

Appendix L. 'Heads of Terms' assessment

Report to Yorkshire and Humber Assembly

Sustainability Appraisal and Strategic Environmental Assessment of the Regional Spatial Strategy for Yorkshire and the Humber: brief sustainability analysis of "Heads of Terms" reports

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SUMMARY

Spatial development principles/overall

- Overall the principles are fine in giving a balanced set aims for the RSS, though some of the phraseology is still a little 'fluffy' in places and the current sequence of 'connectivity' priorities still seems to reflect a Scenario A approach: flip them around?
- Little direct effort to tackle lifestyles, waste production, resource consumption (this could change once the environment section is fleshed out)
- Demographics – the ageing of the population – is hardly mentioned.
- South Yorkshire only directly really considers one of these 7 issues
- Consider alternative approaches to:
 - dealing with peripheral town, particularly on the coast
 - dealing with declining S. Yorks. villages
 - growth of Robin Hood and Humberside airports
- Much work still to be done to ensure that connectivity is dealt with a holistic and sustainable way – accessibility within areas is just as important (if not more so) than connectivity which can imply longer distance journeys, unless intrinsic to the settlement hierarchy approach to improve amenities at key hubs serving a rural or urban hinterland
- Much work still to be done in relation to the balance between housing and jobs (see separate set of thoughts).

Sub-areas

- Nicely oriented towards different contexts and issues of sub-areas, and much more spatially specific than vision. Generally good characterisation of areas.
- Considerable repetition from vision (e.g. coastal sub-area uses a lot of the same words as original vision) – does not deal with some issues identified in the SA/SEA of the vision
- Some fluffy words, e.g. “develop unique assets of south bank site” (Humber); “build on sub-area assets” (V+T); “convenient socially and economically-linked locations” (S Yorks)
- **Humber**: more needed on conservation value of Humber and water quality; connectivity is most unsustainable aspect (e.g. increasing capacity of E20 and A15)
- **Coastal**: nice focus on revitalisation and preservation of environmental assets; problems re. dealing with peripheral areas/ ‘connectivity’ where towns are far apart; more roads and conference facilities in peripheral areas not environmentally sustainable
- **Vale and Tees**: fluffy wording which could be tightened up for more sustainable implementation; ‘connectivity’ is most risky aspect – greater emphasis on local amenities, accessibility and connectivity required
- **Remoter rural**: needs better links to policies of surrounding areas; policies on economy and infrastructure could be more explicitly framed
- **South Yorkshire**: Takes tough and innovative decisions (spatial development hierarchy, some villages will not get employment-related spatial investments, focus on connectivity through public transport); different approach from the other sub-area; still looks very economically focused and could stress social and environmental benefits more; role of small villages not clear; Robin Hood Airport likely to be good economically but poor environmentally
- **York**: “significant new housing and infrastructure provisions” will have significant sustainability effects on the York and adjacent sub areas – robust, holistic studies will be required to ensure that these effects are fully assessed, impacts mitigated against and the wider benefits quantified and managed effectively to achieve sustainable development
- **Leeds**: good attention to linking housing with jobs, but overall too much emphasis on transport corridors, strategic land releases and flexibility of the labour market without corresponding explicit reference to sustainable mobility and particularly accessibility *within* the city region so as to reduce social inequalities/economic disparities.

Economy

- Difficult to appraise at this stage as no policy approach set out
- However, the general principle of arriving at guiding principles for employment land requirements across the different parts of the region, rather than setting arbitrary hectares is welcome
- Concern that as yet population and economic activity rates have not been taken into account in the economic model and has not yet been related to the housing model – this will be critical in order to meet the fundamental objective of balancing the two and in so doing achieve more sustainable patterns of development and movement

Housing

- Again, difficult to appraise due to lack of 'concrete' policies
- Very good reference to the cross-cutting issues relating to each component of housing provision, covering an audit as to how housing policy can address sustainability issues – this must be followed through to the formulation of draft policies
- Managed release of housing land, and mix of housing types, just as important as affordable housing in sustainability terms
- Reference to gypsies and travellers should be framed in a positive light given the social sustainability benefits of a strategic approach to this issue

Transport

- Puts forward all the right sustainability messages
- Seems rather bland and generic: some policies could apply to any region and some are covered by other policies (RSS, national government) – how do the policies facilitate a sustainable pattern of housing and employment development across the region, bearing in mind the particular constraints and issues of the region? Not clear!
- Has few clear links to the sub-area strategies, particularly to main new transport infrastructure proposed in those strategies
- Could emphasise getting people onto an appropriate mode (i.e. particularly rail rather than plane) for appropriate journeys, rather than on "achieving better access... to the full range of ... airport facility and services"

Environment

- This is a key section, which deals with 6 of the region's 7 key sustainability issues
- It is not fleshed out, so many of these comments may be unnecessary once it is.
- It does not visibly reflect the quite detailed (and often very good) proposals put forward in the related topic papers, nor consultation responses to them.
- Coastal zone management etc: check that policies R1, N5 and S6 adequately deal with the need to prevent development in areas of environmental drought and over-abstraction; rain-water harvesting in urban areas; flood risk protection of existing urban areas etc. as listed in topic paper 8?
- Stress habitat enhancement and creation more?
- Under forestry and waste, it is not clear why some policies are to be deleted, particularly as they seem to be quite good sustainability-wise.
- The section on minerals is very vague and difficult to appraise
- The section on waste does not (yet) deal with the provision of regionally important waste management facilities.

10 POINT VISION FOR RSS

- Although implied by points 4 and 7 respectively, not one point focuses on the environment (particularly sustainable resource use), nor on sustainable forms of transport
- Some of the points seem to overlap and repeat slightly, but otherwise seem to portray a balanced set of high level objectives that are commensurate with other regional strategies (check how relates to RSDF?)

SPATIAL DEVELOPMENT PRINCIPLES

Strategic Patterns of Development (Principle A): seems to give a balanced approach to the scale of development and investment that is largely in tune with the roles and functions of places – the point about minimising energy use is an important one and could be extended to all natural resources, given the cities and urban areas generally are major consumers – could something be said about monitoring the eco-footprint of urban areas in the Region? It is also not clear whether Principle A (and B) relates to a new or enhanced hierarchy of settlements, e.g. it is arguable that for sustainability and regeneration of the Coastal sub area, a stronger hub such as Scarborough is required, which would potentially imply greater growth than that which would be otherwise construed by its current trend and status?

Roles and Functions of Places (Principle B): in line with A above, also seems to give a reasonable and balanced approach, although it is not clear what is implied by the Region's main areas being "significantly strengthened as the location for major services and facilities" – if, as it would appear, means significant new development then planning to minimise or prevent unsustainable activities in respect of climate change, social inequalities and lifestyles will be particularly fundamental to successful implementation, in the light of the point above about cities being resource-hungry (it is, however, good to see the point about complementarity of settlements to prevent unnecessary competition – a greater steer on this would be helpful as the RSS policies are developed)

Location of Development (Principle C): gives a particularly strong steer on the sustainable location of development, although some of the phraseology is open to interpretation, e.g. what is an "appropriate" level of accessibility by public transport, walking and cycling? What is "significant" risk?

Environmental quality: Good emphasis on key environmental aspects; no obvious ones missing except that there is a strong policy ("improve") for non-protected areas but none for protected areas. 'Harnessing' of character/heritage is unclear and sounds like it might conflict with safeguarding.

Connectivity: The sequence of priorities reflects a Scenario A more than a Scenario B/C approach – outward oriented economy rather than support of local workforce, promotion of long distance travel rather than support of local centres.

Flip the sequence on its head? (or, even better, a sequence of bullet points 3, 4, 2, 1?)

Regionally significant investment priorities: Points 1, 3, 4, 5 look very good. What does “realising the opportunities” of environmental assets and transport infrastructure mean? Sounds like it could conflict with some environmental quality objectives.

HUMBER

- Nicely identifies the sub-area's character and key issues, and focuses effectively on reducing deprivation through urban regeneration
- Unclear wording:
 - "Develop unique asset of south bank sites"
 - "Mitigate summer water scarcity in the western parts of the sub area" and "Conserve the over abstracted aquifer in the western part of the sub area" (how? e.g. through demand management or construction of new reservoirs?)
 - "Capture local economic benefits of airports": how?
- Add brief information on the **environmental/conservation** value of the Humber Estuary, and be clearer about maintaining/enhancing that value
- Say something about landscape?
- Water quality in the Humber Estuary is currently good, and it sustains an important and sensitive Ramsar site. "Maximising the potential of the Humber Ports" should thus be done only if water quality in the estuary can be maintain/improved. Clarify this?
- Given the poor **health** status of the sub-region, does more need to be said about promoting healthy lifestyles and good health facilities? ageing population?
- The **connectivity** aspects are still the least sustainable. "Safeguarding and *increasing the capacity*" of the E20 and A15 and improving the secondary corridor links will be environmentally harmful, and the need for such expansion is not clearly shown in the paper. In particular, Immingham already has a good record of shipping goods by rail, and this could be promoted further.
- Similarly, 'capturing the economic benefits of airports' and 'supporting airport related development' should help to support the economy, but in a very 'Scenario A' manner that does not take account of related social and environmental costs.
- Essentially little has changed from the original vision, and the appraisal findings from the vision would still remain valid:

Appraisal objective	Comments
9. A transport network which maximises access whilst minimizing detrimental impacts	[the 'connectivity' proposals] are all about increasing the transport network detrimental impacts...would certainly occur
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	... [the 'connectivity' proposals] all have the potential to significantly increase greenhouse gas emissions

COASTAL

- Very nice identification of character and key issues, which covers the majority of the opportunities/constraints identified in the SEA/SA.
- Elegant focus on revitalisation whilst maintaining the area's environmental assets. "Innovative ways of improving public transport" is particularly nice.
- Unclear wording:
 - "Manage off shore developments and activities" (how? with what objectives?)
 - Suggest rephrase "Protect, enhance and manage the unique coastal heritage, and natural and international designations (*environmental and landscape*)"
- Given the ageing population, does the RSS need to say more about provision of appropriate health etc. facilities?
- The **connectivity** section is still the troublesome one from a sustainability point of view, particularly given all of the contextual commentary about the area's environmental beauty and sensitivity. Although references to strengthening ties with the rest of Europe have been removed from the proposals in the original vision, the strengthening of east-west links remains, and north-south links are to be 'safeguarded' (not clear what this means). Strengthening Whitby-Teeside links would essentially mean driving more cars for 30 miles through the National Park. Scarborough is 40 miles from York by road, and one train service per hour. Bridlington is 30 miles from Hull.
- Conference facilities at Scarborough and Bridlington would still lead to long-distance travel, particularly given the poor rail connections in the area. The appraisal findings from the vision would still remain valid:

Appraisal objective	Comments
9. A transport network which maximises access whilst minimising detrimental impacts	emphasise new infrastructure ...without a corresponding focus on minimising detrimental impacts
13. Minimal pollution levels if environmental impacts are a significant result of the activity consider an environmental impact assessment	Not mentioned directly. Several of the proposals are likely to significantly increase long-distance transport to and from the region, with associated impacts on air, noise, greenhouse gases.
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	

VALE AND TEES LINKS

- Good characterisation of the area with particular reference to housing affordability and unsustainable commuting patterns in this the most affluent, mobile population of the region
- Sub-area also has close links with northern parts of Coastal Sub-Area – say something about this in relation to regeneration and wealth creation?
- More could be said of the “potential to meet renewable energy targets”
- Under **economy**, “build on sub-area assets” – how? Relating skills of the population to unsustainable mobility patterns, must surely mean investing in new local employment opportunities to reduce commuting
 - “Capitalise on multimodal north-south links” – what does this mean and how does this relate to the sustainability issue of mobility in the sub-area?
 - The other aspects of economy help to counteract the above two concerns
- In terms of **environment**, “sustainable balance of development” must translate into the relationship between housing targets and employment land targets in the sub-area and consequently districts
 - No specific policy reference to renewable energy potential (as per comment above)
 - “Realise opportunities” – what opportunities? Development opportunities or safeguarding the natural environment opportunities?
- Under **governance**, what is meant by “establish opportunities” – links between LDFs and Community Strategies are important, but opportunities for what?
- The above issues do not fully translate into the **draft policy** itself – in particular, reference to housing restrictions is related to regeneration of the city-regions and employment development related to diversification – additionally the connection needs to be made with the need to reduce travel/commuting
- **In summary, connectivity** issue still the main one! – e.g. why have the main road links as the thickest lines on the accompanying map, rather than rail? No reference to east-west links on the map, which would be important to strengthen sub-area sustainability.

REMOTER RURAL

- Very good characterisation, including reference to “very significant degree represent a major part of the Region’s identity”, public transport and affordable housing
- Small point: references to “sub areas” should be “sub area’s”
- Strong emphasis on environmental protection, more in line with spatial strategy option C – one wonders how this would then relate to the stronger economic-led approaches of the city-regions?
- In view of this, the **economy** policies could be more explicitly framed, e.g. should not “appropriate” rural diversification be clarified to mean in both environmental and social/economic terms?
- In terms of **infrastructure**, references to public transport provision could be even more strong and explicit given the inaccessibility of many parts of the sub area, e.g. in relation to sustainable access by tourists
 - “ITC” presumably means “ICT” – Information & Communications Technology
- **Upskilling** needs to relate to employment diversification in the sub area and public transport accessibility, otherwise may result in unsustainable commuting patterns
- These points need to be picked up in the **draft policy** itself and, as with VTL, the connection is not clearly made between local housing and employment opportunities and public transport accessibility
- **In summary**, a very promising policy, but needs better linkages with those of surrounding sub areas.

SOUTH YORKSHIRE

- Takes some tough and innovative decisions, notably 1. spatial development hierarchy, 2. some smaller villages will not get employment-related spatial investment, 3. consistent focus on improving connectivity through public transport.
- Quite different in approach from the other sub-areas: need for more consistency of presentation?
- Still looks like a very economically focused approach, although it has a lot of implicit social and economic benefits. Make these more explicit?
- Does not mention some of the key sustainability opportunities and constraints of the sub-area: poor health, considerable areas of multiple deprivation, poor air quality around M1/M18, flood risk, over-committed groundwater resources.
- Under **economy**, proposes a “diverse and sustainable high growth economy for South Yorkshire”; “South Yorkshire’s logistical potential is great”; “Promote SY as a centre for high technology manufacturing and knowledge based services”. This is a coherent approach which should be compatible with the skills of the sub-area’s residents. A “*sustainable* high growth economy” is probably only really achievable by a coordinated and coherent effort to move freight from road to rail. Focus on ‘green’ technology/manufacturing?
- Definition of **settlement hierarchy** nicely outlines the level of services that would be expected in the different types of settlements. Say something about trying to provide any additional/complementary services needed for a given settlement to meet its role in the hierarchy (e.g. if large village has pub but no local shops, should the aim be to provide local shops?)
- Gives somewhat conflicting messages about the **role of towns/villages**:
 - “Some are or can become increasingly attractive for housing development... but others face social and economic decline”
 - “There is no prima facie reason for planning assumptions that land in and around these places will continue to be suitable for industrial or commercial development”
 - “Enhance transport connectivity to improve competitiveness and enable the unlocking of key outlying settlements that would otherwise decline into uncompetitiveness and unsustainability”
 - “Adapt isolated and declining coal field settlements... where this would meet the demands for *convenient socially and economically-linked locations*” (this set of words – not sure what they mean - is used twice)Clarify what these points would mean in practice. When would new housing be promoted? new employment? improved public transport? improved roads?
- Under **environmental quality**, add information about environmental constraints (flooding etc.) and how these might be dealt with; aim to enhance biodiversity?
- The sections on **connectivity** consistently promote public transport, which is more sustainable on both social/equity and environmental grounds. But at the same time it promotes the most environmentally damaging mode of all by aiming to develop the Robin Hood Airport. Consider a range of responses to the airport?
- No mention of types of housing

LEEDS CITY REGION

- Characterisation is succinct and leads to key issues, but:
 - On what premise/evidence does the city region have the greatest potential for growth?
 - Good reference to spreading the benefits of the city region more equitably, within the city region and Region as a whole
 - Good point about all parts of the city region being “better connected – in all senses” – accessibility within those parts, however, should also be specifically mentioned
 - Reference to Economic Summit in November 2004 not clear to an ‘outsider’
- Key component “To improve the link between housing and jobs” is very welcomed – on sustainability grounds, this should be a major objective for the regional strategy as a whole not just the city region strategy, although it is correct to point this out as an acute issue for the city region, especially in those areas of significant deprivation – it would therefore be helpful to explicitly prioritise such areas
- Reference to addressing housing – market failure and high demand – fails to mention the importance of improving standards of housing (both existing and new)
- Under opportunities and priorities – **economy**, concern about reference to “promote strategic land releases, backed by infrastructure, in defined corridors with identified potential” – what corridors? Road ones? Why corridors not nodes? In what type of location? On what basis and strategy would land be released? How would it be judged for its sustainability credentials?
- Under **infrastructure**, how does “redefine transport investment priorities to recognise needs of city-region” fit with the needs of other sub areas?
 - What does “support strategically important patterns of movement” actually mean? How will such movement be made sustainable? Would such support mean reducing the need for such movement in the first place? How does it fit with the objective to link housing and jobs? (Transport is particularly important in the city region given its poor air quality levels.)
 - Promoting development in transport corridors should specify ‘public transport corridors’ – similarly, in relation to promoting a scale and distribution of new housing, should be located to reflect ‘public transport accessibility’
 - Last bullet point seems to be incomplete
- Reference to historical/cultural and landscape assets under **environment**, but no mention of flood risk which is an issue in parts of this sub area
- Under **education and skills**, “facilitating pooling of labour market” and “promote the development of a transport system without barriers to daily movements to work” has sustainability impacts – both positive (social and economic) and negative (environmental impact) – which need to be managed in the most resource-efficient manner
- Good commentaries on **social and governance** opportunities and priorities

- The **draft policy** refers to “continue restraint policies north of Leeds from Skipton through to the fringes of York” and “restrain development of York where this is necessary to conserve built heritage and historic setting” – how does this sit with proposed York sub area?
 - How will economic development in the Aire Valley – north and south east of Leeds – address the environmental constraints in the valley identified at the SA scoping stage?
 - Much is made of improving links, but is not clear as to whether these are road, public transport or other links – reference to improving links/surface access to airports should specify public transport

ECONOMY

Based on a presentation made to the Technical Advisory Group (TAG) on 28th June 2005, the following observations are made:

- Three scenarios are identified, A (trend based), B (trend based + recent high economic performance) and C (aspirational/ transformational based) – these can be easily confused with the RSS Scenarios A, B and C
- The assumptions behind the model require further assessment, but on the face of it some of the key 'major impact timeframes' have potential sustainability effects that assumptions should ideally take account of, e.g. Robin Hood Airport
- Whilst it is understood that the model is based on different growth rates for different industrial sectors across the different parts of the region, Scenario C consistently gives the highest % economic growth in all the sub areas – if this were to be applied across the whole region therefore, one wonders about the sustainability (and realism) of such aspirational growth across the board – it is not clear by what criteria the final economic growth rate, and employment land requirement implied by that, will be settled upon for each sub area and how they will relate to each other
- It is understood that policies on employment land will not specify hectares required by use class, but set guiding principles at regional, sub-regional and possibly district level upon which local policies can be developed, re-aligning such policies to sub-regional and regional needs and aspirations – this is appears a sensible approach provided that sustainability issues, particularly in respect to accessibility and connectivity, are taken full account of
- It is also noted that at this stage, the economic forecasts have not been linked to population forecasts or considered the effect of economic activity rates
- In sustainability terms, **balancing jobs/workforce with housing/ population is fundamental** – in parts of the region, economic activity rates among the working age population are woefully low, meaning that without concerted and coordinated strategies (i.e. through the RES) to address this problem, achieving aspirational economic growth will risk unsustainable patterns of development, i.e. in-commuting, or increased social inequalities and economic disparities
- In arriving at final economic growth targets and the employment land requirements thereof, policy and strategic approach should guide them rather than vice versa – in particular, sustainability principles must play a prominent role and the SA/SEA assist in assessing how well these have been applied, i.e. do the spatial strategy and sub-area approaches to employment support sustainable patterns/distribution of economic growth and activity? Do they promote balanced housing/jobs creation?
- Social inequalities, lifestyles and demographic trends are the key sustainability issues to be considered, squaring this with regional economic prosperity

- Further assessment will be required as these elements of the RSS are progressed further

HOUSING

Based on a paper presented to the Technical Advisory Group (TAG) on 28th June 2005, the following observations are made:

- This issue is inextricably linked to the Economic Approach outlined above – consultants are currently determining the effects of the economic forecasts on the overall provision and distribution of housing; as such, little can be said at this stage other than to underline the fundamental importance of balancing jobs and housing, as referred to above
- Further assessment will therefore be required as these elements of the RSS are progressed
- The paper helpfully outlines key cross-cutting issues for each policy direction
- Under affordable housing, the paper rightly identifies social inequalities, regional economic prosperity, climate change and demographic trends as the key sustainability issues – and usefully suggests how affordable housing policy can address these (the opportunity for public funds to direct reduced resource consumption in affordable housing is particularly noteworthy)
- It is important that affordable housing policy aligns with economic and housing provision overall, to ensure that its distribution is equitable
- Housing mix policy should also make explicit reference to the role of this in delivering more 'sustainable communities', addressing the 'lifecycle' needs of households and encouraging more sustainable movement patterns if allied to wider mixed use policies, i.e. local amenities and employment, and innovative approaches to housing density
- Managed release policy is especially important in addressing and carefully monitoring the success of a balanced housing/jobs distribution policy, in particular to ensure that development is successfully linking needs to opportunities rather than 'cherry picking' favourable and easy-to-develop sites first – this will mean that the policy will need to be linked to practical land assembly measures that are mutually supportive of sustainable patterns of development
- An effective regional policy for gypsies and travellers will assist in addressing social inequalities and, as such, should be framed positively as part of a holistic approach to sustainable development.

TRANSPORT

- This section puts forward all the **right sustainability messages**, e.g. reduce need to travel, promote more sustainable modes of travel. **T6** (tourism) has particularly good/elegant messages, i.e. “promote transport as being part of tourism rather than just a means of delivery”.
- It seems to be rather generic – the policies could apply to any region - and have **few clear links to sub-area strategies**, particularly to main new transport infrastructure proposed in those strategies (e.g. strengthen A64, increase capacity of the E20, Heavy Rail reopenings Doncaster- Barnsley).
- A lot of it already seems to be **covered by other policies** (both RSS and national), e.g. T1, T2
- **T2** bi (presumption against increasing highway capacity) does not seem borne out by some aspects of sub-area strategy.
- **T3** promotes the use of parking standards and refers to Table 6.3 (which isn't in the paper). Presumably the regional role is to set a consistent standard that avoids 'penalising' those areas that set rigorous standards? Is this consistent with vi) which suggests different parking charges to reflect the strength of the local economy?
- Topic paper 5a (freight) was very demand-led. The new policy **T5** seems to nicely give precedence to the more sustainable modes. Does it need to include something about minimising need to transport freight?
- **T7** suggests that 'making best use of existing transport infrastructure' for airport access should be a priority. But if the existing infrastructure is roads, then this could conflict with “achieve a target of 50% travel... by non private transport”.
- Given how unsustainable air travel is, should emphasis be on getting people onto an appropriate mode (i.e. improve rail services so that they offer a viable alternative to air travel for appropriate journeys) rather than on “achieving better access... to the full range of ... airport facility and services”?
- **T8** Include a qualifier on maximising use of ports/waterways consistent with maintenance/enhancement of water quality and biodiversity?
- **T9** (regional/local split) suggests that the RTS could include proposals that are not regionally or sub-regionally significant. Is this correct? Any major development proposed in the RTS will need to be formally appraised against the 'no development' option.
- Clarify whether the priorities in T9 are in sequence, i.e. whether strategic management measures would be prioritised over strategic east-west links. The sequence looks about right sustainability-wise.

ENVIRONMENT

- This section is not fleshed out, so many of these comments may be unnecessary once it is. But this section does not visibly reflect the quite detailed (and often very good) proposals put forward in the topic papers on water, health, minerals etc., nor consultation responses to them. If it does take account of them, should this be stated more clearly?
- This section directly supports up to 6 of the 7 key sustainability issues/problems for the region: lifestyles/global warming; biodiversity; waste and resource consumption; rural and urban landscapes; demographic trends. It would be helpful to have these problems/constraints documented more clearly in this section, perhaps taken directly from the SA/SEA scoping report.
- Lots of typos, e.g. East Cost → Coast; broad-level woodlands → broad-leaved; new to Project Arbre → next?? to ...; Aggregates Working Party appointments → apportionments
- The distinction between **climate change** and **energy generation/supply** seems unclear, especially since renewables targets are discussed under both.
- “Increasing renewable energy capacity so that 9.4% of electricity consumed in the region is from renewables” suggests that amount produced = amount consumed. Is this correct?
- Should the RSS promote biofuels more actively (seems like a possible growth sector for the more rural areas)?
- Does it need to distinguish between different types of renewables more, e.g. promote one type over another? Should it say anything about nuclear power?
- Are there any national/international implications of energy management in the Y+H region, e.g. offshore wind? This could have repercussions in terms of transboundary consultations on the SA/SEA
- Under **coastal zone management etc**, check to make sure that policies R1, N5 and S6 adequately deal with the need to prevent development in areas of environmental drought and over-abstraction; rain-water harvesting in urban areas; flood risk protection of existing urban areas etc. as listed in topic paper 8
- Given the Humber sub-area strategy's emphasis on maximising the use of the ports, does this strategy need to emphasise the need to maintain and enhance the water quality and biodiversity value of the Humber river and estuary?
- Given the ongoing decline in the quality of the region's SSSIs, is there a need to put more emphasis on identifying sites that are currently not interesting from a **biodiversity** point of view, but that could, in the future, provide useful links between biodiverse sites or wildlife corridors to help cope with climate change? Should habitat enhancement and creation be stressed more?
- Under **forestry**, it is not clear why some policies are to be deleted, particularly as they superficially seem to be quite good sustainability-wise.
- The section on **minerals** is very vague ('provide a more balanced approach'; 'move away from', 'provide a new approach') and does not seem to reflect the more specific proposals of the minerals topic paper. Difficult to appraise!
- The section on **waste** also does not seem to fully reflect the topic paper, particularly the provision of regionally important waste management facilities. Unclear why policies R10 and R11 may not be needed.

OVERALL: LINKS TO REGION-WIDE SUSTAINABILITY ISSUES

	Social inequalities	Lifestyles	Economic prosperity	Biodiversity	Waste & resource consumption	Rural and urban landscapes	Demographic trends
Spatial development principles	+	-	+	+		++	
Coast	++		+	++		++	+
Humber Estuary	++		++			+	
Vales and Tees Links	+		++			+	
Remoter Rural	+		++	+		++	
South Yorkshire			++				
Leeds City Region	+	?	++			+	
Economy	?		++?				
Housing	++	?	++		+		++
Transport	++	++	+				
Environment				++	++?	?	

- Little direct effort to tackle lifestyles, waste production, resource consumption (this could change once the environment section is fleshed out)
- Demographics – the ageing of the population – is hardly mentioned.
- South Yorkshire only directly really considers one of these 7 issues
- Consider **alternative approaches** to:
 - dealing with peripheral town, particularly on the coast
 - dealing with declining S. Yorks. villages
 - growth of Robin Hood and Humber side airports
- Much work still to be done to ensure that connectivity is dealt with a holistic and sustainable way – accessibility within areas is just as important (if not more so) than connectivity which can imply longer distance journeys, unless intrinsic to the settlement hierarchy approach to improve amenities at key hubs serving a rural or urban hinterland
- Much work still to be done in relation to the balance between housing and jobs (see separate set of thoughts).