52, negatively affecting air quality in the region.” Pp159</p> <p>“The level of development set out in the Plan and the locations of this development may not be sustainable in the long term. Locating development in areas of flood risk is likely to lead to cumulative significant negative effects on reducing the risk of flooding, and is likely to exacerbate it.” Pp159</p> <p>Yet these conclusions are not carried forward to the summary table which in relation to these issues suggest there are no significant concerns.</p>	<p>The summaries cannot contain everything.</p> <p>However, we will check the summaries and change where relevant.</p>
<p>The SA also draws some surprising conclusions, for example on the new policy on strategic distribution, the SA Summary Table states “It is expected to have positive implications for the economy, transport, congestion and air quality. The addition of a clause on environmental impact and European nature conservation sites is positive. “Yet there is no analysis to support this conclusion, nor are the potentially negative impacts of new strategic distribution sites in terms of some of the other strategic objectives of the plan acknowledged.</p>	<p>We do acknowledge in the appraisal tables that the policy could have negative impacts - 24 hour operation could have effects on noise and nuisance affecting health in nearby communities, Such a large development could have effects on the environment. Etc. the policy itself does address some of these issues.</p>
<p><b>Respondent from Grantham (ID: 198553)</b></p>	
<p>Whilst Policy 4 under 2 Spatial Strategy now covers Growth Points at Lincoln and Grantham it fails to promote the regeneration of the intervening villages that form the back-bone of the County. The future of the towns will always rely substantially on the prosperity of the</p>	<p>This is a matter for the plan makers.</p>

Comment	SA team response
<p>surrounding villages in what is primarily a rural area.</p> <p>3 Topic Based Priorities. Under 3.1.2. "encouraging provision in the most sustainable locations". The Appraisal of Sustainability of villages should be re-assessed on much wider criteria than at present. The spreadsheet on which a verdict of sustainability was far too narrowly drawn and totally ignores the many other facets of rural life. Many villages have home-based small and family businesses in highly skilled trades. Also locally organised social and entertainment functions based on close-knitted and long established family communities. The denial of the ability to maintain its population by the development of further affordable housing will see most of the "non-sustainable" villages "wither on the vine" and years of heritage and community investments fall into decay and obsolesce. No provision is made for the determination of planning applications of single and small house developments in villages, generally of affordable character. Many such locations were long in the pipeline when they were summarily dismissed on the introduction of the sustainability doctrine. Numerous financial personal hardships have arisen due to the apparently unheralded introduction of this policy.</p> <p>Suggested changes to the draft Plan:-</p> <ul style="list-style-type: none"> <li>• a clause to cover "the re-appraisal of village sustainability based on enlarged and locally relevant criteria".</li> <li>• a clause to cover "the continued consideration of planning applications of small affordable house units in all villages and hamlets irrespective of the proposed changes in sustainability policy".</li> </ul>	<p>The SA or RSS certainly does not seek to rule out development in villages and the RSS has been significantly strengthened in terms of rural affordable housing by the inclusion of the new policy 15.</p> <p>As part of the LDF process local settlement strategies will be assessed for their sustainability using locally relevant criteria.</p>
<p><b>Stapleford and Trowell Rural Action Group (ID: 184140)</b></p>	
<p>The question of sustainability is made on assumptions on deliverance of infrastructure and safeguards. experience shows that sustainability is great on paper but development plans never safeguard these. Suggested road, railway stations, shops, bus routes, doctor, schools, dentists may never materialize as there are no safeguards to these services and the infrastructure will become reality. In addition each area seems to be judged on its own sustainability. However, sustainability is seriously affected if two large developments are close together. This can not only affect the sustainability of the new developments but destroy existing communities. Whereas, selective small infill developments can improve communities, and naturally attract infrastructure currently missing, unfortunately large developers are not interested in small scale development or redevelopment. Within the study although covering flood risk. Development can be managed to limit and control and improve local flooding issues however, within the urban development areas these can have an affect on communities further away by overloading the watercourse and river network.</p> <p>The use of "affordable housing" ignores the need for social housing as affordable housing can become "trendy" and the value increases making the development un- affordable to locals especially in rural/ semi-rural communities.</p> <p>Sustainability appraisal should be carried out by persons with local knowledge as it appears from some studies that the appraisal is not based on reality and we can only presume that roads where appraised on school holidays, and wild presumptions are made.</p>	<p>We would agree that appropriate infrastructure is needed to make development sustainable. However, we have to make some assumptions within our assessment otherwise no developments would ever be judged as acceptable.</p> <p>The provision of infrastructure is managed through requirements in RSS, LDF and through the development control process. Where we feel that the RSS not been insistent enough in regards to infrastructure this has been pointed out in the assessment. A key example relates to sustainable design and construction.</p>
<p><b>Respondent from Gotham (ID: 186829)</b></p>	
<p>Box 1 Page 7: 'Rural areas are becoming increasingly inaccessible for those without a car due to the decline in public transport services and the closure of community and shopping facilities in smaller towns and villages.'</p> <p>As the opposite appears to be happening how does the Secretary of State propose to deal with this problem which is not covered in the East Midlands Regional Plan. Evermore village shops (in particular Post Offices) are being closed down. Public transport to villages does not cater for the travelling workforce. Local based small industrial sites being closed. All these issues the Government is fully aware of but does little to reverse the trend.</p>	<p>This is a matter for the plan makers</p>
<p>Box 1 'A significant amount of rental stock in Derby, Leicester and Nottingham is sub-standard ...'How does the Secretary of State</p>	<p>This is a matter for the plan makers</p>

Comment	SA team response
propose to ensure that Local Councils look and deal with the issue of raising the standard of the rental housing stock which would assist with the housing difficulties. There appears to be no mention within this document.	
Box 1 (Page 6) 'Primary Industries, such as agriculture ...' I comment again on the importance of Agricultural Land both worldwide, nationally and regionally. It is important to retain such land for the food it can provide in an era of global climate change and the economic recession the world has now entered. We will need 'home grown' to support the existing population in an economical/climate friendly way. I suggest that the protection of such land is not strong enough within this document.	This is a matter for the plan makers
<b>Gotham Parish Council (ID: 196879)</b>	
Overall Conclusions (page 19): Gotham Parish Council agree that the policy to achieve the highest level of building sustainability should be applied to all new building, and that we should not be reliant on eco-towns and urban extensions to advance improvements in building standards.	Noted
Box 1 (page 7) These points are well made and very valid. Gotham Parish Council can find no evidence in the East Midlands Regional Plan that these difficulties have been satisfactorily addressed unless the answer lies in Section 2: Spatial Strategy Paragraphs 2.1.8 (to which we have responded separately) and 2.1.9. GPC would like to bring to the attention of the Secretary of State that what is stated in the SA is correct, but what is actually happening is exactly the opposite of the counter-measures described by the Secretary in 2.1.9 as a 'prime objective'. There is no evidence of local planners supporting rural communities. The opposite is the norm. Gotham Parish Council urges the Secretary to ensure that this does indeed become a prime objective and that local authorities be made aware of it. There must be an immediate reversal in this trend if rural communities as we know them today are to survive, and certainly before more housing is built.	Noted  As already stated, the SA or RSS certainly does not seek to rule out development in villages and the RSS has been significantly strengthened in terms of rural affordable housing by the inclusion of the new policy 15.  As part of the LDF process local settlement strategies will be assessed for their sustainability using locally relevant criteria.
Box 1 (page 7): Gotham Parish Council can find nothing within the East Midlands Regional Plan that will improve the house price to income ratio of this area. We have stated elsewhere in our response that there is too much dependency within the Plan on the proposed development of East Midlands Airport bringing prosperity to the region. Very little is mentioned in the Plan for other sources of employment that will support what will be a massive influx of people. Opportunities with employers such as EMA and the satellite industries that feed off it are predominantly low-grade and low-paid. The construction of houses on the massive scale proposed might well increase the numbers of affordable houses, but the overall population of the area will be increased in parallel and with it will be another generation of people needing more affordable housing than is available. The house price to income ratio of this area will not be improved, and might even worsen. The statement that a significant amount of rental housing stock in Derby, Leicester and Nottingham is sub-standard is well made and agreed. It prompts the question: how does the East Midlands Regional Plan propose to ensure that Local Councils look at the issue of raising the standard of the rental housing stock?	This is a matter for the plan makers
Box 1 (page 6): In our response to Section 4 Policy Three Cities SRS2, Gotham Parish Council has brought to the attention of the Secretary the importance of Agricultural Land both nationally and to the region. It is important not only for the employment it sustains, but for the food it can provide in an era of global climate change. We agree that the external pressures to which the SA refers are very real, and we are concerned that the Secretary's proposed changes do	This is a matter for the plan makers

Comment	SA team response
<p>not impose sufficient resistance to them. We would like to see a far more robust statement from the Secretary to the effect that the sacrifice of Agricultural land should be resisted until it has been demonstrated beyond doubt that more preferable locations for development do not exist. In our response to Section 2 Spatial Strategy 3 paragraph (d), we have made clear our belief that other options do indeed exist.</p>	
<p><b>Respondent from Gotham (ID: 188847)</b></p>	
<p>We support the need to promote sustainable rural communities, but guidelines to local authorities, when preparing LDF plans that in-fill residential development, must not be ruled out completely, otherwise these communities will gradually die. The number of available sites will in no way affect the general thrust of the Regional Spatial Strategy, but local authorities have previously interpreted the principle of sustainability too literally.</p>	<p>This is a matter for the plan makers. We would agree, however, with the importance of defining sustainability in a local manner at the local level.</p>
<p><b>Respondent from Mansfield (ID: 181620)</b></p>	
<p>It is right and proper that the RSS promotes the re-use of previously developed land. However, we feel that a distinction needs to be made for land which has been previously developed, but is under a restoration condition. Take the example of a case of former colliery sites that are granted planning permission to become coal stocking and blending facilities for a period of time on the condition that the land is then restored to natural heathland and woodland, such as the Former Rufford Colliery site in Nottinghamshire. The RSS should make it clear that in these such circumstances the land should be treated as greenfield status and any impact assessments should be made against the state of the land as it would be when restorations are completed, as opposed to state of the land as it is prior to restoration. Similarly, opportunity costs should be factored in, for example in this case the fact that the land would not be restored as per its planning permission means that the area cannot be involved in plans for a regional park and the associated benefits of such inclusion. The RSS should be more sensitive to situations where the existing restoration condition is proving inadequate to either ensure restoration to heathland or woodland and subsequent inclusion in a Sherwood Forest Regional Park, or to prevent development which would have an irreversible negative environmental impact.</p>	<p>If a planning condition is in place on a site this would rule it out from being considered for housing or employment.</p>
<p>The Regional Waste Strategy estimates are not grounded in fact. Fact-based decision-making is important, and with quantities of household waste actually falling (in Nottinghamshire by some 12.6% over the past 3 years), decisions should not be based on incorrect and out of date estimates, such as those contained within the Regional Waste Strategy, i.e. estimates that wastes will continue to increase on average: MSW: 3.6% until 2006 and then 1.7% from 2007 to 2015</p>	<p>This is a matter for the plan makers.</p>

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## **4 MONITORING**

The SA statement should set out the measures to be taken to monitor the significant effects of the implementation of the plan or programme. The purpose of this monitoring is to identify unforeseen effects of the implementation of the plan. It is the responsibility of the East Midlands Regional Assembly as the Regional Planning Body to carry out this monitoring and review in liaison with Government Office East Midlands and other partners who have important roles to play in monitoring the progress of the RSS. Their roles should be co-ordinated by the Assembly in order that, where possible, a common evidential base is created and duplication avoided.

The East Midlands Regional Assembly will publish an Annual Monitoring Report (AMR), which will be submitted to the Secretary of State each year. The Annual Monitoring Report, together with Government's headline and good practice guide indicators will provide the context for measuring progress towards the key objectives of the Regional Plan.

The monitoring indicators chosen for the plan for each SA topic are shown in Table 4.

**Table 4: Monitoring Indicators**

<b>Effect that needs to be monitored</b>	<b>Indicators</b>
<b>SA Framework Objective 1: Meeting housing needs</b>	
Provides for those in housing need, taking into account relationships with neighbouring regions.	Housing trajectories
	Affordable housing completions by HMA areas
	Number of homeless people in the region
Reduces the risks of housing stock to the impacts of climate change.	Planning permissions granted contrary to Environment Agency advice on flood defence grounds
	Developments with Sustainable Urban Drainage Systems
	Strategic Flood Risk Assessments completed
	Houses damaged due to subsidence
<b>SA Framework Objective 2: Health</b>	
As no significant negative effects on health have been identified in the Sustainability Appraisal, proposals for monitoring have not been included. However, we recommend that levels of obesity continue to be monitored, along with health inequalities in the region.	
<b>SA Framework Objective 3: Access to and enjoyment of heritage, culture and recreation</b>	
Protects or enhances existing cultural assets.	Cases of damage to cultural assets and compensatory measures
	Number of Listed Buildings at risk
Promotes, celebrates and/or develops local and regional cultural distinctiveness and strengths.	% of people taking part in cultural activities
	% contribution of the cultural industries to the region's GDP.
<b>SA Framework Objective 4: Community safety and crime</b>	
As no significant negative effects on community safety and crime have been identified in the Sustainability Appraisal, proposals for monitoring have not been included.	
<b>SA Framework Objective 5: Social capital</b>	
As no significant negative effects on social capital have been identified in the Sustainability Appraisal, proposals for monitoring have not been included.	
<b>SA Framework Objective 6: Biodiversity</b>	
Helps to protect and enhance internationally designated sites and species e.g. SPAs, SACs and Ramsar sites.	Condition of Natura 2000 sites
	Change in areas of biodiversity of International significance
To help protect and enhance other designated sites e.g. SSSIs, County Wildlife Sites, LNRs etc.	Condition of land classified as Sites of Special Scientific Interest
	Condition of other designated sites
	Change in areas of sub-regional significance for biodiversity
Improves the condition of areas of biodiversity value	Change in areas of local biodiversity importance
	Condition of Biodiversity Conservation Areas (as identified in the East Midlands Biodiversity Strategy)
<b>SA Framework Objective 7: Protection and enhancement of natural, cultural and built environmental and archaeological assets</b>	
Protects and enhances the landscape quality and character.	% of region covered by Landscape Character Assessment
	Improvements in the condition of non-designated landscapes
Adversely affects designated landscapes.	Change in areas of designated landscapes
	Change in condition of designated landscapes
Enhances and manages the region's environmental infrastructure,	

<b>Effect that needs to be monitored</b>	<b>Indicators</b>
taking into account climate change.	
Reduces the extent of the region defined as 'tranquil'.	Reduction in areas defined as tranquil
<b>SA Framework Objective 8: Natural resources (water)</b>	
Reduces levels of pollution to water in the region.	Ecological river quality
	Number of pollution incidents reported to the Environment Agency
	Chemical water quality
	River Project Cover
Is within the capacity of available water resources, taking into account climate change.	Planning permissions granted against Environment Agency advice
	Number of leakages reported to water companies
<b>SA Framework Objective 8: Natural resources (soil)</b>	
Avoids the loss of, and damage to, the best and most versatile agricultural land.	Change in area of BMV agricultural land
	Change in condition of BMV agricultural land
Avoids the sterilisation of mineral reserves.	Areas of minerals sterilised by development
	Establishment of minerals consultation areas in Minerals Local Plans
<b>SA Framework Objective 8: Natural resources (natural hazards)</b>	
Reduces the effects of flooding, taking into account climate change.	Planning permissions granted contrary to Environment Agency advice on flood defence grounds
	Strategic Flood Risk Assessments completed
<b>SA Framework Objective 8: Natural resources (air)</b>	
Will it reduce levels of pollution to air in the region?	Number of Air Quality Management Areas in the region
<b>SA Framework Objective 9: Waste</b>	
As no significant negative effects on waste have been identified in the Sustainability Appraisal, proposals for monitoring have not been included. However, due to the challenges of reducing waste and delivering increased waste recycling, recovery and composting facilities, we recommend ongoing monitoring of waste production and the proportion of waste being sent to landfill and being recycled.	
<b>SA Framework Objective 10: Energy</b>	
Helps to minimise energy usage and encourage energy efficiency.	Domestic and Industrial/Commercial Energy Consumption
	New development compliant with BREEAM / Code for Sustainable Home standards
	Number of local authorities including requirements for on site renewable energy generation and Code for Sustainable Homes and BREEAM requirements
	Energy efficient construction
<b>SA Framework Objective 11: Transport and accessibility</b>	
Reduces the need to travel for those with the greatest barriers to travel.	Proximity of housing development to services, facilities and employment.
	Density of new housing
	% of region's new development in PUAs
Helps to reduce the distances people have to travel on a regular basis for education, employment and services.	Proximity of new housing development to education, services and employment.
Enables urban and rural users to gain equal access.	Relevant transport improvements in rural areas

<b>Effect that needs to be monitored</b>	<b>Indicators</b>
Reduces road congestion.	Scale of congestion in urban areas and on inter-regional routes
	Levels of traffic growth
Helps develop a transport network that minimises the impact on the environment.	Journeys made by cycle
	Level of bus and light rail patronage
	Journeys made on foot
	Punctuality and reliability of services
	New Public Transport Interchanges Developed
	% of passengers accessing EMA by public transport
	Development served by public transport
	No. of bus passenger journeys per year in rural areas
	No. of bus passenger journeys per year in urban areas
	Carbon Dioxide emissions
	Number and length of new cycle routes provided
Is robust enough to cope with the expected effects of climate change.	Planning permissions for transport infrastructure developments granted contrary to Environment Agency advice on flood defence grounds
	Transport infrastructure damaged due to subsidence
Encourages the use of locally sourced services and products in the economy.	
Further increases demand for air travel.	Number passengers using EMA
	Number passengers using airports in the region
<b>SA Framework Objective 12: Employment opportunities</b>	
As no significant negative effects on employment have been identified in the Sustainability Appraisal, proposals for monitoring have not been included. However, we recommend continued monitoring of a range of indicators for employment and the economy, as set out in the Annual Monitoring Report.	
<b>SA Framework Objective 13: Enterprise and innovation</b>	
As no significant negative effects on enterprise and innovation have been identified in the Sustainability Appraisal, proposals for monitoring have not been included. However, we recommend continued monitoring of a range of indicators for employment and the economy, as set out in the Annual Monitoring Report.	
<b>SA Framework Objective 14: Economic infrastructure</b>	
As no significant negative effects on modern economic structure have been identified in the Sustainability Appraisal, proposals for monitoring have not been included. However, we recommend continued monitoring of a range of indicators for employment and the economy, as set out in the Annual Monitoring Report	