

Appendix M. Rapid feedback on draft of draft RSS

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The logo for EDAW, consisting of the letters 'EDAW' in a white serif font on a dark blue rectangular background.

Sustainability appraisal (integrating strategic environmental assessment) of the Yorkshire and Humber draft RSS

BULLET POINT COMMENTS ON DRAFT OF DRAFT RSS

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GENERAL

Strengths

- 'Implementation' sections, which try to map out the range of co-ordinated interventions (RSS and other) needed.
- Mostly clearly written – thanks!

Weaknesses

- Much of it will only work if lots of other things outside the control of the RSS are also done. The RSS makes a good attempt to identify these and the ways other organisations can be encouraged to implement them, in the 'implementation' sections. But it has no teeth. Unless government intervenes much more vigorously, and empowers local authorities and other agencies to do so, this RSS will not do any more than slow some unsustainable trends (especially growth in greenhouse emissions, road and air travel) at the margins.
- Almost no 'outcome' measures / indicators / targets. The monitoring indicators mostly don't really measure the things that matter
- The words 'appropriate' and 'inappropriate' pop up a lot without qualification (such as 'appropriate scales of economic growth'). These can be mis-leading and vague in the context of policy.
- The word 'strategic' is overused – often just seems to be a way of claiming something is important without justifying why, and sometimes just a way to deflect questioning / analysis.

4. SPATIAL VISION

We haven't received this.

5. CORE STRATEGIC APPROACHES

- Overall fine
- Could focus more on reducing the need travel (in addition to promoting public transport)
- It might be useful to cross reference flood maps throughout – especially in sub-regional chapters.
- Yorks and Humber have done lots of good work on climate change, but this doesn't come out clearly in the draft RSS. The document might benefit from a climate change impact / response focussed review – it is not noticeably present in large parts.

6. LEEDS CITY REGION

General comments

- Overall, excellent at summarising the key issues, but falls down in places on the policy response
- Conurbations paradoxically are the most 'sustainable' locations for focusing development, but are also the most energy/resource-hungry – hence the SA/SEA takes particular interest in how this is addressed
- Excellent commentary on what is a complex array of inter-connected issues and characteristics of the LCR – direct and specific acknowledgement of the links between housing, employment and transport is highly welcomed
- However, this is not fully followed through in practical and specific policy measures *and* implementation mechanisms to address the issues
- Very poor linkages with surrounding sub areas and mutual benefits and impacts thereof of the strategy and policy framework – not clear as to relationship with York sub area in particular
- Under the policy itself:
 - still rather a number of platitudes, e.g. “support the role of Leeds as a major engine of the regional economy” can mean different things to different people
 - much mention is made to improving transport links, but it is not clear as to whether 'improving transport links' refers to rail (preferred) and/or road – it is not therefore clear as to by what mechanisms “reducing growth in congestion on the M62/M1/A1M” will be achieved, e.g. congestion charging?
 - good recognition of social inequalities/economic disparities, but no apparent reference to the importance of improving housing quality (poor housing standards identified as key sustainability issue) – very good to see direct reference to managing the release of housing land to support interventions to address low demand and affordability, but quality could also be explicitly referred to, and the point made more prominent in the overall policy
 - no mention of community safety (another sustainability issue in the LCR)
 - no mention of addressing urban air pollution under environmental quality (another key sustainability issue we identified)

- nicely specific policies on strategic patterns of development, although the concept diagram (or cross-referencing with) could be improved
- some good sustainability-compatible regionally significant investment priorities, e.g. investment in public transport, addressing low demand housing – but need to look more closely as to how they fit with the patterns of development – however, how does focusing development to south of Leeds fit with environmental constraints of the Aire Valley?
- More could be made of the landscape *value* of the area
- Under ‘World class, prosperous and sustainable economy’ box, there appears to be text relevant to the Coastal sub-area!?
- I assume reference to Urban Development Corporations means Urban Regeneration Companies?!

7. SOUTH YORKSHIRE

General:

- Robin Hood International Airport - viewed as a ‘major’ opportunity. Query wisdom of regeneration / investment opportunity / site of sub-area significance located next to Robin Hood Airport. This likely to be damaging certainly in environmental terms. Furthermore, medium-long term trends in air-travel, fuel prices, and possible future climate related legislation may make this an unsustainable option economically as well.
- Focus on extra-regional mobility is at odds with stated aims of environmental sustainability and reducing the need to travel.
- Doncaster – issues surrounding its role as a ‘logistics centre of regional and national importance’. Needs careful consideration. There is potential conflict between this emphasis on ‘logistical potential’ and other aims of sustainable settlements and sustainable transport.

The objectives:

- Urban renaissance programmes – definite thumbs up – as long as they concentrate opportunities and provide jobs, amenities suitable and accessible to local people. Sequential test will hopefully do this.
- Primary driver seems to be economic growth. Connectivity should focus on people, rather than purely economic activity – linking jobs, amenities, services – or there is danger of in fact exacerbating the exclusion / divisions apparent in the sub-area.
- The focus (first bullet of section ‘Radically Improve Connectivity’) suggest exploiting areas strong position on the motorway network, and developing road, rail and air links ‘from’ SY. Having extra-regional connection as the core focus of the sub-area connectivity approach may well undermine efforts elsewhere to localise / regenerate urban centres. An economy based on logistics and mobility is unlikely to provide significant local employment or opportunity.
- Public transport focus on access to jobs welcomed.

Opportunities and Priorities:

World class prosperous and sustainable economy:

- Need to ensure SY as centre for high-tech manufacturing and knowledge based services provides jobs appropriate to local people

- Focus on transport connectivity to improve competitiveness and unlock outlying settlements – need to ensure this is through non-car / affordable means and does not simply create dormitory commuter areas.

Policy

SY1 E: Regionally significant investment priorities:

- This just seems a little unclear – what is deemed ‘inappropriate’ in terms of development / land use? What is meant by seeking high levels of public transport accessibility ‘where appropriate’?

8. HUMBER ESTUARY

There’s really nothing to appraise here yet.

9. YORK

Spatial Strategy and Economy

- The concentration of new housing and employment development within the primary centres of York and Selby is welcomed in sustainability terms. The requirements of such development should, as far as possible, be focused toward areas where existing supporting infrastructure is already established. To a lesser extent the focus on Malton will support it as a principal service centre.
- There is no justification as to why Easingwold a Principal Service Centre should be subject to development constraint.
- The strategy should be clearer as to the balance of development between York and Selby. Clearly Selby is considered a regeneration priority area whose recent growth has been partly the result of it acting as a commuter settlement to Leeds and York. This has significant sustainability implications. Any future housing provision within Selby could encourage this commuter role. A possible solution to this is to focus new employment development in Selby over and above that to be provided for York in an attempt to address the following points
 - The need to create local employment in Selby to support regeneration priorities and reduce future commuting trends.
 - The need to create jobs which support Selby as a principle service centre role.
 - Address the constraints associated with the environmental capacity and historical character of York.
- There is no reference to rural economic policy outside of small principal service centre.
- A clearer connection between the Strategic Patterns of Development and Environment Quality should be made more specific. This may lead to the formulation of assessment criteria for development in the sub-area which the strategy currently lacks.

Housing

- The strategy successfully identifies the housing development pressures of the sub areas and in particular addresses the affordable housing needs associated with York and areas north, west and north east of York.

- The strategy emphasises demographic trends within the sub-area in particular a growing population with an above regional average of older people and a loss of younger populations particularly in smaller rural settlements.
- The strategy is less clear in terms of the implications of such trends on sub-areas needs with regard to housing type. Likewise, impacts of the above population trends in terms of the requirements on local services and facilities are not explored. The proximity to such facilities for older people is not fully addressed. Can a more sustainable approach which meets the needs of older populations with regard to housing type and design be formulated within the sub area?
- The strategy does not explore the contribution of housing design and its impact on the energy consumption and demands on natural resources. The impact of Selby's/York's development provision particularly housing development on existing and future water resources is not fully explored. Better housing design will help to maintain this resource.

Transport

- The policy promotes sustainable transport by focusing development on urban areas and improving accessibility. Combined with this is a focus on the development of a more sustainable public transport infrastructure. However the impact of the location and level of development as influencing sustainable modes of transport is not fully recognised. For example significant employment development and more restricted housing development within Selby would help to minimise current unsustainable commuter patterns.

Environment

- The Strategy identifies environmental assets and constraints within the sub-area and is specific as to what assets will be protected. However it does not explore the implications of its development strategy on environmental resources. This may be particularly important with regard to future development within Selby/York which could unduly threaten future water availability in the area. There is no indication that environmental constraints within the sub-area (other than flood risk) will restrict development growth or at the very least the nature of development growth.
- Much of the sub-area is at risk from flood. The strategy indicates that 'Minimising flood risk will be a key factor in evaluating development proposals in much of the sub area' (par. 10) however this link between flood risk and future development proposals is not reflected in policy Y1.

10. VALE AND TEES LINKS

Spatial Strategy

- The strategy successfully contextualizes the sub-area and the development pressures exerted by the proximity of Leeds/ Harrogate/ York and the Tees Valley City Region. However the threat of these city regions on the role of existing centres within the sub area is not highlighted.
- The principal and local service centres are identified; however a more accurate assessment of their role is required over and above that included - (para 3) 'These centres provide a range of services'. The sustainability implications of decline in these service centres is not stressed (e.g. impact on travel patterns, accessibility to services and facilities and future out migration of populations)
 - This links with the *Joined up Working* section which seeks to 'Develop complementary roles for the sub area's principal service centres'. This policy could be more specific as to what roles each centre could play in the future. Supporting text could put forward a sustainability rationale for developing these roles.
- The wording 'Restrain market housing development overall in the sub area' is rather weak in interpretation terms. Does this simply mean restraining it in comparison to previous levels which have been considerable?

Economy

- Within the section *Joined up Working* should the policy include supporting the renewal and regeneration of the Leeds City Region as well as the Tees Valley City Region?
- The decline of the agricultural sector is highlighted as problems in the sub-area (para. 4) however the strategy does not directly address this issues. For instance can connections be made between biomass production and the diversification of the agricultural economy in the area?

Environment

- The policy 'Investigate the scope for renewable energy generation and increasing biomass production' is weak in terms of implementation. The wording in para. 6 with regard to biomass production and how it links with transport infrastructure and power stations is unclear.
- Parts of the sub-area are at risk from flood. 'Reduce the risk of flooding in settlements adjacent to the sub area's rivers' is a fairly open ended policy. It does not preclude development within areas of flood risk and gives very little in the way of policy direction in development control terms.
- Could be clearer as to what are the environmental assets that exist in the sub-area and where they exist.

Transport

- Policy good with regard encouraging improved transport connections between the sub area's principal service centres, smaller settlements and rural areas. However no direct policy supporting more sustainable forms of transport concerning existing long distance commuting. Restricting development within the sub-area will help to curtail this trend however it does not specifically deal with the existing trend. Some reference should be made to improving existing public transport services in line with commuter trends.

11. COASTAL

General

- Last sentence paragraph 6 (Settlements and Economy) is very vague and unqualified.

Opportunities and Priorities

Physical infrastructure table:

- We would encourage the strengthening of links (east-west) to prioritise non-car means where at all possible – also see policy comment below.
- Major tourism infrastructure will have significant environmental and social impacts. This may conflict with stated environmental aims, and the protected nature of much or the sub-area.
- Relative isolation / lack of infrastructure seem likely to constrain success / viability of conference facilities and regional scale tourism.

Policy C1 – C: Transport Connections

- Focus on improving main corridors to inland conurbations may actually have adverse economic effect – sucking young, talented individuals out of the area rather than promoting growth / cohesion within it.
- May be better to build on / use peripherality as a selling point for small-scale tourism / localisation of services / business rather than seek to align with better connected, more developed inland sub-areas.
- This policy also seems to conflict with the more local / sub-area approach reflected in C1 – E: Strategic Patterns of Development.

12. REMOTER RURAL

To come

13. HOUSING

General comments

- Overall, much improved but could still do better
- The provision of housing development is addressed clearly (Policy H1), and the rationale for the distribution across local authorities helpfully set out, but the overall distribution strategy is less clear – reference is made under Implementation to “maintaining a focus on ‘transformational opportunities’ and avoids unnecessarily identifying greenfield land when it may not be required”, and policy targets previously developed land (all good stuff) – but both these criteria could be met but not be in sustainable locations even within the regional and sub-regional centres (could more explicit reference be made to focusing development at key nodes and corridors within urban areas, for example?) – cross reference back to Policy YH5?
- The issue of mix of type of housing is now very well covered with its own policy (H4) – mixed development (a term which can be misread as mixed use rather than mixed housing) – although tenure could perhaps be more explicitly referred to in reference to affordability?
- Issues relating to social inequalities nicely covered in terms of affordability, housing market renewal, and addressing the needs of different communities and lifestyles (including specific policy on gypsies and travellers) – however:
 - there does not appear to be any explicit provision for the monitoring and managing of the affordable housing targets (Policy H3) should local or sub-regional need change – better cross-referencing with regional housing strategy, which is updated more regularly, would help;
 - the needs of specific communities are only dealt with in the context of mixed development, in reference to particular areas (Policy H4);
- The strategy for housing market renewal (HMR) interventions (Policy H2) is not flexible enough to tackle affordability issues when they arise in areas of low demand whose house prices rise at above-average rates, as per recent research evidence – it could also be more explicit of how HMR plans should be incorporated within LDFs, e.g. as Area Action Plans, to give statutory weight to addressing low demand and the social inequalities that arise; it is also surprisingly slim on mix of type and tenure of housing, which is the most common causal factor of low demand housing areas (although references H4)
- The Heads of Terms Housing Paper helpfully set out cross-cutting issues, i.e. sustainability issues such as social inequalities, but these seem to have been lost in the final draft policy?
- Concern about Leeds City Region choice of proposals:
 - issue of sustainability impact of Proposal 1 (higher growth) on surrounding sub-areas, and knock-on effects on their surrounding sub-areas (e.g. super-growth of Leeds may reduce propensity of York/Selby to grow/regenerate, which in turn may accentuate the peripherality of the coastal sub-area) – is the balance right? Has this been assessed/quantified?
 - we will need to assess the background and assumptions for each proposal (as per additional papers received)
 - in this regard, the distribution of housing targets across authorities within the City Region sub-area needs to be carefully considered on

sustainability grounds, with better reference to the capacity and future investment in sustainable forms of transport and infrastructure

- In relation to sustainable use of resources, concern about low previously-developed land targets in some authority areas should be addressed through more challenging targets linked to implementation strategy to assemble sites – also concern about veiled references to demolition as being panacea to low demand, e.g. penultimate para. of H4 supporting text in reference to terraced housing – not necessarily sustainable in terms of resources and heritage
- The chapter seems weak on implementation – phasing is clearly set out, but the rationale behind it is less so, and given the emphasis placed on an uplift in development activity post 2016, a clearer strategy is needed as to how development sites will be released (quote from earlier appraisals: 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) – getting this improved should be seen as important for the sustainability of the proposals
- Could be more explicit tie-up with other policies in the text – particularly in relation to accompanying packages of transport infrastructure to handle managing growth in areas such as Leeds City Region (although understand that this is hand through regional forums/ partnerships).

14. ECONOMY

General comments

- Overall, too 'old style', i.e. employment land approach rather than a more holistic economic spatial strategy – needs significant improvements in terms of sustainability
- Much of this chapter seems little moved on from the Heads of Terms, apart from fleshing it out – in particular, the chapter is disappointingly silent on how employment land strategy can and should help address economic disparities and social inequalities, little or no cross-referencing strategies to address transport and infrastructure (and in connection with social inequalities, accessibility), and gives little strategic direction in terms of priorities
- The rationale behind key parameters of the policies is not always clear, e.g. why is 2016 the critical step change? How does this fit with the housing policies? If housing policies are to be economic growth-led, then should not the step change in economic growth and employment land needs occur earlier; if housing-led economic growth, should not the step change in housing growth be earlier? From a sustainable balance point of view, this inter-relationship is fundamental and yet there is still little or no cross-referencing to the housing strategy, despite previous appraisal comments
- Much weight is given to the local employment land reviews without little strategic advice on location and type of employment focus in different parts of the region – how is employment land portfolios going to be managed at a regional scale? (as per comment in first para. of supporting text of Policy E2: "PPS11 indicates that

RSS should set out policy for the general locations and criteria for sites, including major investment sites, so that sufficient sites are made available for business needs *whilst ensuring that unsustainable sites are not released unnecessarily as part of a process of competition between nearby authorities* (my emphasis) – it is not clear as to how this has been addressed in the chapter, (although Table E3 is a helpful starting point in terms of setting out the particular needs of each authority area)

- Good at seeing employment generating uses in a holistic fashion, considering non-B class uses as well, but need to be careful about the sustainable location/trip generating implications of major health, leisure and tourism uses (Policy E2)
- Good strong policy on town centres as focus for major trip generating uses, retail, leisure, etc., albeit poorly worded:
 - e.g. “major trip generating uses should not be located out side of these [regional, sub-regional and principal] centres *if it would undermine the delivery of these policies [sections 5-12]*” (my emphasis) seems a little weak
 - given that Policy E1 is within the economy chapter (quite rightly) it could be stronger in terms of emphasising town centres as the region’s key economic drivers and focus of communities – currently seems somewhat out of place in juxtaposition with the other policies
 - Is there a hierarchy of town centres?
- Policy E2 makes references to de-allocating employment sites where there is over-provision or obsolete sites, but it is not clear as to what sustainability checks/criteria are built in for their end use – there is an opportunity here to proactively require local authorities to de-allocate sites for employment (even any development) where, through employment land and urban capacity reviews, they are shown to be unsustainable
- Is there an error under Policy E1(second ii) – sub-regional centres will *not* be preferred location?
- Terms such as “sustainable locations” are still used without clarity as to their meaning, or cross-referencing to other policies that help define such terms
- Good point about high-density housing displacing employment to unsustainable locations – but equally more could be said about increasing employment development densities too, to accommodate both uses in ‘sustainable locations’
- Good caveats to the Clusters Policy E6, in terms of not prejudicing environmental protection provision, but could potentially be at conflict with rest of policy inasmuch that large clusters invariably require ‘fresh’ land in ‘unsustainable locations’, e.g. out-of-centre Science/Business Parks – is the policy flexible enough

15. ENVIRONMENT

Overall: does its best with limited powers. Good points:

- Serious and detailed attention to reducing greenhouse emissions (though hampered by lack of powers)
- The three environmental quality policies (Env 8 biodiversity, 9 landscape, 10 culture) are all good in not only identifying the region's designated 'family silver' but also recognising the importance of the non designated in its own right and as a buffer / setting for the designated, and calling for good management of it. But see 'gaps'

Gaps needing to be filled:

- Needs some mechanism for identifying and safeguarding environmental qualities below designated levels, to give effect to the admirable aims already mentioned. Recommend these policies call for use of QOLA – it is designed for exactly this purpose
- Healthy lifestyles and access to recreational open space – both very important – squeezed into the fringes of a policy, ENV11, which is mainly about location of sickness treatment services
- Option hierarchy for energy should be stated clearly.

Problems:

- Weak: policies with worthy intentions but huge 'where possible' loopholes
- Flooding policy (ENV1) seems broken-backed: could be paraphrased as 'we won't have development in areas of high flood risk, except where developers want it'. Are we or are we not serious?
- Developers are being asked to read lots of guidance, negotiate with lots of organisations, do things in (from their point of view) needlessly costly and elaborate ways. They won't do this without sanctions.
- On site renewables requirement is usually not a cost effective way to reduce greenhouse gases. Stupid that policy does not allow higher standards for efficiency / demand reduction
- It is interesting that renewable energy potential is tempered by need to safeguard 'character and amenity' yet transport infrastructure (for example) doesn't seem to be constrained in a similar way.

16. TRANSPORT

Overall: mostly very good. Particular strengths:

- Strong recognition of interdependence of spatial planning and transport, and consistent attempts to co-ordinate them
- Emphasis on developing in existing settlements to reduce travel and promote public transport
- Support for public transport
- Recognition of need for co-ordinated, standardised approach across region (so that eg action on parking in one town doesn't drive the shoppers down the road)
- Policies to promote use of waterways for goods transport

Some ambivalences / ambiguities that need to be resolved / clarified:

- Reducing the need to travel: the overall approach will help achieve this, and it is referred to in various places including some policies. But it is missing from the overall

objectives, and where it is mentioned it is often muddled up with promoting public transport (which is also important but different.) Recommend being much clearer and more emphatic that this is the most important overall aim

- Access: some good statements that it is access to amenities people need, not transport (especially in the rural section). But again the logic isn't followed consistently: parts of the text slip back into treating movement and mobility as ends in themselves. Recommend being more consistent about access.
- 'Making best use of existing transport networks and resources' is good if it means make more room for buses and cycles, run more trains, avoid building new roads. Bad if it means squeeze more traffic onto the roads by smarter signal phasing, navigation aids, variable charging etc
- Discussion of improving 'corridors' leaves open whether by road (bad) or rail (good)
- Some references to safety security: needs to make clear this should be by reducing threats, not by restricting non - motorised users
- Park and ride assumed to be a good thing. Needs tighter conditions about (eg) not adding to driving, supporting rather than undermining existing public transport provision.

Gaps needing to be filled:

- Should explicitly state a transport hierarchy: avoid the need for journeys first, then walking / cycling, then public transport, then making better use of existing vehicle capacity (eg car sharing) then making better use of road space, and finally increase capacity for road / air
- Health benefits of walking / cycling hardly mentioned
- No mention of need for consistent quality in all local public services to avoid people wanting to travel to distant alternatives
- Some generally welcoming noises about demand management / road charging but falling short of commitment to actually DO anything
- Local tourism / visiting not recognised / exploited as possible way to reduce travel to more distant holidays.

Problems:

- Accepts Airports White Paper, which sanctions growth in air travel which is unsustainable and irresponsible in view of latest climate science. Various misleading implications around this: eg
 - Regional airports can reduce surface travel to distant ones (only true if the regional capacity REPLACES capacity elsewhere instead of adding to it);
 - Great emphasis to more sustainable land links – but trivial compared to the flying
 - Airport developments required to undergo SA – but that doesn't alter their unsustainability
- Assumption that 'connectivity' is always good contradicts / undermines various other aims
- Discussion of options / alternatives generally restricted to other transport modes. Needs also to consider (at the top of the hierarchy) non-transport measures that can obviate transport;
- It's all palliative, trying to achieve results with only weak interventions (eg elaborate voluntarism about buses when what's needed is re-regulation, mandatory standards, popular routes franchised to cross-subsidise feeders etc.)
- It will at best slow the movement in anti-sustainable directions. Parts of it, esp air expansion, will speed up the move in the wrong direction.

CUMULATIVE IMPACTS (transport and climate change)

RSS tries to improve both.

Overall spatial strategy of trying to concentrate development in existing settlements, and where it can use and support existing amenities and public transport, will be good for reducing both greenhouse emissions and transport pressures.

RSS seeks to enable and promote public transport, cycling and walking, through both spatial and transport policies. Demand management is supported in principle. However the policy is timid and full of let-outs.

RSS also seeks to promote renewable energy and energy efficiency (though unfortunately has more powers for the former than the latter.)

However the RSS has limited powers. Success on both these depends very heavily on actions by others, especially central government. The RSS does its best to explain the other actions needed and encourage government to take or enable them. But it cannot make them happen.

Whatever the rhetoric they have been wrapped in, the last decade's national policies and decisions have allowed, and indeed facilitated, growth in both greenhouse gas emissions and the most environmentally damaging forms of travel. ('Windfalls' from the collapse of coal and manufacturing masked the underlying greenhouse gas trend for a while, but they are now over.) The underlying growth There is no current sign of a change. Indeed, recent policy decisions – to predict and provide for air travel growth, to continue large scale road building while putting implementation of road pricing off for years, to cushion energy price rises by deferring duty increases – show a government determined to maintain consumerist 'business as usual' for a few more years whatever the environmental – and eventually human - costs.

On cumulative impacts, the position is therefore simply stated:

- The draft RSS is, broadly speaking, doing what it can, within its limited powers, to move the region in a more sustainable direction over transport and climate change;
- However this is not enough to stop, let alone reverse, current unsustainable trends;
- This is because of factors outside the RSS's and indeed the region's control, notably national government energy and transport policies.

PROJECTS LISTED IN RSS AND COMPATIBILITY BETWEEN CHAPTERS

- I have had a quick review of the transport chapter against each sub-section, and not identified any conflicts. This may change when it has been possible to give them a more thorough comparison.

TRANSBOUNDARY IMPACTS (impacts beyond Y+H region)

- YH1 – F) 'create more and better jobs in the region' - potential transboundary economic impact – jobs / business flow from other regions (esp. neighbouring). Travel and environmental implications. A focus on 'quality' of growth rather than 'quantity' might ease this.
- Airport and Port development is major source of transboundary impact – particularly impact of increased volume of flights, but also impacts of increased flows of traffic (freight and passenger) to and from airports and ports.
- Humber estuary – importance as habitat of international significance (migrating birds) – this and other internationally important habitats should be viewed from an international perspective.
- Changes / development in cities near boundaries have potential transboundary impacts.
- New infrastructure development. Increased aggregate demand may not be met solely by resources within the region