

# **Strategic Environmental Assessment of the EU Structural Funds Convergence Programme for Cornwall and the Isles of Scilly, 2007-2013**

## **Draft Environmental Report for Consultation: Non-Technical Summary**

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### **Introduction**

The process of preparation of the EU Structural Funds Convergence Programme for South West England 2007-2013<sup>1</sup> is subject to a Strategic Environmental Assessment (SEA). SEA aims to ensure the Programme will deliver a high level of environmental protection and enhancement.

Central to the SEA approach is to ensure, as far as possible, that all stakeholders are able to contribute to the process. Accordingly, this non-technical summary has been produced to provide a short description of the process undertaken, the results to date, and key questions for consultation. Sections are included which cover:

1. The background to, and focus of, the Programme.
2. A description of the SEA process, and the way it has been tailored to better reflect the requirements of the Operational Programme.
3. A summary of the key environmental policy issues and environmental context in which the Operational Programme will be delivered
4. The assessment criteria which have been used to assess the range and detail of activities proposed under the Programme.
5. The conclusions from the assessment process, and possible mitigation actions.
6. The alternatives open to the Programme, in terms of possible environmental approaches, and proposals for monitoring; and

A summary of the consultation questions contained in the full draft Environmental Report is also included.

### **1. Background to, and Focus of the Programme**

European Structural Funds are used to promote regeneration and economic development in regions which are lagging in comparison to the European average. The Funds are delivered within the wider context of EU Policy, including EU policies on the environment and sustainable development.

The European Union has recently expanded to include Central and Eastern Countries, together with Malta and Cyprus. By comparison with others in Europe, these Member States are much less well developed in economic terms. Accordingly, they will receive the bulk of the available funding in the 2007-2013 period.

The South West of England will receive funding under a number of Programmes in the next round, which runs from 2007-2013, including a Convergence Programme in Cornwall and the

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<sup>1</sup> The terms Convergence Programme, Operational Programme and OP are used interchangeably in this report

Isles of Scilly. A Competitiveness and Employment Programme covers the rest of the South West. This SEA refers only to the Convergence Programme.

The of Structural Funds has historically been characterised by a high degree of partnership working and decision-making, involving, among others, the South West Regional Development Agency, the Government Office for the South West, Local Authorities, Further and Higher Education, and the Environmental Sector.

In the past, Structural Fund Programmes have helped fund a wide range of investments, covering business development, infrastructure, community economic development and training, all of which were designed to improve economic development in parts of Cornwall and the Isles of Scilly. It is now necessary to produce a new programme because there has been a great deal of development in economic policy in Cornwall and the Isles of Scilly, particularly around the preparation of the Regional Economic Strategy and the ongoing development of the Strategy & Action programme, which is more specifically focused on the sub-region. The UK Government has made clear its intention to link Structural Fund Programmes closely to Regional Economic Strategies to ensure consistency of approach.

The proposals for the Convergence Programme relate closely to the aims of the South West Regional Economic Strategy, and focus on four Priority axes, which are:

- Innovation, and Research and Development
- Competitiveness and Investment
- Learning and Skills; and
- Economic Infrastructure and Place Based Regeneration.

There is a strong commitment at strategic level to delivering activities under the above heading, in ways which minimise environmental impacts, and, in particular, move towards a position of being neutral overall in respect of emissions of greenhouse gases. This aspiration represents a considerable step forward, but one which can build on past interventions under the Objective One Programme, and which is in line with both EU and UK Sustainable Development policy, and with the wider debate on a low carbon economy.

## **2. The SEA Process**

The purpose of the SEA is to ensure the Programme will deliver a high level of environmental protection and enhancement. The SEA achieves this aim by providing a structured process through which the activities proposed under the Programme are tested against agreed environmental criteria. The SEA process involves a number of stages:

- Screening is undertaken to determine whether significant environmental effects<sup>2</sup> are likely from the implementation of the Programme.
- Environmental information is collated to provide the context for the SEA.
- A Scoping Report sets out the general approach to be taken, and is subject to consultation, to give stakeholders an opportunity to influence the process.
- A draft Environmental Report (of which this is the summary) is produced, providing comment on the draft Plan. The main element of the draft Environmental Report is the assessing the likely effects of the plan on the environment.
- Public consultation on the draft plan and Environmental Report is undertaken to gather feedback from stakeholders.
- The plan and environmental report are finalised, highlighting changes made, taking into account the views expressed during the consultation.

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<sup>2</sup> Screening is not required in this case – the European Commission has issued guidance confirming that SEA is required.

- Monitoring and review are undertaken throughout delivery of the plan to help identify adverse effects and to provide information for the next programming iteration.

In this case, the SEA process has been adapted to reflect the fact that a significant proportion of the activities which are likely to be supported by the Programme relate to business development, and not to infrastructure. Under this circumstance, it is difficult to assess the likely individual and collective impacts of projects which will be supported before they are developed.

Accordingly, the SEA process has been tailored to place more emphasis on the process through which individual projects will be developed and delivered. This focus is in line with previous evaluation work, which showed that a combination of administrative aspects (questions in application forms) and management aspects (involvement of environmental expertise in all decision-making process) produced the best results in terms of environmental performance.

The table below shows how the SEA and Programme Development processes have proceeded.

<b>Steps in Programme Development</b>	<b>Steps in SEA Process</b>
EC documents and the (then draft) NSRF set out the broad areas which can be covered by the OP, and also emphasise the need for connection to regional priorities as set out in the RES.	These documents provided context for the SEA Scoping Report.
The RDA and GOSW with CCC and regional partners co-ordinated the production of detailed socio-economic material, with support from Ekos Consultants. A number of Task and Finish Groups were set up and provided input into the draft Programme; a large scale consultation event was held in Newquay at the start of October which also helped develop the approach.	A Steering Group was been set up to contribute to the environmental aspects of the Convergence Programme, and also to oversee the SEA process. Representatives from GOSW, South West RDA, Environment Agency, English Heritage, Natural England, and the Objective One Partnership are all involved. In addition, wider consultation on the Scoping Report was undertaken with Environment Kernow.
The draft Operational Programme was developed, taking into account summary findings from the SEA process and the finalised NSRF.	This draft Environmental Report was produced, based on the actions set out in the draft OP, and taking into account responses on the Scoping Report.
Consultation on both the draft Programme and Environmental Report runs until February 16 <sup>th</sup> 2007	
A revised OP, taking into account consultation responses, will be submitted to the European Commission.	The Environmental Report will be finalised, including an additional section on the feedback received from consultation and comments on that feedback from the responsible authorities.

### **3. Environmental Context**

A great deal of policy material and environmental data was reviewed to provide the environmental context for the SEA. The table below highlights the most important issues and trends – issues around energy and climate change are of critical importance to the Programme.

**SEA Topics, Data Coverage, and Key Points from Initial Analysis**

<b>SEA Topic</b>	<b>Data</b>	<b>Trends and Key Points</b>
Population	Population estimates and trends will be included in socio-economic data, as will data on demographic structures and trends.	The population of the SW has been rising at the fastest rate of all English regions. This trend is also evident in Cornwall and the Isles of Scilly, and is expected to continue, driven in part by the high quality of life in the region. There is increasing demand for housing, for the use of transport infrastructure, and on environmental resources. Existing policy, as set out in the RSS, is to accommodate that growth in ways which minimise negative environmental impacts.
Human health	Data on life expectancy is included in the socio-economic profile, along with wider information where related to the aims of the OP. Some information on health and environmental quality is also included.	Life expectancy in the SW is among the highest in England. Studies generally show a positive relationship between employment (and voluntary work) and health. Local environmental improvements can also be linked to health improvements, and to a number of key health aims, especially around promotion of active lifestyles.
Biodiversity, Flora and Fauna	Data on designated areas are included, together with assessment data on their condition. Trend data on bird species, including farmland birds, is one of the government's headline indicators of sustainable development.	The proportion of SSSI's in target condition is continuing to increase, but a significant minority remain in poor condition. One of Defra's PSA targets is to have all SSSI's in favourable condition by 2010. The majority of current pressures on biodiversity (and on countryside landscape and water quality) are most directly associated with agricultural practices, and with demand for products from the food and drink sector. There has been a long-term decline in farmland bird numbers, although there is some evidence of populations stabilising more recently. Agri-environment schemes which have nature conservation (and landscape quality) central aims have been introduced and expanded in recent years.
Landscape & cultural heritage	Data on landscape designations such as National Parks and Areas of Outstanding Natural Beauty are available, as are data on the occurrence of historic and distinctive landscape features, and on landscape change. It is important to note that the built landscape, in terms of the use of local materials, building design and the layout of towns and villages, is also very distinctive in the county. Data are also available on the extent to which landscape, countryside and coast represent attractions for tourists.	In common with other parts of England, there has been a long term decline in a number of distinctive landscape features over the long term, largely associated with agricultural practice. The natural and historic landscapes of the SW are widely recognised as forming the primary attraction for tourists and are also a central aspect of quality of life in Cornwall and the Isles of Scilly. There is some evidence of landscape change which is out of character with existing features.
Soil / Change of land use	Soil condition in the Programme area is closely associated with agriculture, and direct effects from the Programme are therefore unlikely. However, increasing development and expansion of urban areas implies a wider change in land use. Data on the re-use of previously developed land is included.	The re-use of brownfield land for housing within the SW is at lower levels than in England as a whole. However, RSS acknowledges that, although the SW has large areas of brownfield land, much of it is located in areas where its re-use would worsen other environmental trends, particularly in terms of transport and climate change emissions. Existing policy, endorsed by the SSA / SEA of the RSS is to concentrate development in existing towns and cities, re-using land where possible in that context.
Water	Data are available on water quality, availability, and cost	Water quality has been improving, but there remain some poorer areas in terms of biological quality in particular. There is also increasing pressure on water use, and water availability may be a constraint on development in some areas in future. Water costs per unit have been rising in recent years, although standing charges have fallen.

Air quality	Local air quality data are limited; where problems exist, they are concentrated in urban centres, and are most closely associated with emissions from transport.	Local air quality has improved in recent years in line with technological advances in road transport engines and emissions. However, rising volumes of road transport and congestion mean that isolated issues remain, concentrated in urban centres.
Climatic Factors	Climate change emission data by source are available. Trend data on transport use, the fastest growing source of emissions, is available. Limited data exist on the generation of renewable energy in the region. Data are also available on the benefits from existing energy efficiency work, at both project and programme level, and on energy costs.	The twin issues of reducing climate change emissions and adapting to unavoidable effects of climate change are highlighted across all policies, from EC to regional level. The issues are also recognised in the RES. Existing trends at UK level show a slight fall in emissions from industry, but a consistent rise in emissions from transport, and these trends are thought similar in the SW. More detailed analysis was undertaken in support of the SSA for the RSS, which highlights the scale of change of approach that would be necessary to reduce emissions, especially in relation to transport (including air travel, where emissions are increasing rapidly). Experience elsewhere suggests that significant savings from more efficient use of energy are possible within business, more so in the context of rising energy prices. Discussion on the most effective ways to address climate change emissions in the context of the Programme is a major focus for the SEA, particularly in the context of the strengthened focus in the finalised NSRF and considering wider developments including changing political emphasis and the publication of the Stern Report.
Material assets	Data on waste arisings by source (domestic, industrial, commercial) are available, as are data on recycling. It is also hoped that data on the costs of waste disposal will be available. Data on the benefits from waste minimisation projects are also being sought.	Volumes of waste generated in the region are of comparable levels to those elsewhere in England. Construction waste forms the largest single component of all waste, and volumes are rising. Volumes of industrial waste are falling slowly. Landfill and recycling are the main method of disposal, and there is increasing pressure on landfill availability. Volumes recycled are rising. Costs of waste disposal are also rising, driven jointly by the need to meet higher standards and increases in landfill tax.
<b><i>The topics below are not included in SEA guidance, but have been added with the agreement of the steering group as being relevant to the aims and activities of the Programme</i></b>		
Environmental performance of business	Data are available on ISO14001 registrations, but may not be complete. Other data, for example, on registrations of BS8555 (environmental standard for SMEs) are being investigated.	No trends are available; there is a greater concentration of ISO 14001 registrations in areas with large manufacturing industry bases such as the Midlands, than in the SW. Registrations overall represent a very low proportion of the business base.
Local environmental quality	Information on the role of the environment as a component in local regeneration is being sought.	Case studies illustrate the contribution that environmental actions, for example focused on recycling or physical improvements, can make to local regeneration. Such projects are frequently undertaken as a focus for volunteering, training and work experience, and have can particular benefits in engaging those furthest from the labour market,
Skills, training & awareness		In the longer term, higher levels of understanding of environmental issues and solutions will be critical to delivery of a more sustainable economy.
Evaluations from past EU Programmes	Evaluations of past work on environmental integration are available for both Cornwall and the Isles of Scilly, and for other English regions.	Evaluations highlight the importance of management and administrative actions in ensuring high level aims are translated to delivery at project level.

#### **4. Development of Assessment Criteria**

In addition to providing background information for the SEA process, the development of context information helps clarify the most important issues to be addressed in the assessment process. The headline questions are in the table below:

<b>To what extent will the activities proposed under the programme...</b>
...seek to reduce climate change emissions?
...include actions to mitigate the existing and predicted effects of climate change?
...encourage greater efficiency in the use of materials, including re-use of waste?
...contribute towards improvements in water quality and management?
...reduce emissions associated with transport?
...ensure developments enhance and fit within both natural and built landscapes, including historic townscapes?
...contribute towards improvements in biodiversity?
...seek to develop sustainable technologies, both as a sector in their own right, and as a tool for improving the wider environmental performance of the programme area?
...improve understanding of environmental issues and solutions among, and appropriate to, all organisations receiving support through the Programmes?

These criteria were then used to assess the detail of proposed activities set out in the Programme.

#### **5. Results of the Assessment Process**

Assessments were made at strategic level, against the detail of the Programme, and then of the consistency of approach between the two.

##### ***High Level Assessment***

The assessment at strategic level found that the approach described towards environmental integration is strongly positive. There is clear reference to past work and evaluations of its success, but at the same time recognition that the debate surrounding environmental issues has moved on considerably, and that a significantly stronger approach is now required, particularly in relation to emissions of greenhouse gases. There is a high degree of consistency between the aims of this SEA, and the types of activity highlighted against each Priority Axis.

##### ***Innovation and Research & Development***

The focus on the development and commercialisation of new technologies clearly recognises the opportunities associated with environmental change. However, there is at present less explicit recognition of the need to ensure that new products and services which are supported assess, and if necessary are assisted to improve, their environmental impacts. This will be particularly important in relation to energy use, in the context of the likely focus on reduction of carbon emissions. There are likely to be only quite limited, secondary opportunities to enhance the natural environment under this heading.

The assessments clearly show that impacts including mitigation will be strongly positive, but also that the achievement of those impacts will depend upon the extent to which the structures employed embrace environmental issues and provide appropriate support for the businesses and academic institutions concerned.

## **Competitiveness and Investment**

Similarly, there is already a strong focus on the development of the environmental sector under this heading, but much less substantive mention of resource use and energy efficiency as issues for all mainstream businesses in the detailed texts. The key point here – as acknowledged in the strategic material - is to ensure that a strong emphasis is placed on business efficiency services which are:

- Targeted at those sectors which will benefit to the greatest extent, such as those with higher energy requirements, or which depend on large volumes of water, for example those in the food and drink sector; and, in a related point,
- Integrated within mainstream services, so that all business advisors are aware of both issues and solutions, and, in line with the above, able to recommend their use as appropriate.

The outcomes of these actions will include both more efficient mainstream business, but also an expanding market for the environmental technology sector. There may also be possibilities of supporting green procurement activities more widely, to further develop the market.

Some elements of this Priority also provide seek to encourage the development of new businesses, or to promote faster growth among those with the potential for rapid expansion. Advice on environmental impacts is often most effective at these stage; it is generally easier to incorporate recommendations while other changes are happening in any case, than to seek to address issues once they are embedded.

## **Learning & Skills**

The emerging aim from the assessment here are:

- To ensure that environment (and wider sustainable development) issues are incorporated into all mainstream training, as appropriate;
- To seek to make available support for organisations which deliver social and economic benefits through environmental activities, accepting that this wider focus may incur additional costs as well as benefits; and
- To ensure that good practice in terms of environmental management is mainstreamed across all organisations, and that the environmental quality of training facilities complements the content of learning.

Again, these aims are reflected in the detailed environmental material, but are not well integrated into detailed text. Two key gaps are evident.

Firstly, there is only very limited recognition of the potential and actual role of the voluntary sector, including the environmental voluntary sector, in providing opportunities for volunteering, training and work experience, particularly for target groups who require intermediate activity before re-entering the labour market. There are numerous successful examples of such projects, supported by Structural Funds, in other UK regions.

Secondly, there is no commitment to the use of BREEAM – evident across other Priority Axes – in the development or refurbishment of training facilities. This is critical to avoid the possibility of incoherence between the content of training and the site within which it is delivered.

### **Place Based Regeneration**

The majority of actions proposed under this heading relate to transport infrastructure, in particular to road and air infrastructure, and this is by far the largest ERDF Priority in financial terms, accounting for 40% of the total Programme. There are likely to be significant, negative impacts on climate change emissions as a result. Local landscape and biodiversity impacts will depend on the quality of design of specific projects.

Within the discussion at the start of this Priority Axis, there is a commitment to developing all transport infrastructure within a sustainable context. If this is to be delivered in practice, it will be necessary, particularly considering the scale of these activities, to present more clearly the implications in terms of the associated generation of carbon dioxide, and to link these activities to the approaches to carbon neutral discussed elsewhere in the Programme.

### **Overall Programme Assessment**

The exercise of mapping SEA questions against the aims of the Programme suggests that the key strategic issues are:

- Encouraging and supporting energy and resource efficiency in business development;
- Ensuring that new products and services are better, in environmental terms, than those they replace;
- Promoting awareness of environmental issues and solutions in training and skills, particularly in sectors with a close relationship to the environment;
- Ensuring take-up of environmental good practice in all aspects of construction, from site selection to building quality and soft landscaping; and,
- Exploiting environmental opportunities to deliver social and economic gains, including those in the social economy as well as in mainstream business and technology; and, in the context of all of these
- Seeking to make a significant contribution towards the aim of reducing greenhouse gas emissions, in line with moves towards a low carbon economy.

The strategic approach to the environment within the Programme is strongly positive. However, the integration of the detailed environmental aims within the Priority Axes is less consistent. In general, the Programme recognises opportunities much more clearly than it describes the need for, and long term benefits of, mainstream economic development moving to a more environmentally aware approach. The aspiration to discuss making the Programme Carbon Neutral is very strongly positive, particularly in the context of including activities under Priority Axis, which are likely to increase CO<sub>2</sub> emissions.

However:

More attention could be paid to opportunities around the development of social enterprises, including those with an environmental theme, in the context of addressing the needs of those furthest from the labour market.

Little attention is paid to the past and possible future contribution of the environment / heritage tourism sector.



Finally, the assessment process highlighted the extent to which impacts could be made positive where mitigation actions were included. At the same time, it emphasises that mitigation requires, in most cases, the involvement of environmental advice and expertise. This is in line with past evaluation findings, and highlights the need for the SEA to consider these issues as proposals for Programme delivery develop in the future.

## **6. Issues Around the Implementation of the SEA**

The summary assessments above are generally positive. However, it should be noted that the Programme does not, at this stage, discuss the detail of implementation arrangements. Such arrangements have been recognised in evaluations as being critical in the delivery of environmental integration, and the existing Programmes in the South West have a strong track record on which to build in this respect.

Consideration of Alternatives is a central element of the SEA process. Following discussion, the SEA Steering Group agreed that the most meaningful approach to this issue was to examine alternatives in the context of the depth of environmental integration to be employed within the new Programme. The table overleaf sets out three indicative options which are presented – it would, of course, be possible to combine elements of these.

This approach combines the consideration of alternatives with that taken to mitigation, in that the second and third options seek more explicitly to understand and reduce the environmental impacts of the Programme in line with the assessment findings. The second option represents, to a large extent, the current position. The third option is constructed around moving the Programme towards a more Carbon Neutral position across all its activities. This is in recognition of the importance of the issue of climate change, which emerges clearly from both the environmental context and policy material.

There is not yet clear understanding about what a commitment to carbon neutrality might mean in practice. However, it is important to recognise that a greater focus on carbon is in line with many of the aims of the current European Programmes and RES, including, for example:

- Business efficiency work and the development of renewable energy technologies both address carbon emissions.
- Waste minimisation and the re-use of waste reduce emissions.
- The use of BREEAM standards reduces emissions during the life of buildings.
- The re-use of historic buildings has benefits in terms of embodied carbon.
- The use of local materials reduces emissions from transport, as well as maintaining distinctive built landscapes.

Moves towards Carbon Neutral should therefore be seen as a significant step forward, rather than a complete change of direction, but would still imply a much greater focus on the use of energy in projects than is the case at present.

**Table 6.1: Alternative Approaches to Environmental Integration**

Outline of Approach	Delivery implications	Comment
<p>1. Environmental activity is limited to:</p> <ul style="list-style-type: none"> <li>• that required by prevailing legal standards, i.e. planning permission, emissions control...</li> <li>• Except where the market demands otherwise (e.g. energy saving services)</li> </ul>	<p>No staff resource or additional administration required. Application questions would seek only confirmation of legal compliance.</p>	<p>Although possible in theory, this option would be out of step with Commission and UK Government guidance, as well as the stated aims of the SW RES. This is effectively the position which existed in EU Programmes in 1994-99 and earlier.</p>
<p>2. Higher levels of environmental added value are sought on a project by project basis, where these represent the mainstreaming of existing good practice, such as:</p> <ul style="list-style-type: none"> <li>• BREEAM standards in building projects;</li> <li>• Integration of environmental advice into business development projects, where possible</li> <li>• Projects with a strong environmental theme are supported only where they, individually, generate social and economic outcomes.</li> </ul>	<p>A similar staff resource would be required to that under the current Objective 1 and 2 Programmes<sup>3</sup>.</p> <p>As now, application processes would include consideration of environmental issues as part of the decision-making process, and environmental expertise would be integrated into (and developed within) those processes.</p>	<p>This is essentially the current model. Evaluations<sup>4</sup> show that it has been extremely effective in the SW and in other GB regions and nations, and that the staff resource is critical to delivery; programmes which relied only on administrative mechanisms were much less successful in embedding environmental sustainability in projects.</p> <p>The continuation of this approach in the new Programmes would represent consolidation, and possibly a limited progression compared to existing practice, especially if best practice lessons from elsewhere in the UK are replicated in the SW.</p> <p>It is worth noting that current Programmes which relied only on administrative mechanisms and which did not employ staff to work with partners, were considerably less successful in delivering environmental additionality.</p>
<p>3. The environmental impacts of the Programme as a whole are assessed and addressed; the most appropriate way to do this, given the focus of the proposed activities, would be to adopt the aim, if possible, of making the Programmes carbon neutral. In addition to the above activities, this would imply support for projects which explicitly deliver carbon positive activities.</p>	<p>In addition to the above, it is likely that some form of mechanism would have to be created to oversee projects which compensate for the carbon emissions of mainstream activity. More detail on what this might mean is provided below.</p>	<p>This approach would represent a considerable step forward for the Programme, and would be in line with the aspirations of the RES to develop economically within environmental limits. It is clear that emissions of CO<sub>2</sub> are already higher than is sustainable; the opportunity exists to seek to develop the Programmes in ways which meet the UK Government's aim of decoupling economic growth from environmental impact.</p>

<sup>3</sup> As a rough guide, the staff resource at present equates to 1 Full Time Equivalent per £100m funding available.

<sup>4</sup> The Effectiveness of EU Structural Funds in Delivering UK Government Environmental Aims, Fraser Associates & the Rural Development Company for Defra; executive summary at [http://www.objectiveone.com/O1htm/01-cross-cutting/ES\\_intro.htm](http://www.objectiveone.com/O1htm/01-cross-cutting/ES_intro.htm)

## **Monitoring**

Evaluation experience shows that it is often difficult to relate the environmental impact of economic development programmes to the activities supported. Accordingly, a range of indicators is suggested which would help monitor the environmental impacts of the Programme. All have been used successfully in EU programmes in the past, and some are currently proposed for use in all new Programmes at UK level.

- Number of new products and services in the environmental sector
- Number of new businesses / products integrating environmental management activities
- Area of brownfield land developed, and its proportion of the total
- Area of buildings constructed or refurbished to BREEAM standards
- Number of Businesses in the environmental sector supported.
- Number of (mainstream) Businesses undertaking environmental management, and results in both environmental and economic terms.
- Number of businesses achieving recognised environmental standards.
- Number of environmental social economy businesses assisted
- Training & volunteering placements created with an environmental theme

It is important to note that these indicators do not capture all aspects of environmental integration. For example, the wider aim under the Innovation & Knowledge Priority is to ensure that all new products and services incorporate appropriate environmental advice; this may not easily lend itself to quantification, and so qualitative evaluation may be needed in addition to the above.

### **Consultation Questions**

Comments are welcome on all aspects of the draft Environmental Report and on the Competitiveness Programme to which it refers. However, a number of particular questions are raised throughout the draft Environmental Report, and those which relate most closely to this summary are reproduced below:

- Do you have any comment on the approach proposed to undertaking the SEA, in the context of the Competitiveness and Employment Programme?
- Do you have any comments on the range of environmental policies and data which have been used to focus the assessment questions, or on the assessment questions themselves?
- Do you have any comments on the summary findings from the assessment process?
- Do you have any comments on the approach taken to consideration of alternatives and to mitigation?
- Do you have any views on which of the alternatives should be adopted, or on the detail of the discussion around carbon neutrality?
- Do you have any comments on the proposed monitoring framework?

Responses should be emailed to: [Convergence@southwestrda.org.uk](mailto:Convergence@southwestrda.org.uk) or posted to: Phil McVey, South West Regional Development Agency, Castle House, Pydar Street, Truro, Cornwall, TR1 2UJ.