

## Appendix K. RPIC report

Report to Yorkshire and Humber Assembly

### **Sustainability Appraisal and Strategic Environmental Assessment of the Regional Spatial Strategy for Yorkshire and the Humber: current status and next steps**

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Levett-Therivel  
sustainability consultants



Contact: Riki Therivel, tel/fax 01865 243488  
riki@levett-therivel.fsworld.co.uk 28A North Hinksey Lane, Oxford OX2 0LXJ

#### **1. Introduction**

The emerging RSS for Yorkshire and the Humber is being tested at several stages to ensure that it is sustainable and environmentally sound. Sustainability appraisal (SA) – a sustainability 'test' - of the RSS is required under the Planning and Compulsory Purchase Act 2004. Strategic environmental assessment (SEA) – an environmental 'test' - is required under the Environmental Assessment of Plans and Programmes Regulations 2004. Government guidance suggests that SA and SEA can be carried out jointly, and that is being done for this RSS.

SA/SEA involves:

- compiling information about the environmental, social, economic and policy context in which the RSS is being developed;
- appraising the RSS at various stages of its development, and suggesting possible ways of making the RSS more sustainable and environmentally sound;
- consulting on the different stages of the emerging RSS and the accompanying appraisal reports;
- taking the appraisal reports and consultation findings into account in decision making; and
- providing information when the RSS is adopted, showing how the results of the SA/SEA have been taken into account.

Table 1 summarises the links between the emerging RSS and the SA/SEA. The SA/SEA is being carried out by Riki Therivel (Levett-Therivel sustainability consultants) and Andy Spracklen (Halcrow) on behalf of a Steering Group of

regional stakeholders, and supported by staff from Yorkshire and Humber Assembly.

**Table 1. RSS stages and SA/SEA work carried out for each stage**

<b>Date</b>	<b>RSS stages that have involved SA/SEA</b>	<b>SA/SEA work carried out</b>
Spring/ summer 2004	Early development	Land Use Consultants collect data on the environmental, social, economic and policy context in which the RSS is being developed; consult on this <b>'scoping report'</b>
July 2004	RSS Draft Strategic Vision and Approach prepared and consulted on	Appraise RSS Draft Strategic Vision and Approach; consult on appraisal findings ( <b>'appraisal of the vision'</b> )
January 2005	Pre-draft RSS prepared and consulted on	Appraise pre-draft RSS; consult on appraisal findings ( <b>'appraisal of the pre-draft RSS'</b> )
Summer 2005 (expected)	Draft RSS prepared and consulted on	Appraise draft RSS; consult on appraisal findings

This brief report summarises the findings of the scoping report, appraisal of the vision, and appraisal of the pre-draft RSS. It also discusses future SA/SEA steps.

## 2. Scoping report

The scoping report puts forward SA/SEA objectives against which the emerging RSS can be tested. These are shown in Box 1.

### Box 1. SA/SEA objectives

1. Good quality employment opportunities available to all.
2. Conditions for business success, economic growth and investment.
3. Education & training opportunities which build the skills and capacity of the population.
4. Conditions and services to engender good health.
5. Safety and security for people and property.
6. Vibrant communities which participate in decision making.
7. Culture, heritage, leisure and recreation activities to all.
8. Local needs met locally.
9. A transport network which maximises access whilst minimizing detrimental impacts.
10. A quality built environment and efficient land use patterns, that make good use of derelict sites, minimise travel and promote balanced development.
11. Quality housing available to everyone.
12. Bio-diverse and attractive natural environment.
13. Minimal pollution levels if environmental impacts are a significant result of the activity consider an environmental impact assessment.
14. Minimise greenhouse gas emissions and a managed response to the effects of climate change. If environmental impacts are a significant result of the activity consider an environmental impact assessment.
15. Prudent and efficient use of energy and natural resources with minimal production of waste.

As part of the scoping process, much information about Yorkshire and Humber's environment, economy and social issues was collected. It is available on [www.yorkshirefutures.com](http://www.yorkshirefutures.com). Based on this, the scoping report identifies key sustainability issues for the region. These are shown in the first row of **Table 3**.

The scoping report also analysed the RSS's links to 31 other plans and programmes. It stressed the need for the RSS and the emerging regional housing and economic strategies to be consistent and mutually supportive. The Northern Way Growth Strategy also has implications for spatial planning in the region.

### **3. Appraisal of the vision**

The RSS Draft Strategic Vision and Approach of July 2004 proposed a sub-area approach, and outlined how future development might look in each of the six proposed sub-areas.

The main points made in the appraisal of the vision were that:

- The sub-area approach seemed a reasonable way forward.
- Whether York is in the Leeds city region or has its own sub-area is probably less important sustainability-wise than how the strategies for the area(s) are implemented.
- The emerging RSS should avoid vague terms and jargon such as 'sustainable transport' and 'building on assets'.
- The vision generally seemed strong on economy, with a focus on external links and good marketing; not reflective enough of environmental constraints (e.g. biodiversity, climate change); and dealt with social issues in an indirect manner, with some gaps (e.g. safety/security, health, culture/leisure).
- The visions for the Leeds city region and South Yorkshire area were so economically focused that they were unlikely to be sustainable.

These points were taken on board in the development of the pre-draft RSS.

### **4. Appraisal of the pre-draft RSS**

The pre-draft RSS of January 2005 takes the form of 25 topic papers:

- |  |                        |
|--|------------------------|
| 1. Introduction to Pre-Draft RSS         | 8. Water               |
| 2. Spatial Options                       | 9. Sustainable Tourism |
| 3. Housing                               | 10. Forestry           |
| 3A. Distributing the Housing Requirement | 11. Biodiversity       |
| 4. Economy                               | 12. Culture            |
| 5a. Freight                              | 13. Health             |
| 5b. Strategic Public Transport           | 14. Education          |
| 5c. Public Transport Accessibility       | 15. Minerals           |

- |                                     |                                  |
|-------------------------------------|----------------------------------|
| 5d. Demand Management               | 16. Sustainable Waste Management |
| 5e. Aviation                        | 17. Retail and Leisure           |
| 5f. Transport Investment Priorities | 18. Monitoring                   |
| 6. CAP reform                       | 19. Climate Change               |
| 7. Energy                           |                                  |

The central of these, on which the SA/SEA has focused, is **Topic Paper 2 on spatial options**. It proposes three scenarios for each of six sub-areas:

- *Scenario A – responding to market forces* emphasises market interest and particular regional strengths as the driving forces for future development and change – along the lines of a ‘growth poles’ approach.
- *Scenario B – matching need with opportunity* emphasises meeting needs – which could be social, economic or environmental.
- *Scenario C – managing the environment as a key resource* places more recognition on the significance of our environment to our future, including to our economic and social well-being.

The scenarios suggest different relative growth focuses between the sub-areas, and different ways in which development could take place in each sub-area.

#### **i. Appraisal of the spatial options**

The appraisal of the pre-draft RSS notes that, critically, many of the RSS’s impacts will depend on how the scenarios are implemented on the ground, for instance whether congestion charging is put in place or public interventions made to stimulate investment in areas of need. However, *overall Scenario A seems less sustainable than Scenarios B or C in every sub-area. Scenario B seems to have the most positive elements, although a combination of Scenarios B and C would probably be most sustainable.*

*Scenario A* is most likely to promote investment and expansion, and lead to more jobs and housing with the least need for public intervention. It is probably the most ‘implementable’ of the scenarios. However, by focusing on those areas and types of development that are already doing well, it would probably significantly increase social inequalities: for instance, its growth focus on the Leeds City Region and Vale & Tees sub-areas would probably help to increase the total number of jobs and houses, but these may well go to people who already have (good) jobs and houses.

By promoting ‘connectivity’ and development in corridors, Scenario A would encourage further reliance on the car, with associated impacts on air quality, climate change, and health. Between 1993 and 2002, road traffic in the region already increased by 19%. Scenario A would probably exacerbate this trend. Scenario A is likely to have negative impacts on biodiversity, risk of flooding and climate change. Mitigation measures such as congestion charging to reduce

traffic impacts and improving the skills of local residents to help them take up the new jobs could help to improve Scenario A.

*Scenario B* is oriented to providing housing and jobs for those who need it, and improving local services and access to them. It would help to meet local needs locally, improve access to services, improve health and reduce inequalities. Its growth focus on South Yorkshire, the Humber Estuary and the Coast would have beneficial impacts for health, access and equity by focusing development on those areas that need it the most. By improving locally-accessible services, Scenario B would help to reduce the need to travel, with benefits for health and the environment.

Scenario B also does well economically because it focuses on providing jobs for local people, providing a diversity of jobs, and supporting existing businesses. Employment and housing numbers would probably rise less quickly than under Scenario A because they would require more intervention and public subsidy, but they would fulfil local needs better. More emphasis on protecting sensitive landscapes and environments could further improve Scenario B.

*Scenario C* focuses on protecting environmental assets and minimising the need to travel. This is beneficial in terms of biodiversity, pollution levels, and climate change. The scenario's growth focus on the central urban areas – Leeds City Region and South Yorkshire – and its general 'environmental' theme would help to minimise the need to travel and live within environmental constraints. Reducing the need to travel should also bring social benefits, such as providing for local needs locally, and the long-term health benefits of a cleaner environment.

On the other hand, a strong protection of environmental assets could at times constrain economic development and the provision of housing, particularly in areas where this may already necessitate considerable public intervention and funding. Its impacts on employment and housing for those who need it, and on equity generally, would depend on how growth was carried out and where the growth would be within the sub-areas. A greater emphasis on meeting local needs could improve Scenario C.

The appraisal also highlights the need for a clear and coherent regional approach to dealing with peripheral areas like Whitby, Scarborough, and Settle. Traditional approaches to peripherality have been to generate a competitive economic environment and a wider skills base through, for instance, improved transport links between the core and periphery and within the peripheral area, and funding (e.g. EU Structural Funds). This is the approach taken in Scenario A, while Scenarios B and C focus more on local service provision and the complementary role of settlements in peripheral areas. The appraisal suggests that peripherality could be seen as a positive characteristic and function of some areas, a contribution to the region's diversity and sustainability, and something which should be viewed as an opportunity (e.g. through development that is independent of location) rather than a 'problem'.

## ii. Links to key sustainability issues

One way of 'pulling out' the key impacts (significant effects) of scenarios is to focus on the key sustainability issues for the region (see Box 1 above). These are summarised in Table 2 below:

**Table 2. Links between key impacts and regional sustainability issues**

Key sustainability issues	Key impacts (positive or negative)		
	Scenario A	Scenario B	Scenario C
Social inequalities	-- Focuses on connectivity, either to other sub-areas or to wider markets to lead economic growth, but investment is likely to favour those who are already well educated, economically active and mobile	++ Explicitly recognise the need to try and improve the deal for everyone, focusing on appropriate development, local jobs and training for those in dispersed settlements	? Similar to Scenario B, but depends on how and where development occurs
Lifestyles (mobility and dispersal)	- Focuses on connectivity, facilitating movement between different parts of the region, and outside the region	++ Focuses on making services easily accessible	++ Focuses on minimising the need to travel, even where this may have economic consequences
Regional economic prosperity (disparity thereof)	+/- Most likely to support economic investment and lead to more jobs, but not necessarily for local residents and investment may leak out of the region	+/- Would focus on providing for local needs, which would probably lead to less economic activity overall, but might benefit the region more	? Similar to Scenario B, but depends on how and where growth occurs
Climate change	- Improved mobility and less efficient land use would have negative effect	? Would depend on how and where development occurs within areas of need	++ Best in terms of emissions of greenhouse gases due to its emphasis on reducing the need to travel and on sustainable construction.
Biodiversity	- Most negative impacts, particularly major development in the Goole-Hull area would affect the Humber Flats Marshes and Coast Ramsar site	? Whilst aiming to reduce the need to travel, helping to reduce transport impacts on biodiversity (e.g. fragmentation, noise), will depend on how and where development occurs	++ The strongest in its protection of areas of biodiversity importance due to its emphasis on environmental protection and reducing the need to travel
Waste and resource consumption	? None of the scenarios in Topic Paper 2 explicitly addresses this issue, although 16 will. Need to cross-reference with Regional Waste Strategy.		
Rural and urban landscapes	- None of the scenarios deal with building design directly, but is likely to be negative	? None of the scenarios deal with building design directly, but will depend on how and where development occurs	++ None of the scenarios deal with building design directly, but is strongest in its protection of areas designated for their landscape value
Demographic trends	? Likely to be least positive as it relies more on private transport and less clearly focuses on service provision	+ Emphasis the provision of accessible services (and to lesser extent public transport)	+ Emphasis the provision of accessible services (and to lesser extent public transport)

### iii. Appraisal of the topics

The other topic papers (3-19) in the pre-draft RSS were also briefly appraised to identify any obvious gaps and unsustainable aspects. Generally, the appraisal found that:

- Only topic paper 3A (housing distribution) carries through the analysis of Scenarios A, B and C. Such a scenario analysis could be a useful basis for exploring the issues raised in several of the other topic papers, e.g. on economy, CAP reforms, tourism, culture, retail and leisure.
- Several of the topic papers seem to consider regional-level activities as being primarily large scale and infrastructure-dependent, e.g. transport, culture, leisure. Although the RSS's focus clearly needs to be regional, it could give more support to smaller, local, non infrastructure dependent activities, e.g. walking/cycling, allotments, children's play areas. **Andy, what does PPS11 say about local v. regional?**
- Some topic papers are very good at identifying links to other topics and mutually supportive policies, e.g. those on biodiversity and culture. Others could have benefited from using a similar cross-cutting approach, e.g. freight, CAP reforms.
- None of the topic papers seem to consider the opportunities provided by climate change (especially warmer summers) for e.g. sport, leisure, tourism, biodiversity.
- Several topic papers still use a lot of jargon, e.g. 'sustainable tourism', 'sustainable means of access'.
- Topic papers 4 (economy) and 5a (freight) are very demand-driven. Is this appropriate?

## 5. Main issues identified to date

Table 3 summarises the sustainability drivers and constraints are likely to be central to the sustainability and environmental soundness of the draft RSS:

Table 3. Key sustainability drivers and constraints for each sub-area

	<b>Sustainability opportunities</b>	<b>Sustainability constraints</b>
<b>Entire region</b>	See below	<p><i>(those in bold italics are particularly significant)</i></p> <ul style="list-style-type: none"> <li>• <b><i>Social inequalities</i></b>: health inequalities, growing disparities, income levels, social exclusion</li> <li>• <b><i>Lifestyles</i></b>: increasing mobility for people who own cars, increasing dispersal between places where people live, work and shop, and increasing patterns of consumption</li> <li>• <b><i>Regional economic prosperity</i></b>: slower economic growth and lower levels of prosperity compared to regions in other parts of the country</li> <li>• <b><i>Climate change</i></b>: reducing emissions of greenhouse gases and adapting to impacts of change</li> <li>• <b><i>Biodiversity</i></b>: significant decline in the 20<sup>th</sup> century and further threats from climate change</li> <li>• <b><i>Waste and resource consumption</i></b>: increasing levels of consumption and waste production</li> <li>• <b><i>Rural and urban landscapes</i></b>: protecting and enhancing the unique sense of place and character of the region's settlements and rural areas</li> <li>• <b><i>Demographic trends</i></b>: the changes and demands arising as the region's population gets older</li> </ul>
	<ul style="list-style-type: none"> <li>• Attractive environment &amp; settings</li> <li>• Potential for offshore energy, tourism, outdoor recreation, agriculture, biofuels</li> <li>• No particular flood risk at main towns</li> </ul>	<ul style="list-style-type: none"> <li>• Structural decline of traditional industries</li> <li>• <b><i>Lowest GDP of all the region's sub-areas</i></b></li> <li>• Health in the northern part of the sub-area is poorer than in other parts of the region</li> <li>• <b><i>Peripheral area with limited road and particularly rail access within the sub-area and the rest of the region/country; increase in journeys to the main urban areas would typically be lengthy, with consequent environmental and social impacts:</i></b> <ul style="list-style-type: none"> <li>• Whitby is in a National Park, hard to get to (especially by train), with excellent water quality.</li> <li>• Scarborough is 40 miles from York by road, and one train service per hour.</li> <li>• Bridlington is 30 miles from Hull along A165. Driffield is 22 miles, but along a more convoluted network of smaller roads. Half-hourly train services.</li> </ul> </li> <li>• Significant coastal erosion, e.g. since 1950s 0-0.7m/year at Bridlington, 0.3-1.8m/year at Skipsea, 0.05-3.0m/year at Hornsea. Managed retreat practiced in some areas.</li> <li>• Flood risk along the Humber.</li> <li>• The coast at Flamborough Headland and along the North York Moors National Park has Heritage Coast designations</li> <li>• Bathing water quality along the sub-area has been improving steadily over the last 5 years, but emerging tighter regulations are likely to be a problem (see Additional Notes).</li> <li>• Nitrate vulnerable area in the south of the sub-area.</li> <li>• <b><i>National Park, SPA, SCA, SSSIs in north of sub-area; Ramsar site in south of sub-area.</i></b> There is an SCA off Bridlington, and coastal water quality is quite high and improving.</li> </ul>
<b>The Coast</b>		

### Sustainability opportunities

- The Humber has high levels of manufacturing, transport and communications firms, and public administration employment.
- Humber ports carry 14% of UK overseas trade and contribute £250m annually to the regional economy, supporting 47,000 jobs (12% of Humber sub-region employment).
- Other established business clusters are in food production (incl. agriculture), chemicals, construction, engineered products and metals.
- 100% of the region's estuarine waters are "good" or "fair" quality
- Immingham has a good record of moving things inland by train.
- The sub-area has a high quality environment
- The health of the sub-area's population is generally good
- Local heritage significance at Richmond and Ripon
- Flooding is not a particular problem
- Water availability/provision is less of a constraint than in the rest of the region

### Sustainability constraints

*(those in bold italics are particularly significant)*

- Lower than average economic activity rates, higher than average unemployment, low educational attainment and other qualifications, and low business start-up rates. The sub-area has proportionately fewer people in 'higher-order' knowledge occupations and industries than nationally.
- The Humber area has some of lowest life expectancy in the region. Hull and Grimsby/ Cleethorpes score poorly on IMD health domain score.
- ***Hull is the sixth most deprived district in the country in the Index of Multiple Deprivation.***
- Hull and Grimsby have a high percentage of people who face fuel poverty.
- The Humber region has relatively high levels of crime – in particular violent crime, theft and burglary
- ***The Humber Estuary is a major estuary draining one fifth of the land area of England and Wales. It is of national and international conservation value and contains a range of important habitats including mudflats, saltmarsh, reedbeds and coastal lagoons and supports more than 20,000 wintering waterfowl.***
- ***The Goole-Hull 'corridor' has significant environmental constraints (flooding, Ramsar site)***
- The area is sensitive to eutrophication.
- Sea level rise would have a particularly marked effect on the Humber Estuary.
- ***No additional ground or surface water is available in the Hull area, and the water resource is potentially overcommitted on south bank of the Humber.***
- Cleethorpes is virtually surrounded by areas that are vulnerable to flooding, and coast is SPA, Ramsar, SSSI
- Localised floodplain constraints
- Most of this area does not yet have broadband coverage
- ***Almost 6% of rural dwellers in North Yorkshire (which includes this sub-area) live more than 8km from a doctor's surgery***
- Geological constraints at Ripon
- The sub-area adjoins National parks, SPA/SAC/SSSIs
- Air quality problems along the A1 corridor
- Much of the sub-area is a nitrate vulnerable area
- ***Much of the sub-area is quite remote, with lengthy (primarily car) journeys needed to reach large urban centres.***
- Northallerton is 25 miles from the Tees city region with (at present) only hourly train services.

Remoter Rural	<p><b>Sustainability opportunities</b></p> <ul style="list-style-type: none"> <li>• The sub-area has a high quality environment, with potential for tourism, agricultural diversification and possibly biofuels</li> <li>• The health of the sub-area's population is generally good</li> </ul>	<p><b>Sustainability constraints</b> <i>(those in bold italics are particularly significant)</i></p> <ul style="list-style-type: none"> <li>• <b><i>No additional groundwater resources are available, and additional surface water resources available only in west</i></b></li> <li>• Most of this area does not yet have broadband coverage</li> <li>• <b><i>The region is (by definition) remote, with difficult access. Journeys to the main urban centres are likely to be long, with corresponding environmental and social impacts.</i></b> The topography of the area has an impact on communication links.</li> <li>• The A65 and Skipton/Settle/Bentham 'rail corridor' has only one train every 3-4 hours at peak time</li> <li>• Almost 6% of rural dwellers in North Yorkshire (which does not correspond exactly with this sub-area) live more than 8km from a doctor's surgery.</li> <li>• <b><i>National Parks and Areas of Outstanding Natural Beauty cover much of the area</i></b></li> <li>• No additional groundwater resources are available, and additional surface water resources are available only in the west of the sub-area</li> </ul>
	Leeds City Region	<ul style="list-style-type: none"> <li>• GVA per head is considerably higher than the regional average.</li> <li>• The sub-area is inherently multi-centric, with distinct cities and towns: Bradford, Dewsbury, Halifax, Harrogate, Huddersfield, Wakefield and York</li> <li>• Considerable heritage assets, particularly York and the historic market towns</li> <li>• Extensive areas with high housing demand</li> <li>• Higher land and rental values than elsewhere in the region</li> <li>• High level of R&amp;D links between firms and universities</li> <li>• Relatively high number of business start-ups</li> </ul>

### Sustainability opportunities

- Low value homes and increasing developer interest in completing new homes has had historic and recent consequences for house prices. Over 2002/03, average property prices in South Yorkshire rose faster in South Yorkshire (especially in Sheffield) than regionally

### Sustainability constraints

*(those in bold italics are particularly significant)*

- ***Employment in low-skill jobs is high, and in high-skilled jobs low***, compared to the regional and national average; this particularly the case in Rotherham and Barnsley.
- ***The proportion of economically active adults is relatively low.***
- ***Nearly 36% of adults in South Yorkshire have no qualifications***; 7% higher than the national average.
- ***41% of all households in South Yorkshire contain one or more persons with a limiting long-term illness***, 7% higher than the national average. 22.2% of the total population feel they have a long-term illness or disability that limits their daily activities or work.
- The sub-region has high levels of burglary and vehicle crime.
- ***Considerable areas of multiple deprivation (housing, health, education) in Barnsley, Sheffield, Doncaster.***
- ***Poor air quality, particularly around the M1/M18 corridors.*** DfT announced in July 2003 that it plans to add capacity to M1 J30-42 widening, and M18 M1 to J3
- This is the only sub-area where people killed or seriously injured increased between 1994-8 and 2002-3 (though children killed or seriously injured decreased by more than 25%)
- Flood risk, particularly along Rivers Dearne and Don. The area to east of Doncaster is all floodplain. ***Almost the entire Doncaster/Robin Hood/Scunthorpe corridor is at threat from flooding.***
- Nitrate Vulnerable Area through much of the sub-area
- ***Over-committed groundwater resources and limited additional surface water resources mean that water resources are likely to pose a real constrain in this sub-area.***
- The area to the west of Sheffield is SPA/SSSI. Hatfield Moors to S of M180 and Thorne Moors to N of M180 are SCA/SPA/SSSI.

The implications for developing the draft RSS can be summarised in terms of different components of the strategy.

In terms of **spatial strategy**:

- Of the spatial options, both region-wide and for all of the sub-areas, Scenario B is likely to be the most sustainable and balanced spatial development strategy, possibly in part combination with Scenario C. Scenario A is likely to have significant adverse effects, particularly in relation to environmental constraints and inclusion and equity.
- Decisions regarding the choice between the options (or combination of) and how these are applied *consistently* across all aspects of policy and strategy are critical in the next stages of developing RSS. In this respect

there may prove to be conflicts between local, sub-area and regional needs and aspirations. A strategic perspective will need to be maintained. Achieving a sustainable pattern of development and quality of life across the region *as a whole* (as in Scenario B/C), may require significant growth at a local or sub-area level in peripheral areas and/or areas in need of regeneration which may have some adverse effects at a local level. Scenario A may lead to the reverse effect.

- Careful attention needs to be given to how the preferred spatial development strategy and the topic areas are developed *in unison* to inform strategy, policies and allocations. For example, as Section 4 above outlines, some Topic Papers have taken a demand-led approach (broadly in line with Scenario A) whilst others – particularly those relating to environmental topics – have tended to take a more precautionary approach (broadly in line with Scenario C). An RSS based on Scenario B will need to balance these potentially competing issues.
- The spatial balance of housing and employment, both existing and proposed across the region and sub-areas, will need to be carefully considered. A clear understanding of what level and standard of services (e.g. health care facilities, publicly accessible open space, shops) exist, and are proposed, across the region, will be required to support such a balance and a robust hierarchy of centres.
- A coherent approach to peripheral areas like Whitby, Scarborough and Settle is needed. Traditional ('Scenario A') approaches to dealing with peripherality have included the provision of transport links between the core and periphery and within the peripheral area; funding through e.g. EU Structural Funds; and attempts to boost the local economy. However new infrastructure can speed up rather than slow down the decline of peripheral areas. Arguably peripherality is a fundamental characteristic and function of some areas, which contributes to the region's diversity. Scenarios B and C focus on local service provision and the complementary role of settlements in peripheral areas, but this would need careful fleshing out in the RSS. The RSS could promote development that is independent of location – for instance in education, IT or agriculture – and/or that actively relies on peripherality, such as outdoor tourism.

In terms of **transport strategy**:

- Of the three scenarios, Scenario A is likely to be the least sustainable in terms of transport given its greater emphasis on connectivity and mobility, which is likely to increase polarity between the most and least mobile members of the population. Scenario B aims to help meet local needs through improving access to local services, while Scenario C aims to reduce the need to travel by helping to meet local needs locally: both potentially improve access to services to many people and reduce social exclusion. Decisions regarding the preferred scenario – particularly if a combination is settled upon – will need to give coherent consideration as

to an appropriate and sustainable balance between increasing connectivity, improving accessibility, and providing local services.

- The transport strategy should consider not only what additional transport infrastructure will be needed to address pressures resulting from new development, but also the location and provision of social/community infrastructure associated with new development.
- In making investment decisions, a strong link will be required between the RSS and Regional Transport Strategy. The increasing role of regions (e.g. through the Yorkshire & Humber Transport Forum and Government proposals for regional funding allocations) in making decisions on strategic transport investment priorities opens up a new opportunities to coordinate strategy with capital investment at the regional level. Such investment decisions, linked to strategy, should have clear aims and objectives.
- A particularly clear rationale will be required between, on the one hand, development sites where the benefits of regeneration outweigh them being in less than sustainable locations, and on the other hand, an urban-centred location policy which overly stresses urban areas.
- Air travel to and from the region is expected to roughly treble between 2004 and 2030. Increased air travel is problematic both environmentally and socially, although it is often perceived as benefiting regional economy. Scenario A would most actively promote air travel and development of the airports, whilst Scenarios B and C take a more neutral stance. Recognising that some airport policy parameters have been set nationally, the RSS should give a clear policy stance regarding the conditions under which facilities for air travel will be supported, giving particular regard to surface access strategies that maximise accessibility by public transport and other more sustainable forms of transport. It should also ensure that the relationship between airports and the location of housing and employment development is conducive to responsible management of environmental resources.

In terms of **environmental strategy**:

- Generally Scenario C is most supportive of environmental protection and enhancement, and Scenario A least so. In particular, major development in the Goole-Hull area, as proposed under Scenario A, would affect the Humber Flats Marshes and Coast Ramsar site.
- The region is not on target to achieve either the regional or the government's national carbon emissions targets. The RSS needs to emphasise energy efficiency within the business and domestic sectors, increasing the region's renewable energy generating capacity, sustainable construction and more sustainable transport options

- Flooding will be an increasing problem over the RSS's lifespan. Development should be planned to avoid such areas, and the Environment Agency should be consulted on their plans for e.g. managed retreat.
- Water provision will be a problem in some areas of the region. In such areas, the RSS should consider linking permission for new development with requirements to improve water use in existing development, so that the total water use in such areas does not increase.

In terms of **housing strategy**:

- Scenario A, focusing as it does on current market interest, is most likely to lead to the construction of new housing, but not necessarily meet local needs. Scenario B would address this, but given its focus on areas of deprivation would require more intervention and public funding. A balanced housing strategy therefore will not just require a sustainable location policy. It will also require a spatial strategy based around a clear understanding of regional and sub-regional housing needs, backed up by clear policies and programmes to assemble land and monitor outcomes. Such outcomes should focus around factors of quality of life that enable communities to be sustainable, e.g. Egan Review indicators, meaning that a holistic approach to housing strategy will be required.
- Phasing of housing land releases will need to be considered, particularly making releases of some land dependent on the previous provision of certain infrastructure, types of housing, or housing in less favoured locations.
- Fundamental to a holistic approach will be the balance between jobs and housing at a regional and sub-regional level. Work ongoing by the Assembly to understand the relationship between jobs and housing should inform this approach, although caution should be given to relying on trend information without also considering aspirations and future market conditions. Such a balance will in part depend therefore on the economic capacity of sub-areas.

In terms of **economic strategy**:

- In view of the principle of achieving jobs/housing balance, a thorough understanding of the propensity of housing to support economic development and vice versa will be required. As with housing, careful consideration will need to be given between, on the one hand, working with market conditions and, on the other, stimulating or creating new market conditions in areas of regeneration need. Linking need with opportunity must in part mean ensuring accessibility to jobs for those in deprived areas of the region, whilst ensuring that other public interventions support people in being able to access jobs in terms of skills. As previously indicated, this may mean that in some locations the regeneration benefits of bringing key employment sites forward may

outweigh their less than sustainable location which, without investment in new public transport provision, would otherwise be the case.

- The RSS should therefore give a clear policy direction as to how competing objectives should be treated in order to achieve more 'rounded' sustainability. This will require strong linkages to the Regional Transport Strategy to ensure that investment in more sustainable forms of transport go hand in hand with economic regeneration. The focus should therefore be more on accessibility planning than planning for mobility.

## **6. Issues that the RSS has not addressed to date**

As indicated above, the priority issue that needs to be more fully addressed is the joining up of preferred spatial development strategy, the needs, roles and hierarchy of settlements/sub-areas and the corresponding distribution of housing and employment development. Critically, the RSS and RES must be mutually supportive and consistent in these respects and we therefore recommend that a common SA/SEA approach is taken to their review and development.

In addition there are a number of issues that are potentially in the RSS (and in some cases RES) remit – if a regionally-specific perspective can be justified – which have only been partly covered in the topic papers to date. These are:

- safety and security
- building design and quality, local distinctiveness, avoidance of sensitive areas, building re-use, use of building materials etc.
- the landscape, including tranquillity
- avoidance of pollution, prudent use of natural resources
- promotion of creativity and innovation (as opposed to competitiveness and skills).

Further work will therefore be required on these topic areas if regionally appropriate. For example, landscape character could conceivably have a strategic dimension that warrants a regional approach: the conservation of Yorkshire and Humber's landscape assets, as a unique selling point, can contribute also to regional economic goals.

## **7. Information and data gaps**

Generally the baseline data provided as part of the scoping report is good. However further information could be provided on the location and extent of coastal erosion, and on the quality and sensitivity of landscapes. The following additional information would also be useful:

- Current levels of service provision, and whether it is appropriate to have standards for service provision (e.g. according to size of settlement)

- Current and likely future links/balance between housing and employment
- An indication (on a map) of the accessibility/peripherality of different parts of the region.

Topic Paper 2 has little or no information on:

- safety and security (the region has the highest burglary rate in the country and the second highest auto crime rate);
- landscape
- resource efficiency, good design, local distinctiveness, sustainable urban drainage systems, etc.
- pollution minimisation and control

These would not be expected to be covered in a pre-draft RSS, but will become more pertinent – and will be appraised - at the next, more detailed RSS development stages.

## 8. Next steps

The appraisal of the pre-draft RSS, and the consultation comments on both the pre-draft RSS and its appraisal, will inform the development of the draft RSS. In turn, the draft RSS will be appraised, using the SA/SEA objectives shown in Box 1<sup>1</sup>. The resulting report will fulfil the requirements of the Planning and Compulsory Purchase Act (which requires 'sustainability appraisal') and the Environmental Assessment of Plans and Programmes Regulations 2004 (which requires the production of an 'environmental report'), and will clarify which aspects of the report fulfil which legal requirements.

**Table 3. RSS and SA Timetables - April 2005 onwards**

Timing	RSS	SEA/SA
April 2005	<ul style="list-style-type: none"> <li>• Process of Drafting RSS strategy and policies begins</li> <li>• Early May Commission meeting to agree direction on key strategy/policy areas</li> </ul>	<ul style="list-style-type: none"> <li>• SA summary report provides key messages to pro-actively shape the RSS strategy and policy drafting</li> </ul>
April to the end of June 2005	<ul style="list-style-type: none"> <li>• Preparation of a 'heads of terms' RSS document – a bullet point style RSS document setting out clearly the direction and main justification of RSS strategy and policy but without fully worded policies and supporting text</li> <li>• 'Heads of terms' RSS</li> </ul>	<ul style="list-style-type: none"> <li>• Appraisal of the 'heads of terms' RSS document (during second half of June)</li> <li>• Appraisal findings considered at Officer meeting and Commission meetings on 28 June and 14 July respectively</li> </ul>

<sup>1</sup> The plan is for the draft RSS to be appraised twice: once while it is still in rough form so that the early appraisal findings can still influence the emerging draft RSS; and once for final version of the draft RSS. This two stage process was also carried out for the pre-draft RSS and was found to be very useful.

<b>Timing</b>	<b>RSS</b>	<b>SEA/SA</b>
	document reported to officer meeting on 28 June and Commission meeting on 14 July	
<b>Mid July 2005 to end of August 2005</b>	<ul style="list-style-type: none"> <li>• Submission draft RSS document worked up in full</li> </ul>	<ul style="list-style-type: none"> <li>• Appraisal findings on the 'heads of terms' document taken into account in drafting the final submission draft RSS</li> <li>• Appraisal report prepared</li> <li>•</li> </ul>
<b>September 2005</b>	<ul style="list-style-type: none"> <li>• RSS document reported/agreed through September round of officer and member meetings</li> <li>• RSS document submitted to Government towards the end of the month</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability Appraisal report submitted to Government alongside the draft RSS document and a Pre-Submission Consultation Statement</li> </ul>
<b>October 2005 to January 2006</b>	<ul style="list-style-type: none"> <li>• Formal 12 week consultation period on draft RSS document</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability Appraisal Report available as part of RSS consultation</li> </ul>